



Asset, property and facilities managers are all likely to be required to produce and publish an annual statement of their own to be fully compliant in meeting the requirements set out in the Modern Slavery Act (2015) (MSA).

As asset, property and facilities managers all have a formal responsibility for managing their direct procurement processes and the procurement processes within their supply chains, it is important that each party has a clear understanding of its modern slavery obligations, and how to meet them.

Property managers also have an additional role in ensuring the effective management of the procurement and supply chain that they undertake on behalf of asset managers.

Complying with modern slavery obligations should involve the following considering the following steps:



STEP 1: UNDERSTAND RESPONSIBILITIES

Supply chain definition

'Supply chain' can be defined as: "a system of organisations, people, activities, information, and resources involved in supplying a product or service to a consumer".

MSA responsibilities extend beyond any suppliers and contractors directly procured by a property manager, to suppliers and contractors procured by those organisations in turn, extending in a chain from the original state of a good or service to the end buyer.

Asset managers

An asset manager has an overarching responsibility to ensure that there is no breach of human rights associated with their properties, including those relating to Modern Slavery and human trafficking.

Compliance with the MSA should be managed through a strategy and policies for addressing human rights at the business level. This should be assigned to the CEO and a board-level director responsible for supply chain. Functional responsibility should be allocated to appropriate senior leaders to ensure effective oversight and monitoring, and to ensure clarity across a business.

Part of this strategy should include the identification of the products and services within a property portfolio that will be delegates to a property manager.

Property managers

Through Property Management Agreements, procurement procedures and contracts, responsibility for the day-to-day management of MSA compliance associated with a property generally falls to the property manager.

A property manager has responsibility for scrutinising the procedures that suppliers and contractors have in place to minimise risk. Property managers should have sufficient knowledge and understanding of the underlying risks and issues associated with modern slavery, so that they are able to pick up on potential significant issues.

Facilities manager

Similar to a property manager, a facilities manager has responsibility for scrutinising the procedures that suppliers and contractors have in place to control modern slavery risk in relation to facilities management services contracted to them for a property.

Suppliers

A supplier is responsible for ensuring modern slavery risk is managed for activities falling within their scope of works, in accordance with their contracts and terms and conditions.

STEP 2: ESTABLISH A POLICY FRAMEWORK

A range of policies can provide a framework to govern modern slavery and associated issues. There should be clear ownership and responsibility for these policies, and all employees and sub-contractors should have knowledge of them and access to them.

Where possible, these policies should be available in the range of languages used at a property, as well as relating to the organisation within its supply chain. This can help to achieve clarity, so that all parties are aware of their roles and rights.

A Modern Slavery Statement can help to create transparency and reduce risk throughout the supply chain.

A Procurement Code of Conduct should ensure that suppliers' practices and controls are aligned to an asset manager's ethics and human rights expectations for a property. These may be set out directly by an asset manager for a portfolio, or collated and designed for a specific property and set out by a property manager.

Other relevant policies that may shape a modern slavery and human rights policy framework include, for example:

- Equal Opportunities.
- Harassment and Bullying.
- Ethics Policy.
- Whistle Blowing Policy.



STEP 3: CHECK DOCUMENTATION AND SCREENING

Property managers should develop formal procedures to check the credentials of suppliers and contractors, including sub-contractors. This will include, but is not limited to:

- Requests for documentation on placing or renewing contracts.
- Use of a vetting scheme such as SafeContractor.

During the early stages of contractor selection, property managers should undertake a risk assessment to identify activities and supply chains where modern slavery risks could be anticipated.

Using a risk-based approach, a property manager can evaluate contextual risk factors. This can help to map the activities in relevant sectors or geographies that may benefit from further assessment.

[The International Finance Corporation’s “Managing Risks Associated with Modern Slavery” Good Practice Note](#) sets out the following contextual questions that should be considered when prioritising elements of the supply chain where modern slavery risk should be prioritised:

Is there a high risk of modern slavery in the sector?

- Sector has high modern slavery risk.
- Specific groups that may lack basic protection under law and that face discrimination and persecution.

What type of workers are likely to be present in the contract - will the following groups be present, especially in large numbers?

- Females.
- Internal/foreign migrant workers.
- Refugees.
- Low skilled workers.
- Informal workers.
- Temporary/agency/contract/seasonal workers.

Are there characteristics of a sector or individual supplier’s management systems or sites that may lead to risks?

- Allegations of poor practices against a business partner.
- Early stages of work on a site, or of production in a supply chain, where there is less oversight of workplace practices.
- Inadequate or poor management systems.
- Lack of transparency.
- Complex subcontracting and supply chains.
- Abnormally low tender or contract cost with third party.

PM

STEP 4: UNDERSTAND THE SUPPLY CHAIN

It is likely that many organisations will already have a robust understanding of their first-tier suppliers and contractors, i.e., those that are directly instructed.

As modern slavery risk often lies at lower levels within the chain, property managers should map each area of a property’s supply chain that has been assessed as a priority. Due to the complexity of some supply chains, engagement with first tier suppliers to cascade information requests will be necessary to enable full disclosure throughout the lower tiers.

PM

STEP 5: UNDERTAKE WORKPLACE ASSESSMENTS

Workplace assessments can supplement auditing documentation and policies where a higher risk of modern slavery has been identified.

Property and facilities management teams should undertake routine monitoring of contractors. However, allegations and reports of modern slavery which have been identified through pre-screening or other mechanisms should trigger a more focused assessment, usually to be carried out by expert assessors.

Industry groups such as the [Responsible Business Alliance](#) (formerly the Electronic Industry Citizenship Coalition) or the implementation of the [Supplemental Validated Audit Process](#) – a specialised programme aiming to identify forced labour risks - can ensure that such assessments are carried out by specialist auditors.

STEP 6: RECORD EVIDENCE

Records of modern slavery information enables the ongoing analysis of contractors and suppliers in order to inform decisions on procurement on a rolling basis.

Detailed documentation, questionnaires, notes from site visits and correspondence should be retained in a central platform as part of a detailed modern slavery audit trail.

All new supplier information, for example, checklists, questions responses, policies and procedures should be stored and retained for future reference as a robust evidence base.

It is important that all information, in whatever form, is recorded and stored in accordance with data protection regulations.

STEP 7: TRAINING

Training of key personnel at every level within property management organisations is necessary to ensure that modern slavery risk is managed and mitigated.

It is also important to be confident in the training processes adopted by tier one contractors and suppliers, including the collation of evidenced of training being cascaded through the supply chain tiers.

For higher risk suppliers, including suppliers in higher risk sectors, asset managers may consider delivering training directly.

Training will differ for different roles, but should be specific to the function being undertaken. The primary focus areas for training should include:

- Procurement. The ability to ensure detailed assessments are undertaken and recorded in contract selection and management.
- Operations: An understanding of risk indicators in the workplace.
- Auditing: An understanding of the tools and on-going monitoring required to mitigate risk.

STEP 8: ONGOING MONITORING

Asset, property and facilities managers should consider establishing cross-functional working groups to focus on, and continuously monitor, human rights risks, including modern slavery, in both direct operations and supply chains.

Key Performance Indicators (KPIs) can be adopted to monitor ongoing performance and the effectiveness of mitigation measures. KPIs could include:

- Number of employees with awareness training in modern slavery.
- Evidence of risk assessments.
- Supply chain verification checks.
- Property managers are encouraged to explore and set relevant KPI targets to monitor their own and supplier progress.
- Evidence of effective communication processes for on-site labour.
- Evidence of Staff surveys.