SUPPLY COMPLY

The 52 questions

How to monitor and measure modern slavery risk across your supply chain.

ebida · Supplier Development Programme · Modern Slavery Compliance webinar

How do you monitor your supply chain, and how is that reflected in your Modern Slavery Statement?

These are the questions Supply Comply asks: 52 of them, across the seven areas public sector buyers weigh. They are the same whether you are answering for your own organisation or sending them to a supplier.

How to use this list

1. Go through it for your own business first. Wherever you cannot answer, or the answer is "we don't", that is a gap in your Modern Slavery Statement.
2. Pick your three highest-risk suppliers. Could you answer it for them?
3. In Supply Comply each question is scored on four levels (Bronze, Silver, Gold and Platinum), which gives a risk rating, a score for every area and an improvement plan. Nobody expects Platinum. Buyers want to see that you know where you sit and have a plan to move up.

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AREA 1 OF 7

Governance & Accountability

Named accountability, board oversight, documented responsibilities

1.1	Has a senior leader been formally appointed with accountability for the organisation's response to modern slavery risks?
1.2	Are there clear lines of accountability for decision-making, escalation and ownership of modern slavery risks?
1.3	Does the board or executive team receive regular reports on modern slavery risks, actions and performance?
1.4	Is modern slavery included within the corporate risk management framework or risk register?
1.5	Are actions and remediation plans reviewed by leadership?
1.6	Is governance for modern slavery formally documented?
1.7	Are incidents escalated using a defined approval route?
1.8	Is there an annual strategic review of the organisation's approach to modern slavery risk?

AREA 2 OF 7

Policies & Procedures

Modern slavery policy, supplier code of conduct, document control

2.1	Is there an approved modern slavery policy covering internal operations and supply chain expectations?
2.2	Is the policy formally approved by senior leadership and reviewed at least annually?
2.3	Is the modern slavery statement publicly available and easy to access?
2.4	Does policy explicitly prohibit recruitment fees, bonded labour, child labour and passport retention?
2.5	Is the policy communicated internally to employees and externally to suppliers?
2.6	Are supplier standards documented in a Supplier Code of Conduct?
2.7	Are procedures in place for document control and version management?
2.8	Are related procedures aligned across HR, procurement and compliance teams?

AREA 3 OF 7

Risk Assessment & Supply Chain Mapping

Supply chain mapping, geography risk, category risk

3.1	Has the organisation mapped its Tier 1 supplier base?
3.2	Have higher-risk geographies within operations or supply chain been identified using evidence?
3.3	Have higher-risk sectors or labour-intensive categories been identified?
3.4	Is there a documented supplier risk scoring methodology?
3.5	Are new suppliers screened for modern slavery risk before onboarding?
3.6	Are existing suppliers periodically re-assessed based on risk level?
3.7	Are purchasing practices assessed to ensure pricing or lead times do not create exploitation risk?
3.8	Can product or source-country data be identified for relevant goods?

AREA 4 OF 7

Due Diligence & Controls

Supplier screening, audit process, corrective action

4.1	Is there a formal supplier due diligence questionnaire covering labour standards and controls?
4.2	Do supplier contracts include modern slavery and ethical labour clauses?
4.3	Are suppliers required to cascade standards to their own subcontractors and suppliers?
4.4	Is evidence requested from suppliers to support compliance claims?
4.5	Are higher-risk suppliers subject to audits or site visits?
4.6	Is there a corrective action process when supplier issues are identified?
4.7	Can the organisation provide requested compliance evidence quickly to customers or buyers?
4.8	Are sanctions, adverse media or enforcement checks undertaken on suppliers where relevant?

AREA 5 OF 7

Worker Protection & Reporting

Grievance channels, worker rights, contracts

5.1	Is there a confidential grievance or whistleblowing channel for employees?
5.2	Is the grievance mechanism available to agency workers and supply chain workers?
5.3	Are reports investigated using a documented process?
5.4	Does leadership review whistleblowing trends and lessons learned?
5.5	Are workers provided with written contracts in a language they understand?
5.6	Are workers free to leave employment and accommodation without coercion?

AREA 6 OF 7

Training & Capability

Staff awareness, procurement training, supplier guidance

6.1	Is modern slavery awareness training provided to employees?
6.2	Are procurement and commercial staff specifically trained on identifying and managing supply chain risk?
6.3	Are suppliers given guidance or training on expectations?
6.4	Is training completion measured and monitored?
6.5	Are new starters trained during onboarding?
6.6	Are senior leaders trained on governance responsibilities?

AREA 7 OF 7

KPIs & Continuous Improvement

Measurable targets, year-on-year improvement, public reporting

7.1	Are KPIs in place to measure effectiveness of the modern slavery programme?
7.2	Is the percentage of suppliers risk assessed measured?
7.3	Is the percentage of high-risk suppliers reviewed or audited measured?
7.4	Are incidents, concerns or allegations logged and trended?
7.5	Has any incident in the last 12 months been remediated with evidence?
7.6	Is there an annual improvement plan for responsible procurement / modern slavery controls?
7.7	Does the organisation collaborate with peers, NGOs or industry groups to reduce risk?
7.8	Can the organisation demonstrate continuous year-on-year improvement publicly?

Want it scored, tracked and turned into a statement?

Supply Comply scores each answer, rates the risk across your whole supply base, turns the gaps into an improvement plan and builds your Modern Slavery Statement from the evidence you hold.

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