

WHO MADE OUR UNIFORMS?

U.K. Public Sector Apparel Procurement:
Ensuring Transparency and Respect for Human Rights



ABOUT THE AUTHORS



CORE Coalition

CORE is the U.K. civil society coalition on corporate accountability. We aim to advance the protection of human rights with regards to U.K. companies' global operations, by promoting a stronger regulatory framework, higher standards of conduct, compliance with the law and improved access to remedy for people harmed by U.K.-linked business activities.



ICAR

The International Corporate Accountability Roundtable (ICAR) harnesses the collective power of progressive organizations to push governments to create and enforce rules over corporations that promote human rights and reduce inequality.

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GLOSSARY

AQAP 2110 – NATO Quality Assurance

BitC – Business in the Community

BSCI – Business Social Compliance Initiative, a leading supply chain management system

CCS – Crown Commercial Services

ETI – Ethical Trading Initiative

HOSDB – Home Office Scientific Development Branch

ICCPR – International Covenant on Civil and Political Rights

ICESCR – International Covenant on Economic, Social and Cultural Rights

ILO – International Labour Organisation

ISO – International Organisation for Standardisation

ISO 14001 – International Environmental Standard Certification

ISO 9001 – Quality Management Certification

MoD – Ministry of Defence

MoJ – Ministry of Justice

NAP – National Action Plan on Business and Human Rights

NIJ – National Institute of Justice

OEKO-TEX – Independent Testing and Certification System for Raw, Semi-Finished Textile Products

OHSAS 18001 – International Standard for Health and Safety Management Systems

PECAL 2110 – NATO requirements for ensuring quality in design, development, and production

PN-P-18001 – Polish Occupational Health and Safety System

SA8000 – Corporate Social Responsibility and Ethical Supply Chain Management Certification Standard

SATRA – Independent research and testing organisation

SEDEX – Supplier Ethical Data Exchange

SMETA – SEDEX Members' Ethical Trade Audit

TfL – Transport for London

TRACE certification – Anti-bribery due-diligence standard

UDHR – Universal Declaration of Human Rights

UN CEDAW – UN Convention on the Elimination of All Forms of Discrimination Against Women

UN CERD – UN Committee on the Elimination of Racial Discrimination

UNCRC – UN Convention on the Rights of the Child

UNE 166002 – Spanish Standard for Research & Development & Innovation Policies

UNGPs – UN Guiding Principles on Business and Human Rights

WRAP – Worldwide Responsible Accredited Production Certification Programme

EXECUTIVE SUMMARY

Background

Risks of severe labour, environmental, and human rights abuses in the apparel manufacturing sector have been extensively documented for the last forty years. Common issues have included unsafe factories, extremely low wages, and the denial of labour rights such as collective bargaining and social security. Campaigners have long called for greater transparency around business practices and supply chains to help address exploitative practices and associated abuses. Recently, campaigners have turned their attention to the opportunities offered by the public procurement process to improve supply chain transparency and adherence to international standards.

Every year, the U.K. public sector purchases a huge volume of apparel, such as uniforms for staff in prisons, hospitals, the emergency services, and the armed forces, and including protective clothing, footwear, socks, gloves, and bags. While no single figure is available for spend on apparel, in financial year 2013 / 2014 total Ministry of Defence Clothing Team spend on uniforms / clothing was £64.7 million, while U.K. Ambulance Trusts spend an estimated £3.2 million per annum on uniforms.

The EU Public Contracts Directive 2014, transposed into U.K. law via the Public Contracts Regulations 2015, offers space to public buyers both to exclude suppliers who violate social and labour laws, and to use contract management to monitor human rights compliance throughout the contract term. The U.K. government is committed to implementing the UN Guiding Principles on Business and Human Rights (UNGPs), and in 2015, introduced a requirement for all companies with a turnover of more than £36 million to publish an annual Slavery and Human Trafficking statement setting out what actions they have taken to ensure their operations and supply chains are slavery-free. Despite this, the government has not yet taken full advantage of the opportunity offered by the Public Contracts Regulations to advance the protection of human rights and improve standards in supply chains. There is significant scope for public authorities to use the procurement process to incentivise companies bidding for contracts to carry out human rights due diligence and to improve levels of transparency about their supply chains and ethical practices and policies.

The Report

After a brief introduction in Section I, Section II of the report explores and critiques the U.K.'s legal and policy framework on public procurement in relation to business and human rights, responsible procurement, and supply chain transparency. Next, Section III examines the degree to which companies contracted to supply apparel for

use in the U.K. public sector disclose information about their supply chains, including countries of production and adherence to international labour and human rights standards. A summary of key findings and list of recommendations are laid out in Sections IV and V respectively.

The report focuses on thirty companies that were awarded significantly-sized contracts by the Ministry of Defence (MoD), the Ministry of Justice (MoJ), Transport for London (TfL), and the Crown Commercial Service (CCS) in the period 2013-2016 and examines the information on their websites about their human rights and ethical standards and their suppliers. We also note whether the companies have published a Slavery and Human Trafficking statement. Many of the companies are small and medium-sized enterprises (SMEs), though some are part of larger corporate groups. It should be noted that some of these contracts would have been agreed prior to the commencement of the Public Contracts Regulations 2015.

The report does not allege that any of the named companies have labour and / or other human rights abuses in their supply chains.

Summary of Findings

- 1) Only ten of the thirty companies have published a Slavery and Human Trafficking statement:** Arco, Beresden, Dimensions-MWUK, and Bunzl (Greenham Trading) have published their own statements. A further six companies have published their parent company's statement: Ballyclare (Uniform Brands); James Boylan Safety & Romar Innovate (JBS Group); Marlborough Communications (Cohort Plc); and Cooneen Defence and Cooneen Protection (Cooneen Group).
- 2) Fourteen of the thirty companies appear to be outside of the scope of the Modern Slavery Act reporting requirement:** The fourteen companies appear to have annual turnover below £36 million, meaning they are not required to publish a statement. We were unable to ascertain the turnover of the remaining six companies.
- 3) Making publication of a Slavery and Human Trafficking statement a requirement for companies bidding for public contracts is of limited value in respect of SMEs:** The government has set a target for 33% of procurement spend to reach SMEs by 2020, either directly or via another larger contractor through its supply chain. One element of the government's definition of an SME is turnover less or equal to £39 million. This suggests that a significant proportion of companies being awarded government contracts are likely to fall below the £36 million threshold for reporting under the Modern Slavery Act.
- 4) Companies disclose little detail on production locations:** Eighteen of the identified contractors provide no detail on their websites about suppliers or sourcing countries, with the remainder providing general information only. Suppliers and production locations include: China, Turkey, Indonesia, Bangladesh, Dubai, Sri Lanka,

Tunisia, India, Morocco, Ireland, Pakistan, Cambodia, Malaysia, Vietnam, Taiwan, The Philippines, Australia, the United States, the U.K. (with specific reference in one case to Wales), Sweden, and Germany. Fifteen companies make general references to their suppliers and manufacturers meeting their standards, but there is limited information provided on how companies ensure that standards are maintained in their supply chains and operations. None of the companies publish more specific information such as factory names and addresses.

5) Disclosures on ethical practices are limited to lists of standards and policies:

Most of the companies featured in the report (twenty-one out of thirty) make some reference on their websites to corporate social responsibility, sustainability, and / or ethical standards, and all but seven mention some form of quality standard accreditation. The most frequently cited accreditations are the ISO 9001 and ISO 14001. Some companies refer to ethical trading policies, health and safety policies, corporate social responsibility policies, and equality or diversity Policies, but fifteen of the identified company policies are fairly general in nature. Of the thirty companies studied in this report, only one referred to conducting due diligence.

6) Government procurement guidance is contradictory and lacking practical information:

The EU Public Contracts Directives 2014 allow public buyers considerable scope to use the procurement process to advance the protection of human rights, but the government's guidance to public buyers on the social and environmental aspects of the new rules is confusing, contradictory, and does not provide useful practical information.

7) In comparison to the central government departments featured in this report, TfL's procurement practice is significantly more socially responsible and advanced:

TfL is the only one of the four authorities considered in this report to have published its own Slavery and Human Trafficking Statement. In June 2017, the Mayor of London published a Responsible Procurement Policy for the Greater London Authority and the functional bodies, including TfL. By contrast, neither the MoD nor the MoJ make any reference to responsible procurement on their procurement information webpages, nor have they published statements in accordance with the supply chain reporting requirement in the Modern Slavery Act.

Conclusions

The companies studied in the report were awarded significantly-sized contracts to supply apparel to public authorities, but in many instances information on their corporate structures and supply chains is not available on their website, and most had made few, if any, meaningful human rights or ethical commitments publicly. Of the thirty companies studied in this report, only one referred to conducting due diligence. Most of the companies studied publish only very general, or no, information on the sourcing of their products. Although it was clear from the limited information available that the companies do source from countries with weak labour protections

and known business-related human rights violations, there was little evidence of the efforts made to ensure the production facilities they purchase from had sufficiently high labour standards.

One issue that exacerbated this problem was the reporting framework in the U.K. The reporting requirement under the Modern Slavery Act leaves companies free to include the information they think appropriate, but this often results in insufficiently detailed modern slavery statements. In addition to this, many of the companies featured in the report fall below the revenue threshold and are not required to report under the Act.

The UNGPs restate the obligation on States to protect against human rights abuse, including by business enterprises, and provide that States should promote respect for human rights by business enterprises with which they conduct commercial transactions. Based on this sample of thirty companies, the U.K. government should be doing more to ensure its contractors are more transparent and are meeting their responsibility to respect human rights. The U.K. legal framework for public sector procurement is complex, but as the overview in this report demonstrates, there is significant scope for public authorities to improve the levels of transparency and responsibility in the companies from which they procure.

RECOMMENDATIONS

The U.K. government should:

- Revise “The Public Contracts Regulations 2015: Guidance On Social and Environmental Aspects” in consultation with civil society organisations, academics with expertise in socially responsible procurement, and procurement professionals. The revised Guidance should include practical examples for public buyers on protecting human rights and labour rights in their supply chains, with a particular focus on human rights due diligence. The revision should include information on:
 - » How to use contract conditions and contract management activities to monitor human rights compliance and impose new obligations on contractors to conduct human rights due diligence as required by the UNGPs, cooperating with the customer as necessary and appropriate, throughout the contract term;
 - » How to factor human rights considerations into the tender evaluation when they relate to the way in which the products and services are produced; and
 - » How to use the full range of mandatory and discretionary exclusion grounds, including violations of related international law and collective agreements.
- Create an online database with information about the human rights practices of suppliers.
- Invest in human rights training for public buyers.
- Implement the recommendations of the UN Working Group on Business and Human Rights’ report on opportunities for SMEs in the implementation of the UNGPs, particularly by:
 - » Providing dedicated support for SMEs in the implementation of the UNGPs; and
 - » Embedding the standards of the UNGPs into existing processes and platforms for supporting SMEs.
- Engage with industry bodies such as the Federation of Small Business to establish ways to meet the challenges of respecting human rights faced by SMEs.
- Require all central government departments and public bodies with a turnover of more than £36 million to publish an annual slavery human trafficking

statement to improve transparency about their supply chains, risks of labour rights abuses, and the steps they are taking to ensure adherence to international labour rights standards.

- Consider introducing a requirement for all entities bidding for public contracts over a certain value to publish a Slavery and Human Trafficking statement, irrespective of turnover.
- Amend § 54 of the Modern Slavery Act to remove the option for entities to report that they have taken no steps to address slavery and human trafficking.

Businesses contracted by public buyers to supply goods and services should:

- Remember their status as recipients of public money and the responsibilities that entails. Public contractors should openly commit to and comply with human rights, social, and environmental standards, including the UNGPs and the OECD Guidelines for Multinational Enterprises. The UNGPs state that the Principles apply “to all business enterprises, both transnational and others, regardless of their size, sector, location, ownership and structure,” while SMEs are encouraged to follow the Guidelines “to the fullest extent possible.”¹
- Ensure compliance with their legal obligations under § 54 of the Modern Slavery Act to publish an annual Slavery and Human Trafficking statement in a prominent place on their website homepage. The statement must be approved by the board of directors (or equivalent management body) and signed by a director (or equivalent). This recommendation equally applies to those companies above the specified total turnover that are only covered by a statement published by their parent company. Government guidance clarifies that each company above the threshold must publish a statement.
- Follow government guidance on reporting under the Modern Slavery Act, which includes disclosing on all information prescribed under § 5.2 of the Guidance.
- Engage with their own suppliers throughout their supply chains, without simply passing on the responsibility to their primary suppliers to identify and mitigate human rights and labour abuses in their respective supply chains.
- Disclose details on their corporate structure and any subsidiaries, sites of production (including name and full address of manufacturing facilities), and supply chains, paying particular attention to known high-risk areas.

I. INTRODUCTION

A. Background

The earliest industrialised apparel production in Britain was synonymous with dangerous working conditions, poverty wages, and child labour. Following the efforts of reformers, legislation introduced in the late nineteenth and early twentieth centuries outlawed exploitative practices, and trade unions secured further gains on pay and working conditions. The steady decline in domestic textile manufacturing began in the late 1970s. Output fell by 65 per cent between 1979 and 2013, and jobs in the textile industry fell by 90.1 per cent (from 851,000 to 85,000), as companies began to offshore production, particularly to Asia where the textiles, clothing, and footwear sector has expanded rapidly in the last forty years.²

This growth created employment gains for developing countries, but the jobs came at a cost. Risks of severe labour, environmental, and human rights abuses in the apparel manufacturing sector have been extensively documented for the last forty years, with common issues including unsafe factories, extremely low wages, and denial of labour rights such as collective bargaining and social security.³ There is also evidence that dangerous practices have now re-emerged in the U.K., as some manufacturers exploit vulnerable workers in an attempt to compete with lower-cost overseas production, prompting major high-street retailers to reduce their use of U.K. factories.⁴

While no single solution exists, campaigners have long called for greater transparency around business practices and supply chains to help address exploitative practices and associated abuses. Transparency can ensure identification of companies whose products are made in factories where workers' rights are abused. This can enable workers, unions, and civil society organisations to put pressure on companies buying from these locations to take steps to end abusive practices and ensure workers have access to remedies.

Less than twenty years ago, no major apparel company published its global supplier factories network. The companies viewed the identity of supplier factories as sensitive business information and believed disclosure would put them at a competitive disadvantage. In the late 1990s and early 2000s, following a campaign at dozens of U.S. universities led by a campus network (United Students Against Sweatshops), major apparel brands Nike and Adidas began disclosing the names and addresses of factories that produced U.S. collegiate apparel. Universities began to include supply chain disclosure as part of their licensing agreements with top athletic apparel companies that produced their college logo apparel, some even requiring licensees to disclose names and addresses of manufacturers. Subsequently, in 2005, Nike and Adidas went further by publishing information about their supplier factories for all products—not just collegiate licensed apparel.⁵

Since then, and particularly in the aftermath of the Rana Plaza factory collapse in 2013, transparency campaigns have tended to focus on major consumer brands, with less attention paid to companies that supply apparel to public bodies. Yet public buyers remain major players in the apparel market. Every year, the U.K. public sector purchases a huge volume of apparel, such as uniforms for staff in prisons, hospitals, the emergency services, and the armed forces, and including protective clothing, footwear, socks, gloves, and bags. While no single figure is available for U.K. government spend on apparel, in financial year 2013 / 2014 total Ministry of Defence Clothing Team spend on uniforms / clothing was £64.7 million,⁶ while U.K. Ambulance Trusts spend an estimated £3.2 million per annum on uniforms.⁷ When companies are not public-facing, it may be that public purchasing is a more appropriate mechanism for promoting responsible business conduct than reputation-risk based campaigns.

This buying now takes place in the context of the U.K.'s commitment to implement the UN Guiding Principles on Business and Human Rights (UNGPs) and the Public Contracts Regulations 2015. The UNGPs outline the State duty to protect human rights, the business responsibility to respect human rights, and the right of victims of business-related human rights abuses to access remedy. Of particular relevance, Principle 6 advises States "...to promote respect for human rights by business enterprises with which they conduct commercial transactions." The commentary notes that commercial activities with business provide unique opportunities to promote awareness and respect for human rights among companies. Public buyers must also follow the procedures laid down in the Public Contracts Regulations 2015, which give effect to the EU Public Contracts Directives 2014. The Directives revised the European Union's procurement rules, in part to enable procurers to make better use of public procurement in support of common societal goals, and include a requirement for buyers to exclude suppliers who have violated certain social, labour, and environmental laws.⁸

This report aims to: 1) explore the U.K. government's adherence to its duty to protect human rights in the context of public procurement by examining relevant policy and legal frameworks; and 2) examine levels of transparency about human rights and ethical commitments, sourcing practices, and production locations among thirty companies contracted to supply apparel by three U.K. government departments (the Ministry of Defence (MoD), the Ministry of Justice (MoJ), and Crown Commercial Services (CCS)) and the Greater London transport authority (Transport for London (TfL)).

B. Methodology

Targeted searches of Tenders Electronic Daily (TED)⁹ (a database of European public procurement contracts) were conducted to identify details of awarded contracts, using a date range of 18 January 2013 to 5 June 2017. Entries were then cross-checked

on DgMarket Tenders Worldwide, which covers procurement outside the EU.¹⁰ This was supplemented with a Freedom of Information request to TfL. Because of the date range used, not all contracts awarded were covered by the Public Contracts Regulations 2015, which came into effect in February 2015.¹¹ Other contracts were covered by the Public Contracts Regulations 2006, which transposed EU Directive 2004 / 18.

Next, company websites were searched for references to commitments to human rights and labour rights standards, and for information on production locations. Company annual reports and accounts were reviewed, where available, to establish whether companies fall within the scope of the Transparency in Supply Chains reporting requirement in the U.K. Modern Slavery Act.

A short survey was sent to all the companies analysed in the report requesting information on their supply chains and on any policies and procedures they might have with regards to identifying and preventing labour abuses and any other human rights risks in their supply chains. Only one company (Arco) completed and returned the survey. Information provided in Arco's response is included below. Two companies (Wyedean Weaving Co. and Eurosafe Limited) declined to take part in the survey whilst the remaining twenty-seven did not respond.

References in the text to specific corporate practices (for example, the use of certification schemes) should not be interpreted as an endorsement of those practices. Indications in the text of our inability to locate documents should not be read as inferences that the documents do not exist. We may have overlooked documents or the content of documents and web pages, and we are happy to make this clear on our website if it is drawn to our attention.

C. Structure of This Report

Section II provides an overview and assessment of the U.K. policy and legal framework on business and human rights, procurement, and supply chain transparency. Section III looks at companies awarded contracts to supply apparel to the MoD, the MoJ, TfL, and the CCS. A brief description of each company is followed by a summary of the information that they publish on their supply chains and their commitments to ethical standards, as well as an overview of their Slavery and Human Trafficking statement, where available. The main findings and conclusions can be found in Section IV, while key recommendations can be found in Section V.

II. THE POLICY AND LEGAL FRAMEWORK

This section provides an overview of laws and policies relevant to the subject of the report, namely: the EU Public Contracts Directive 2014; the Transparency in Supply Chain reporting requirement in the Modern Slavery Act; and the U.K.'s commitment to implement the UNGPs.

The legal framework for public sector procurement in the U.K. is determined by highly complex, interlinked directives, regulations, policies, and guidance. CCS, an executive agency of the government's Cabinet Office (the department charged with ensuring the effective running of government and, with HM Treasury, the corporate headquarters for government) leads on procurement policy.¹² Much procurement, however, remains decentralized: central government, non-ministerial departments, executive agencies, non-departmental public bodies, local government, and health and education entities all enter into their own contracts with suppliers, each of which is covered by varying requirements and policy commitments. Meanwhile, the overriding procurement policy requirement is that all public procurement must be based on value for money, defined as “the best mix of quality and effectiveness for the least outlay [lowest cost] over the period of use of the goods or services bought.”¹³

A. The EU Public Contracts Directive 2014

Public contracts exceeding certain thresholds must be awarded according to procedures set out in the EU Public Contracts Directive 2014,¹⁴ which was transposed into U.K. law via the Public Contracts Regulations 2015.¹⁵ One aim of the Directive is to enable procurers to make better use of public procurement in support of common societal goals. The preamble to the Directive sets out that “[EU] member States and contracting authorities [should] take relevant measures to ensure compliance with obligations in the fields of environmental, social and labour law,”¹⁶ including local laws and obligations stemming from international agreements, including Convention 29 on Forced Labour, Convention 105 on the Abolition of Forced Labour, and Convention 182 on the Worst Forms of Child Labour.¹⁷

The Directive advises that “relevant obligations could be mirrored in contract clauses” and “non-compliance with the relevant obligations could be considered to be grave misconduct on the part of the economic operator concerned, liable to exclusion of that economic operator from the procedure for the award of a public contract.”¹⁸ It provides considerable scope to public buyers by setting out that “[c]ontrol of the observance of the environmental, social and labour law provisions should be performed at the relevant stages of the procurement procedure, when applying the general principles governing the choice of participants and the award of contracts, when applying the exclusion criteria and when applying the provisions concerning abnormally low tenders.”¹⁹

The Directive continues that:

“... contracting authorities should be allowed to use award criteria or contract performance conditions relating to the works, supplies or services to be provided under the public contract in any respect and at any stage of their life cycles from extraction of raw materials for the product to the stage of disposal of the product, including factors involved in the specific process of production, provision or trading and its conditions of those works, supplies or services or a specific process during a later stage of their life cycle, even where such factors do not form part of their material substance ... this also includes award criteria or contract performance conditions relating to the supply or utilisation of fair trade products in the course of the performance of the contract to be awarded. Criteria and conditions relating to trading and its conditions can for instance refer to the fact that the product concerned is of fair trade origin, including the requirement to pay a minimum price and price premium to producers.”

This is caveated by a provision requiring that the award criteria or contract performance conditions can be shown to be linked to the subject matter of the contract. This means that contracting authorities cannot require tenderers to have general corporate social or environmental responsibility policies in place.²⁰

Under the Directive award criteria or contract performance conditions concerning social aspects of the production process relating to the works, supplies, or services must be provided under the contract. The Directive provides examples of contract performance conditions that might be intended to favour the implementation of a range of measures, including compliance in substance with fundamental International Labour Organisation (ILO) Conventions.²¹

B. U.K. Government Guidance and Procedures Related to Responsible Procurement

Following the entry into force of the Public Contracts Regulations 2015, the government published guidance for public sector buyers on the Regulations’ social and environmental aspects. The guidance includes sample contract clauses to give contracting authorities the scope to terminate contracts if suppliers fail to comply with environmental, social, or labour laws, and to give contracting authorities and contractors the same rights over subcontractors.²² As part of the 2017 / 2018 audit plan, the government Internal Audit Agency intends to undertake a review of the clauses contained within procurement contracts to assess compliance.²³

Unfortunately, the Guidance lacks clarity, with much of it simply repeating the language of the Directive. It provides no practical information for buyers on how to check suppliers' and subcontractors' compliance with relevant social and environmental requirements, how to assess how far down the supply chain checks should be conducted, and how to determine whether such checks are proportional. The Guidance also unhelpfully suggests that there may be valid reasons for companies not to publish a statement in compliance with the Modern Slavery Act, and leaves it to the discretion of buyers to consider whether the gravity and particular circumstances of the non-compliance justifies exclusion from the procurement process. There are no details on how this should be assessed, or on possible valid reasons for non-compliance. The Guidance also states that “[t]here are new obligations in the Regulations that require procurers to take certain actions to ensure compliance with various international laws” but it is not clear what the consequences would be in the event of a public buyer failing to ensure compliance as described.²⁴

The government has also published a Supplier Code of Conduct as a statement of good practice summarising how suppliers to government should behave.²⁵ The Code states that suppliers must comply with all human rights and employment laws in the jurisdictions in which they operate and “have robust means of ensuring that the subcontractors in their supply chain also comply,” which also includes complying with the provisions of the Modern Slavery Act. While the Code makes references to the government’s expectation that suppliers “act in a manner that . . . opens up the market to small and medium-sized enterprises,” it does not provide specific information for SMEs on, for instance, conducting due diligence throughout their supply chains. Nor does the Code mention the UNGPs or the NAP.²⁶

C. Modern Slavery Act 2015: Transparency in Supply Chains Reporting Requirement

Section 54 of the Modern Slavery Act 2015, the Transparency in Supply Chains (TISC) clause requires all commercial organisations with a turnover of more than £36 million operating in the U.K. to publish an annual Slavery and Human Trafficking statement, setting out the steps they have taken to identify, mitigate, and prevent slavery and human trafficking in their supply chains. Government guidance on the reporting requirement recommends that the statement should include information on the organisation’s structure and supply chains, including reference to areas of particular risk, actions to manage risk, and policies and due diligence processes in relation to slavery and human trafficking in its business and supply chains. Statements must be approved by the board of directors, signed by a director or senior manager, and published in a prominent place on the homepage of the company’s website.

Public authorities are not explicitly required to report under the Act, but some have done so. Statements from forty-two public or semi-public authorities are available

on the Modern Slavery Registry, mostly from local authorities with others including National Health Service Trusts, the Greater London Authority, TfL, and the Forestry Commission. The process of preparing a statement has the potential to promote responsible procurement practices because it encourages the tendering authority to map its supply chain beyond tier one suppliers, and to identify and address the risk factors that contribute to slavery, human trafficking, and other severe labour rights violations.

The CCS Standard Selection Questionnaire provided to bidders for public contracts has been amended to include a question to ascertain whether or not the bidder has published an annual Slavery and Human Trafficking statement, if required.²⁷ Making non-publication of a Slavery and Human Trafficking statement grounds for excluding a company from bidding for government contracts is likely to have the effect of improving compliance with the TISC reporting requirement. However, the absence of any quality control over statements may limit the ultimate effect on standards in supply chains. Furthermore, this approach is of limited use when it comes to engaging with SMEs (defined by government as having turnover below £39 million), because many are likely to have turnover below £36 million, meaning they are out of scope of TISC unless they are part of a larger corporate group. This is of particular significance in the context of the Cabinet Office target for £1 in every £3 of government spend to go to small businesses by 2020.

The Department of Health is understood to be in discussion with the Home Office about a new Procurement Policy Note on Modern Slavery, to provide guidance on best practice.²⁸

D. UN Guiding Principles on Business & Human Rights

In 2013 the government published its National Action Plan (NAP) to implement the UNGPs and published an updated version in 2016. The NAP expresses the government's commitment to the UNGPs, which outline the State duty to protect human rights and the business responsibility to respect human rights. Guiding Principle 6 outlines that "States should promote respect for human rights by business enterprises with which they conduct commercial transactions." The commentary to the Principle states:

"States conduct a variety of commercial transactions with business enterprises, not least through their procurement activities. This provides States – individually and collectively – with unique opportunities to promote awareness of and respect for human rights by those enterprises, including through the terms of contracts, with due regard to States relevant obligations under national and international law."

The 2013 NAP committed the government to “ensuring that in UK Government procurement human rights related matters are reflected appropriately when purchasing goods, works and services.” In the 2016 update, this was replaced with a weakened commitment to “Continue to ensure that procurement rules allow for human rights-related matters to be reflected in the procurement of public goods, works and services.” A cross-departmental Steering Group is responsible for monitoring the implementation of the NAP. It is not clear whether the Cabinet Office and / or CCS is represented on this group.²⁹

None of the U.K. government documents reviewed above make reference to the NAP or to a recent report from UN Working Group on Business and Human Rights on the challenges and opportunities for SMEs. The report includes a recommendation to governments to integrate the UNGPs in business relationships with SMEs by requiring respect for human rights in public procurement processes.

In 2016, the U.K. Parliament’s Joint Committee on Human Rights (JCHR) conducted an inquiry to consider progress made by the U.K. Government in implementing the UNGPs. The JCHR expressed the view that public sector procurement processes, and the weight that human rights considerations are given within them, can be used as a metric to evaluate the government’s commitment to human rights and business. The JCHR noted that “...procurement officers do need clear and unambiguous messages: they cannot be expected to take human rights considerations into account if they are confused about the rules, especially in a process that is often subject to legal challenge and where, as a result, rules have to be followed to the letter.” The JCHR criticised the government’s Guidance on the social and environmental aspects of the Public Contracts Regulations 2015 as “complicated and contradictory”, and made a number of recommendations including that central and local government procurement officers should be able to exclude companies that have not undertaken human rights due diligence from all public sector contracts.³⁰

III. DISCLOSURES OF SUPPLY CHAIN STANDARDS: ASSESSMENT OF APPAREL CONTRACTORS

This section examines the extent to which companies contracted to supply apparel by the MoD, the MoJ, the CCS, and TFL between 2013 and 2016 provide information on their websites about their supply chains and ethical standards. We also note whether the companies have published a Slavery and Human Trafficking statement.

A. Ministry of Defence Contractors

The research examined ten companies awarded fifteen contracts by the MoD between 2013 and 2016 for the supply of defence apparel, including military uniforms, protective and safety clothing, shirts, gloves, berets, socks, and rucksacks. The total value of these contracts was just under £64.5 million. These companies are mainly U.K.-based SMEs. The official webpage with information on MoD procurement makes no reference to ethical standards.³¹

1. Turner Virr

Company Overview and Production Locations: Turner Virr & Co Ltd., a West Yorkshire-based firm, is a specialist uniform supplier owned by the Hobson & Sons (London) Ltd Group. In 2014, Turner Virr was awarded two contracts by the MoD and one by the Joint Support Chain/Logistics Support Chain (JSC/LSC) Defence Clothing Team of a total value of £14,938,777 for the supply of military uniforms. In 2015, the MoD awarded the company another contract for uniforms valued at £390,000. The firm states that it uses “a combination of owned U.K. manufacturing sites and large overseas manufacturing partners.” No information is provided on where these partners are based.³²

Commitments to Ethical Standards: Turner Virr states that it defines corporate social responsibility as “building good relationships with employees, suppliers, local organisations and the wider society. In addition to meeting the requirements of legislation, this also requires voluntary actions to achieve best practices.”³³ “Corporate social responsibility requires the business to be built on the principles of sustainable development and Turner Virr encourages its customers, suppliers and employees to follow these principles, as best guarantee of long term success.”

The company website states that it follows the basic requirements of the Ethical Trading Initiative (ETI) Base Code but the company is not listed as a member on the

ETI website. The company's website states that representatives regularly visit the premises of major suppliers for meetings, audits, and inspections.³⁴ It also states that the company has the ISO 9001 and that it assists its suppliers to obtain accreditations through technical assistance and resources.

Turner Virr states that it has implemented policies and procedures to meet the requirements of ISO 14001 and that it successfully gained the accreditation in 2008. The company has an environmental policy and an environmentally-preferable purchasing policy.

Modern Slavery Act Statement: The turnover amount shown in the most recently available annual report and accounts suggests that the company falls below the threshold for the Modern Slavery Act supply chain reporting requirement.³⁵

2. TW Kempton

Company Overview and Production Locations: TW Kempton (Corporate Clothing) Limited, an English company, supplies a wide range of military, corporate and uniform clothing worldwide. TW Kempton are manufacturers and suppliers of the Woolly Pully and other knitted garments to the British Army, Royal Air Force, and Royal Navy.³⁶ In 2016, the MoD awarded TW Kempton a contract valued at £13,700,000 for the supply of berets. The company website does not mention production locations.

Commitments to Ethical Standards: The company's website does not refer to any ethical standards, only mentioning the existence of Quality Control.

Modern Slavery Act Statement: The company's accounts indicate it is a small company that is below the threshold for the Modern Slavery Act supply chain reporting requirement.³⁷

3. Marlborough Communications Limited

Company Overview and Production Locations: Marlborough Communications Ltd (MCL), an English company, supplies advanced electronic and surveillance technology. The company states that it develops this technology in-house or sources it from worldwide partners but does not mention who these partners are or where they are located.³⁸ In 2015, the MoD awarded MCL a contract valued at £11,240,836 for the supply of protective gear.

Commitments to Ethical Standards: MCL states that it is "committed to the consistent delivery of quality solutions and enhanced levels of customer satisfaction."³⁹ The company also has Preferred Supplier status with many of its customers. The company is TRACE certified.⁴⁰

Modern Slavery Act Statement: MCL's accounts indicate that the company falls below the threshold for the Modern Slavery Act supply chain reporting requirement.⁴¹ Cohort Plc, MCL's parent company, published a Modern Slavery Statement for the fiscal year ending 30 April 2016.⁴² This statement is general and states that the company does not have modern slavery risks.

4. Wyedean Weaving Co.

Company Overview and Production Locations: Wyedean Weaving is a private limited company based in Haworth, England. The company manufactures military uniforms, braid, insignia, regalia, and accoutrement. In 2013, the MoD clothing team DE&S awarded the firm a contract valued at £4,887,614 for the supply of clothing accessories. This was one of only two award notices that listed "supply chain" and "sustainability" in the award criteria. The company was once a manufacturer, but today only some of its manufacturing is done in-house. The business' focus now is managing its suppliers and importing goods.⁴³ The company states that it has "strong ties with numerous off-shore facilities, across multiple continents."⁴⁴ No further detail is provided.

Commitments to Ethical Standards: The company states that it maintains "high standards" with all of its international suppliers "through daily communications and regular visits and consultations."⁴⁵ It states that its close working relationships with its suppliers allow it to offer competitive pricing while guaranteeing high standards of manufacture (i.e., product quality). The company is accredited with ISO 9001 and ISO 14001 and is Investors in People certified, recognising the company's commitment to supporting the development and progression of all staff through formal, best practice management.⁴⁶

Modern Slavery Act Statement: The company has accounts for a small company which indicate that it falls below the threshold for the Modern Slavery Act supply chain reporting requirement.⁴⁷

5. Cooneen Defence

Company Overview and Production Locations: Cooneen Defence Ltd is part of the Cooneen Group of companies, which specialises in product design and development in the military and police clothing markets. In 2014, the JSC / LCS Defence clothing team awarded the firm a £4,610,351 contract for the supply of socks. The company states that it has highly experienced sourcing and technical teams working at their manufacturing facilities in Europe, Asia, and the U.K.⁴⁸

Commitments to Ethical Standards: The company states that its products meet National Institute of Justice (NIJ), Home Office Scientific Development Branch (HOSDB), and ISO standards. The company states that it operates a strict quality control system that is independently accredited to ISO 9001. The company also states

that all its manufacturing partners are subject to “incredibly strict, robust and routine audits” carried out by internal audit teams based overseas.

Other commitments are made at the group level (Cooneen Group). The Group undertakes to “provide, or ensure the provision of safe, humane and healthy working conditions throughout the supply chain.”⁴⁹ It commits itself to the SA8000 (Social Accountability International) Standard and to all applicable legislation on the commitment to continually improve all aspects of their Corporate Social Policies and Management Systems.⁵⁰ The Group lists a number of international instruments that it undertakes to respect and comply with, including the ILO Conventions; the Universal Declaration of Human Right; the International Covenant on Economic, Social and Cultural Rights; the International Covenant on Civil and Political Rights; the UN Convention on the Rights of the Child; the UN Convention on the Elimination of all Forms of Discrimination against Women; and the UN Convention on the Elimination of All Forms of Racial Discrimination.⁵¹ The Group states that all its companies are members of SEDEX, which the Group states indicates their willingness to share information and ‘utilise this information to help manage and improve ethical standards within the supply chain.’⁵²

Modern Slavery Act Statement: Cooneen Defence has an annual turnover for a medium company which suggests that the company is below the threshold for the Modern Slavery Act supply chain reporting requirement.⁵³ The Cooneen Group published a statement in 2017 which repeats much of the information available on its website.⁵⁴ The Group also published a statement in 2018.⁵⁵

6. UNIFEQ Europe

Company Overview and Production Locations: UNIFEQ Europe is a Poland-based company. With UNIFEQ China it forms the UNIFEQ Group. In 2016, the MoD awarded UNIFEQ Europe a contract valued at £4,585,857 for the supply of shirts. The company states that it cooperates with blue chip forwarding (i.e., transportation) companies in its supply chain section, but does not mention production locations.⁵⁶

Commitments to Ethical Standards: The company is certified with various quality control certificates such as ISO 9001, AQAP 2110, ISO 14001, and PN-P-18001.

The company states that it works only with suppliers who are ISO 9001-certified manufacturers and that its supply plants are certified with ISO 9001, ISO 14001, OEKO-TEX, BSCI, WRAP, and SMETA.⁵⁷

The UNIFEQ Group states that the manufacturing plants it works with are certified to ISO 14001, and that it is committed to implementing environmental practices in its business activities.⁵⁸ One of the examples provided to illustrate this commitment is its work sorting waste and using energy-saving solutions.

Modern Slavery Act Statement: UNIFEQ Europe does not have a discoverable record on the Companies House website. We are therefore unable to ascertain whether the firm falls within the scope of the reporting requirement.⁵⁹

7. Iturri Limited

Company Overview and Production Locations: Iturri Limited, based in Oxfordshire, is part of the Iturri Group, which focuses on the manufacture and distribution of technical clothing, military footwear, and firefighting vehicles. The Iturri group has twenty-five international offices but its website provides limited information on its supply chain, stating that it has clothing factories in Morocco and that its purchasing platform is in Asia.⁶⁰ The MoD awarded Iturri Limited a £1,722,446 contract in 2014 for gloves. In 2016 it also awarded Iturri Limited another contract valued at £2,140,000 to supply clothes. In 2015, the JSC / LCS Defence clothing team awarded the firm a contract to supply protective and safety clothing, valued at £740,761. In total, the firm was awarded contracts of £4,603,207.

Commitments to Ethical Standards: The Group states that it implements an integrated Management System for Quality, Environment and Occupational Risk Prevention and Management of Research, Development and Innovation attested by certifications such as ISO 9001, PECAL 2110, ISO 14001, OHSAS 18001, SA8000, and UNE 166002.⁶¹ The company has also obtained accrediting certifications from Entidad Nacional de Acreditación / The Spanish National Accreditation Entity (ENAC).⁶² The Group supports the Spanish Quality Association and collaborates with laboratories in testing the quality of their products.

The Group states that the promotion of the human rights of workers around the world is crucial for the sustainability of its business.⁶³ Its website indicates that the group has obtained the SA8000 standard, which addresses matters including child labour, forced and compulsory labour, health and safety, freedom of association and collective bargaining, discrimination, disciplinary practices, working hours, and remuneration.

Modern Slavery Act Statement: Iturri has small company accounts suggesting that the company is below the threshold for the Modern Slavery Act supply chain reporting requirement.⁶⁴

8. Police Resources International

Company Overview and Production Locations: Police Resources International Ltd is a Devon-based company that supplies specialist military police clothing and equipment. The firm's website does not mention its production locations. In 2013, the MoD clothing team DE&S awarded Police Resources International a contract valued at £2,970,269 for the supply of rucksacks.

Commitments to Ethical Standards: The company is accredited with the ISO 9001 and ISO 14001.⁶⁵ The company states that it is committed to the principle of “continuous improvement of our environmental performance and prevention of pollution.”⁶⁶ It also maintains that it regularly reviews, complies with or exceeds applicable legal and other requirements while minimising waste and resource consumption.⁶⁷

Modern Slavery Act Statement: The company has small company accounts, suggesting that it is below the threshold for the Modern Slavery Act supply chain reporting requirement.⁶⁸

9. Kashket & Partners

Company Overview and Production Locations: Kashket & Partners Ltd is a London-based company that is part of the wider Kashket Group.⁶⁹ The company provides uniforms for both military and private clients. In 2014, the MoD awarded the firm a contract valued at £1,358,599 for the supply of military uniforms. Kashket & Partners operate a tailoring facility in London. They mention that their sister company Firmin & Sons operates entirely under one roof, but it is not clear if this is also the case with Kashket & Partners.

Commitments to Ethical Standards: The Kashket Group holds ISO 9001 and SA8000 certifications. It states that it is currently working to achieve ISO 14001 certification.⁷⁰ In terms of suppliers, the company mentions two U.K.-based factories that produce most of its products, but says that it also “uses offshore suppliers when customers request us to do so and only if they conform to our high ethical, environmental and quality standards.”⁷¹ One source states that the Group planned to establish uniform manufacturing capability in Ghana.⁷²

Modern Slavery Act Statement: The company has small company accounts, suggesting that the company is below the threshold for the Modern Slavery Act supply chain reporting requirement.⁷³ Kashket Group also has small company accounts.⁷⁴

10. OK Hungarian Gloves

Company Overview and Production Locations: OK Hungarian Gloves is a Hungary-based company.⁷⁵ In 2014, a JSC / LCS Defence clothing team awarded the firm a contract valued at £1,194,447 for the supply of gloves. The firm does not have a website and we were unable to find any information relating to production locations.

Commitments to Ethical Standards: No information is available.

Modern Slavery Act Statement: A record for the company could not be found on the Companies House website. We are therefore unable to ascertain whether the firm falls within the scope of the reporting requirement.

B. Ministry of Justice Contractors

The research examined information and disclosures from six companies awarded contracts for the supply of clothing and footwear by the MoJ in 2013 and 2014. The total value of these contracts was just under £35.5 million, including one seven-year contract valued at £34,875,029 (Jiangsu Sunshine Dongsheng I/E Co.). The official webpage with information on MoJ procurement makes no reference to ethical standards.⁷⁶

1. Jiangsu Sunshine Dongsheng I/E Co

Company Overview and Production Locations: China-based Jiangsu Sunshine Dongsheng is a trading company dealing with import and export in the garments, outdoor products, light industrial products, mechanical, and electrical products industries.⁷⁷ One source indicates that the company has long-term relations with T-shirt factories in Jiangsu Province in China.⁷⁸ Beyond this, no information about their suppliers is available. In 2012, the MoJ awarded the company a seven-year contract valued at £34,875,029 for the supply of clothing and footwear. “Supply chain entities disclosure” was listed in the award criteria for this contract.

Commitments to Ethical Standards: The company does not mention any commitments to ethical standards on its website.⁷⁹ It merely states that its success strategy is based on the introduction and training of qualified personnel.⁸⁰ The company appears to be linked with Jiangsu Sunshine Group, but there are no details on the relationship between the two.

Modern Slavery Act Statement: A record for the company could not be found on the Companies House website. We are therefore unable to ascertain whether the firm falls within the scope of the reporting requirement.

2. Ballyclare Ltd

Company Overview and Production Locations: Ballyclare Ltd, an England-based firm, designs, manufactures, and supplies work clothing including industry-specific items.⁸¹ In 2014, the MoJ awarded the company a contract valued at £200,000 for the supply of protective and safety clothing. Ballyclare is part of Uniform Brands Limited, a leading workwear group.⁸² Ballyclare states that it manufactures its own clothing but that it uses “the best suppliers” for fabrics and technology.⁸³ One partner is W.L. Gore and Associates Limited (Gore), which creates technologically advanced workwear garments. In its modern slavery statement, Uniform Brands states that: “as a Group, we use a number of suppliers in a number of different regions and countries including Europe, Indonesia, Bangladesh, Dubai, Sri Lanka, Tunisia, India and China.”⁸⁴ Names and addresses of suppliers are not provided.

Commitments to Ethical Standards: The company is a member of the British Safety Industry Federation (which describes itself as the U.K.’s leading trade body within the safety industry) and states that it is committed to providing high quality fit-for-purpose-safety products and services.⁸⁵ The company is accredited with ISO 9001 and ISO 14001. The company has listed itself in the Utilities Vendor Data Base, a supplier management system run by private company Achilles, as well as the Rail Industry Supplier Qualification Scheme (RISQS), a supplier assurance scheme.⁸⁶

The firm’s named supplier, Gore, states that it is committed “to improve the communities in which [we] work and live.”⁸⁷ Gore lays out Standards of Ethical Conduct; Guidelines on Social Responsibility; produces an Environmental Responsibility Statement; and supports the Registration, Evaluation and Authorisation of Chemicals (EU REACH) Legislation. The company states, “we have an ongoing commitment to meeting all applicable health, safety and environmental regulations [...] and carefully consider the effects of our products on the environment as well as on the health and well-being of people.”⁸⁸ Gore also states that their agents, consultants, distributors, and other third parties that represent them must meet its Standards of Ethical Conduct as a contractual obligation.⁸⁹ Their guidelines on Social Responsibility address matters such as anti-corruption, freely chosen employment, child labour, freedom of association, fair wages, and waste management.⁹⁰

Modern Slavery Act Statement: Uniform Brands Limited has published a statement under the Modern Slavery Act covering the whole group, including Ballyclare.⁹¹ The statement says that the company operates in multiple countries, including the U.K., Spain, Germany, Holland, and Tunisia, and that it uses suppliers in a number of different regions and countries including Europe, Indonesia, Bangladesh, Dubai, Sri Lanka, Tunisia, India, and China. It reports that during the year covered by the statement, it identified a number of suppliers across the Group “as potentially failing to meet our high standards . . . Accordingly, alternative suppliers were sourced and have either been substituted for the offending supplier or are in the process of being substituted at the time of writing this statement.”⁹²

3. Bennett Safetywear

Company Overview and Production Locations: Bennett Safetywear, an England-based company, manufactures safety gloves and specialised protective clothing.⁹³ In 2014, the MoJ awarded the company a contract valued at £100,000 for the supply of protective and safety clothing. The company states it has long-standing European and Near East manufacturing partners but does not provide further details.⁹⁴

Commitments to Ethical Standards: The company has thirty-five employees based at its manufacturing site in Merseyside, which is certified with ISO 9001. The company also states that its products are manufactured and certified to the appropriate British and European and/or International standards.⁹⁵

Modern Slavery Act Statement: The company has small company accounts, suggesting that it falls below the threshold for the Modern Slavery Act supply chain reporting requirement.⁹⁶

4. Cooneen Protection

Company Overview and Production Locations: Cooneen Protection Ltd is part of the Cooneen Group (see page 21). In 2014, the MoJ awarded the company a contract valued at £100,000 for the supply of protective and safety clothing.

Commitments to Ethical Standards: The company states that its products meet NIJ, HOSDB, and ISO standards.⁹⁷ The company states that it operates a strict quality control system that is independently accredited to ISO 9001. Other commitments are made at group level.

Modern Slavery Act Statement: See page 21.

5. Goliath Footwear Ltd

Company Overview and Production Locations: Goliath Footwear, a West Yorkshire-based company, manufactures safety footwear for industrial markets.⁹⁸ The company is a wholly-owned U.K. subsidiary of Yakupoglu (YDS), a Turkish company.⁹⁹ In 2014, the MoJ awarded the company a contract valued at £80,000 for the supply of protective and safety clothing. The company has partnered with Gore (see page 24) and D3o.¹⁰⁰ Goliath Footwear's factory is based in Ankara, Turkey but there is no mention of other factories.¹⁰¹ A source states that YDS has two factories and that it works with approved subcontractors.¹⁰²

Commitments to Ethical Standards: Besides meeting the standards for Safety & Protective Footwear, Goliath Footwear states that it has a SATRA-accredited laboratory in its factory that is also accredited to ISO 9001, ISO 14001, and TS 18001:2008.¹⁰³ Its Parent Company, YDS, has the same certifications and commitments.¹⁰⁴

Modern Slavery Act Statement: The company has accounts for a small company, which indicate that it falls below the threshold for the Modern Slavery Act supply chain reporting requirement.¹⁰⁵ We were unable to ascertain YDS's turnover.

6. DMS Plastics

Company Overview and Production Locations: DMS Plastics is an England-based company that develops and manufactures a variety of plastic-based products.¹⁰⁶ In 2014, the MoJ awarded the company a contract valued at £60,000 for the supply of protective and safety clothing. The company lists the materials it uses but not the countries from which it sources.

Commitments to Ethical Standards: None found.

Modern Slavery Act Statement: The company has accounts for a small company, which indicate that it falls below the threshold for the Modern Slavery Act supply chain reporting requirement.¹⁰⁷

C. Transport for London Contractors

TfL is the local government organisation responsible for most aspects of London's public transport system. It operates under the control of the Greater London Authority and the Mayor of London. In comparison to the central Government departments featured in this report, TfL's procurement practice is significantly more socially responsible and advanced.

TfL is the only one of the four authorities considered in this report to have published its own Slavery and Human Trafficking Statement.¹⁰⁸ It also published its own policy paper on responsible procurement.¹⁰⁹ In June 2017, the Mayor of London published a Responsible Procurement Policy for the Greater London Authority and the functional bodies, including TfL. TfL is also affiliated to Electronics Watch and is the only public authority to have joined SEDEX. In 2016, TfL announced a five-year partnership deal with The Fairtrade Foundation to source cotton ethically for its staff uniforms.¹¹⁰ By contrast, neither the MoD nor the MoJ make any reference to responsible procurement on their procurement information webpages, nor have they published statements in accordance with the supply chain reporting requirement in the Modern Slavery Act.¹¹¹

Between 2013 and 2014, TfL awarded contracts for a total of £21,596,000 to workwear, safety gear, and textile accessories suppliers. All the suppliers are U.K.-based and most are SMEs.

1. Dimensions – MWUK

Company Overview and Production Locations: Dimensions is an England-based company, supplying clothing and protective equipment to corporate customers in the U.K.¹¹² Holding company Tailored Brands formed MWUK in 2014 when it acquired Dimensions, Alexandra, Yaffy, and other textiles providers.¹¹³ TfL awarded Dimensions-MWUK a contract for approximately £2,664,000 for the supply of footwear.¹¹⁴ In 2015, TfL awarded Dimensions another contract, also for footwear. The company lists the materials it uses but not the countries it sources from, nor the specific supplier names and addresses.

Commitments to Ethical Standards: The company states its commitment to providing manufacturing quality assurances and that it is “extremely conscious of the potential social impacts offshore supply can have.”¹¹⁵ The firm states that: “we regularly monitor and audit our supply partners through rigorous programmes,

and our senior team undertake regular site visits.”¹¹⁶ The company has a Corporate Social Responsibility (CSR) Policy Statement that outlines its obligations to care for the environment and recognises that “the health, safety and welfare of employees, visitors, contractors, external stakeholders and the wider community who may be affected by its operations is of primary importance in the successful conduct of its business.”¹¹⁷

The company is accredited with ISO 14001 and ISO 9001. The company also joined the SEDEX in 2008 and states that it monitors its supply chains and submits information through the SEDEX database.¹¹⁸ SEDEX describes itself as a “collaborative platform for sharing responsible sourcing data on supply chains.” The data is available only to SEDEX members. The company has been a member of the ETI since 2007 and has adopted the ETI Base Code.¹¹⁹

Modern Slavery Act Statement: MWUK has published a ten-page statement, setting out that it is a member of the ETI and is committed to embedding the ETI Base Code throughout its operations. The statement explains that the Group’s supply chain is managed from the firm’s U.K. Head Office in Derbyshire with support from a dedicated office located in Dhaka, Bangladesh, and that the main supply chains are predominantly located in South East Asia, supplemented by European and U.K. routes. The company does not own any of the businesses that supply products to MWUK Ltd, engaging entirely through third party manufacturers or agents. It has had relationships with most of its partner suppliers for over ten years. The statement explicitly recognises that risks of modern slavery are not unique to its offshore supply chain and states that it has adopted a robust risk-based approach that includes suppliers and labour providers regardless of location.¹²⁰

2. Cooneen Defence

Company Overview and Production Locations: Cooneen Defence Ltd is part of the Cooneen Group of companies (see page 21). In 2014, TfL awarded the firm a contract for £14,700,000 for the supply of outerwear, knitwear, fleeces, shirts, blouses, and tailored wear.¹²¹ In 2015, TfL awarded the firm another contract for the supply of uniforms. For a full overview, see page 21 above.

Commitments to Ethical Standards: For the company’s commitments to ethical standards and the Group’s commitments see page 21 above.

Modern Slavery Act Statement: For the company’s modern slavery statement information see page 21 above.

3. Berendsen (Formerly Sunlight)

Company Overview and Production Locations: Berendsen, an England-based company, provides service solutions to source, clean, and maintain textiles for

industry, commerce, and the NHS.¹²² In 2013, TfL awarded the company a contract valued at £3,232,000 for the supply of special workwear. In its Modern Slavery Statement, the firm reports that its main suppliers are located in Europe and that it also sources textiles from Pakistan, Cambodia, Vietnam, China, The Philippines, and Bangladesh. However, it does not provide specific names and addresses for its suppliers.¹²³

Commitments to Ethical Standards: The company states that it is committed to protecting the environment through its own actions and “by monitoring those of suppliers.”¹²⁴ The company has the Carbon Trust Standard and Carbon Trust Water Standard Certificate and has invested in energy-saving measures in recent years.¹²⁵ The company states that its U.K. workwear laundries achieved accreditation to ISO 9001 and that its healthcare sites are certified to, or working towards, the EN14065 (Standard on bio-contamination control). The company states that it has a Health & Safety Policy covering all aspects of risk assessment and control of substances hazardous to health, and that this is implemented in all Berendsen’s U.K. locations.¹²⁶

Modern Slavery Act Statement: Berendsen has a Modern Slavery statement on its website that briefly outlines the structure of the business and refers to its Ethics and Whistleblowing policies and to its Supplier Code of Conduct which requires its suppliers “to follow and share high standards of business practice and ethics.”¹²⁷ However, the links from the statement to these policies are broken. The statement addresses all the areas required by the Act but is very brief and worded in general terms.

4. Arco Limited

Company Overview and Production Locations: Arco Limited is an England-based company, which, together with its consultancy division Arco Training and Consultancy, offers health and safety services. In 2013, public transport provider the Go Ahead Group awarded the company a contract valued at £1,000,000 for the supply of work gloves. The company’s website sets out that it has a representative office in China (Arco Training & Consultancy) to ‘work directly with local manufacturers.’¹²⁸ It also has three trading subsidiaries in the U.K. (Arco Safety Ltd, Total Access (UK) Limited, Confined Spaces Training Services Ltd).¹²⁹ Arco also supplies companies, and works with distributors in Africa, Asia, Europe, the Middle East, and Australia.¹³⁰

In its response to the survey described in Section I, Arco outlined that its own label products are produced across 136 factories, with the majority located in China, Bangladesh, India, Taiwan, and Malaysia. All tier one factories are known and, in several instances, tier two factories and beyond have been mapped, but details are not available on the company website. Several tier two factories have been audited by independent global audit companies and a number visited by members of the firms ethical and buying teams. The company explained that it uses a five-step Product Assurance Process, which includes supplier evaluation and a requirement that

vendors and factories agree to the terms of the Arco Ethical Guide for Vendors, which is built around the ETI Base Code. The factory is then assessed and may be approved subject to certain commitments from the factory owners in relation to worker welfare. Most factory visits are announced, with unannounced visits conducted mainly by the company's ethical auditor based in China. All suppliers and factories must confirm the location that production will take place and factories are assessed, in most cases by an international audit company or an Arco Ethical Auditor. The factory must confirm the address of subcontractors employed for Arco production. Subcontracting is permitted on the condition that Arco assess the subcontractors before production is relocated.

Commitments to Ethical Standards: The company states that it has achieved the BitC Percent Standard, which recognises companies that financially support communities with at least one per cent of their tax profits.¹³¹ The company also states that they are a leading member in their sector of the ETI and conducts regular audits to ensure the ETI Base Code is being observed.¹³²

Arco has won several awards, including Company Clothing Industry Awards 2009 (environmental award), National Business Awards Finalist 2008 (corporate responsibility award), SHP IOSH 2009 (service excellence awards).¹³³ The company states that it audits its suppliers annually using a third-party specialist programme (Workplace Conditions Assessment), which is aligned with Global Social Compliance Program best practice guidance and addresses the ETI Base Code and the fundamental international labour standards defined by the ILO.¹³⁴ In this respect it also states its expectation that suppliers comply with its "Ethical Guide for Vendors."

In terms of environmental standards, the company states that it seeks to embrace new, high-efficiency technologies to reduce its carbon footprint. It also states that it has a contractual agreement to procure its energy requirements from renewable resources until 2019.¹³⁵ There is no reference to official certifications or ISO standards.

Modern Slavery Act Statement: The Group's two-page statement says that there are over thirty countries in its supply chain (but none are named) and over 100 own brand manufacturing facilities based in (unnamed) emerging markets.¹³⁶

D. Crown Commercial Service Contractors

We looked at disclosures from twelve companies awarded contracts by CCS in 2015 worth a total of £325 million¹³⁷ for the supply of occupational clothing. Individual contract amounts were not disclosed. Most companies are SMEs and fall under the threshold for the Modern Slavery Act supply chain reporting requirement. CCS is an executive agency, sponsored by the Cabinet Office, which brings together policy, advice, and direct buying, providing commercial services to the public sector.

1. 1st Biotech

Company Overview and Production Locations: 1st Biotech, an England-based company, manufactures and sells laboratory clothing. The company states that it does its own manufacturing and that all its fabrics are sourced and supplied from U.K. companies.¹³⁸

Commitments to Ethical Standards: The company's website does not mention any commitments to specific ethical standards.¹³⁹

Modern Slavery Act Statement: The company has accounts for a small company suggesting that it falls below the threshold for the Modern Slavery Act supply chain reporting requirement.¹⁴⁰

2. Arco

See page 28 above.

3. Burlington Uniforms

Company Overview and Production Locations: Burlington Uniforms, a London-based company, specialises in the supply of corporate uniforms for all industries and business sectors.¹⁴¹ The company states that it does its own manufacturing in South Wales.¹⁴²

Commitments to Ethical Standards: Burlington Uniforms is accredited with ISO 9001 and ISO 14001 standards.¹⁴³ It has policies on: the Quality of Product and Services; Equality and Diversity; Corporate Social Responsibility; Ethical Trading; Security and Confidentiality; its Environmental practices; and its Health and Safety Policy practices.¹⁴⁴ Their Ethical Trading Policy is based on the ETI Base Code and ILO standards, and refers to freely chosen employment, safe and hygienic working conditions, no enforced overtime, no discrimination, and no child labour.

Modern Slavery Act Statement: The company has accounts for a small company, suggesting that it falls below the threshold for the Modern Slavery Act supply chain reporting requirement.¹⁴⁵

4. Eurosafe Limited

Company Overview and Production Locations: Eurosafe Limited is an alliance of personal protective equipment (PPE) distributors around the U.K. The company lists its key suppliers (in this context, independent U.S. and European companies specialising in PPE) as: Answell (Australia-based); Bolle Safety; Centurion; Deb; Globus (U.K.-based); Honeywell, MSA (U.S.-based); ORN (U.K.-based); Polyco; Portwest; Ralawise; Eureka (Sweden-based); Scott Safety; 3M (U.K.-based); Uvex

(U.S.- and Germany -based); V12 Footwear (England-based); Alpha Solway (U.K.-based); Briggs; and DuPont.¹⁴⁶ Each of these companies has its own supply chain and production arrangements.

Commitments to Ethical Standards: Eurosafe Limited states that it believes in “conducting the affairs of its business in a manner which achieves sustainable growth at the same time demonstrating a high degree of social responsibility.”¹⁴⁷ The company states that it believes it must meet the expectations of customers, investors, suppliers, the community, and the environment. The company has the following policies: Equal Opportunities; Business Continuity and Disaster Recovery; Complaints; Corporate Social Responsibility; Ethical Trading; Health and Safety; Quality; and Anti-Bribery.¹⁴⁸

Modern Slavery Act Statement: The company has accounts for a small company, suggesting that it falls below the threshold for the Modern Slavery Act supply chain reporting requirement.¹⁴⁹ No statement could be found on the company’s website.

5. Future Garments Ltd

Company Overview and Production Locations: Future Garments, a West Midlands-based company, designs, manufactures, and sells workwear and supplies workwear, corporate wear, and personal protective equipment. The company states that it owns manufacturing facilities in Asia.¹⁵⁰

Commitments to Ethical Standards: The company is accredited with ISO 9001 and is working towards SA8000.¹⁵¹ The company also has a Corporate Social Responsibility Policy addressing the consumption of electricity, emissions, waste, and discharges to drains; an Environment Policy; a Health and Safety Policy for its employees; and it meets various European Standards for protective clothing.¹⁵²

Modern Slavery Act Statement: The turnover shown in the most recently available annual report and accounts suggests that the company falls below the threshold for the Modern Slavery Act supply chain reporting requirement.¹⁵³

6. Greenham Trading

Company Overview and Production Locations: Greenham Trading Limited is an England-based company and a subsidiary of Bunzl. The Bunzl site states that the company, which produces PPE, works with suppliers that are “typically international manufacturers of market leading brands.”¹⁵⁴

Commitments to Ethical Standards: Bunzl is accredited with ISO 9001 and the ISO 14001.¹⁵⁵ The company states it provides environmentally-friendly products through its “BeGreen” initiative, labelling products as recycled, renewable, biodegradable, or energy efficient.¹⁵⁶ Bunzl Group has a Corporate Social Responsibility Policy.

Modern Slavery Act Statement: In 2017, Bunzl had an annual revenue of £409.7m¹⁵⁷ and is therefore required to report under the Modern Slavery Act supply chain reporting requirement. In its statement, Bunzl asserts: “We do not manufacture any of the products we supply and our supply chain is both extensive, numbering thousands of suppliers, and dynamic as we respond to expanding customer requirements.” It goes on to say that the majority of its suppliers are based close to its selling companies, although it does import some products from lower cost areas, primarily south-east Asia, where it considers the potential risks of forced labour to be higher. It has identified India and Indonesia as countries with the highest potential direct risk whilst China, Mexico, and Turkey show elevated potential risk. Products with the highest potential risk were those made from rubber, plastics, textiles, pulp, and paper. It outlines policies in place and actions taken, including 449 supplier audits covering more than ninety per cent of spend in Asia.¹⁵⁸

7. Ioma Clothing Co.

Company Overview and Production Locations: Ioma Clothing Co. is a Northern Ireland-based company that provides uniform services. The company states that it provides outsourced uniform clothing services but does not provide any information on suppliers.¹⁵⁹

Commitments to Ethical Standards: The company has the following policies on its website: Business Continuity Plan, Disability Discrimination Policy, Environmental Policy, Equal Opportunities Policy, Ethical Trading Policy, Health and Safety Policy, Quality Policy, Equality and Diversity Policy, Recruitment and Selection Policy. It has an ISO 9001 certificate.¹⁶⁰ The company’s Ethical Trading Policy is based on the ETI Base Code and states that it is committed to “ensuring that the merchandise we source is obtained from manufacturers and suppliers who adhere to our principles of fair and honest trading.”¹⁶¹

Modern Slavery Act Statement: The company has accounts for a small company, suggesting that it falls below the threshold for the Modern Slavery Act supply chain reporting requirement.¹⁶²

8. James Boylan Safety (NI) Limited

Company Overview and Production Locations: James Boylan Safety (NI) Limited, a Northern Ireland-based company, supplies safety, uniform, and hygiene, and specialist products. It is part of JBS Group, an Ireland-based company.¹⁶³ The Group has multiple locations in the U.K. and Ireland and states that it has onsite design and production.¹⁶⁴

Commitments to Ethical Standards: JBS (NI) Limited does not have a website but the JBS Group states that it is ISO-accredited and committed to both environmentally-sound practices and ethical trading.¹⁶⁵ JBS Group is accredited with

OHSAS 18001:2007; ISO 9001; and ISO 14001.¹⁶⁶ JBS also has Ethics and Employment policies addressing ethical trade and labour standards, and which follows the ETI Base Code.¹⁶⁷ JBS Group states that it expects its suppliers to comply with the JBS Base Code, but that it recognises that some suppliers might be unable to meet all the terms within a short time and this will be taken into account.¹⁶⁸

Modern Slavery Act Statement: The statement briefly describes the procurement cycle and engagement with suppliers but provides no detail on the supply chain.¹⁶⁹

9. Romar Innovate

Company Overview and Production Locations: Romar Innovate, an England-based company, supplies a full range of PPE and workwear. The company is a JBS Group company (see above).¹⁷⁰ The company's website states that "Romar can provide all of the boxed bought in goods, but we can also provide bespoke, specially designed products, innovative solutions and technical support." However, under the heading "Manufacturers," the company simply provides a list of brands.¹⁷¹

Commitments to Ethical Standards: The company's website states that "Romar environmental targets and Romar environmental reduction targets for managing waste, water, energy and chemicals are available on request."¹⁷² The company also has an Ethics Policy and a Whistle Blowing Procedure.¹⁷³ However, these were both inaccessible due to faulty links. The firm implemented ISO 9001 in 1997. For information regarding the JBS Group, see above.

Modern Slavery Act Statement: See JBS Ltd. (above).¹⁷⁴

10. Tower Supplies

Company Overview and Production Locations: Tower Supplies, an England-based company, supplies PPE and corporate workwear.¹⁷⁵ The company's website does not mention its suppliers or sourcing countries but mentions that it works only with manufacturers that demonstrate "exemplary standards of care for the environment and their employees."¹⁷⁶

Commitments to Ethical Standards: The Company is accredited with ISO9001 and ISO14001.¹⁷⁷ The company also states that "all workers have a right to work in places where risks to their health and safety are properly controlled."¹⁷⁸

Modern Slavery Act Statement: The company has accounts for a small company suggesting that it falls below the threshold for the Modern Slavery Act supply chain reporting requirement.¹⁷⁹

11. DSTO Limited (Trading as Head 2 Toe Security)

Company Overview and Production Locations: Head 2 Toe Security is an England-based company. Head 2 Toe provides various PPE and workwear, body armour, security clothing, and footwear.¹⁸⁰ DSTO describes itself as a training provider.

Commitments to Ethical Standards: There are no references to ethical standards on the company's website.¹⁸¹

Modern Slavery Act Statement: The company has incomplete accounts, suggesting that Head 2 Toe Security is below the threshold for the Modern Slavery Act supply chain reporting requirement.¹⁸² DSTO Limited Trading has small company accounts, which also suggest it does not have to issue a statement.¹⁸³

12. Safeguy Protective Solutions

Company Overview and Production Locations: The URL provided in the Contract Award Notice¹⁸⁴ leads to a website that cannot be accessed without a username and password.

Commitments to Ethical Standards: No information is available.

Modern Slavery Act Statement: There is no record of the company on the Companies House website.¹⁸⁵

IV. FINDINGS AND CONCLUSIONS

A. Findings

1) Only ten of the thirty companies have published a Slavery and Human Trafficking statement: Arco, Beresden, Dimensions-MWUK, and Bunzl (Greenham Trading) have published their own statements. A further six companies have published their parent company's statement: Ballyclare (Uniform Brands); James Boylan Safety & Romar Innovate (JBS Group); Marlborough Communications (Cohort Plc); and Cooneen Defence and Cooneen Protection (Cooneen Group).

2) Fourteen of the thirty companies appear to be outside of the scope of the Modern Slavery Act reporting requirement: The fourteen companies appear to have annual turnover below £36 million, meaning they are not required to publish a statement. We were unable to ascertain the turnover of the remaining six companies.

3) Making publication of a Slavery and Human Trafficking statement a requirement for companies bidding for public contracts is of limited value in respect of SMEs: The government has set a target for 33% of procurement spend to reach SMEs by 2020, either directly or via another larger contractor through its supply chain. One element of the government's definition of an SME is turnover less or equal to £39 million. This suggests that a significant proportion of companies being awarded government contracts are likely to fall below the £36 million threshold for reporting under the Modern Slavery Act.

4) Companies disclose little detail on production locations: Eighteen of the identified contractors provide no detail on their websites about suppliers or sourcing countries, with the remainder providing general information only. Suppliers and production locations include: China, Turkey, Indonesia, Bangladesh, Dubai, Sri Lanka, Tunisia, India, Morocco, Ireland, Pakistan, Cambodia, Malaysia, Vietnam, Taiwan, The Philippines, Australia, the United States, the U.K. (with specific reference in one case to Wales), Sweden, and Germany. Fifteen companies make general references to their suppliers and manufacturers meeting their standards, but there is limited information provided on how companies ensure that standards are maintained in their supply chains and operations. None of the companies publish more specific information such as factory names and addresses.

5) Disclosures on ethical practices are limited to lists of standards and policies: Most of the companies featured in the report (twenty-one out of thirty) make some reference on their websites to corporate social responsibility, sustainability, and/or ethical standards, and all but seven mention some form of quality standard accreditation. The most frequently cited accreditations are the ISO 9001 and ISO

14001. Some companies refer to ethical trading policies, health and safety policies, corporate social responsibility policies, and equality or diversity Policies, but fifteen of the identified company policies are fairly general in nature. Of the thirty companies studied in this report, only one referred to conducting due diligence.

6) Government procurement guidance is contradictory and lacking practical

information: The EU Public Contracts Directives 2014 allow public buyers considerable scope to use the procurement process to advance the protection of human rights, but the government's guidance to public buyers on the social and environmental aspects of the new rules is confusing, contradictory, and does not provide useful practical information.

7) In comparison to the central government departments featured in this report, TfL's procurement practice is significantly more socially responsible and

advanced: TfL is the only one of the four authorities considered in this report to have published its own Slavery and Human Trafficking Statement. In June 2017, the Mayor of London published a Responsible Procurement Policy for the Greater London Authority and the functional bodies, including TfL. By contrast, neither the MoD nor the MoJ make any reference to responsible procurement on their procurement information webpages, nor have they published statements in accordance with the supply chain reporting requirement in the Modern Slavery Act.

B. Conclusions

The companies studied in the report were awarded significantly-sized contracts to supply apparel to public authorities, but in many instances information on their corporate structures and supply chains is not available on their website, and most had made few, if any, meaningful human rights or ethical commitments publicly. Of the thirty companies studied in this report, only one referred to conducting due diligence. Most of the companies studied publish only very general, or no, information on the sourcing of their products. Although it was clear from the limited information available that the companies do source from countries with weak labour protections and known business-related human rights violations, there was little evidence of the efforts made to ensure the production facilities they purchase from had sufficiently high labour standards.

One issue that exacerbated this problem was the reporting framework in the U.K. The reporting requirement under the Modern Slavery Act leaves companies free to include the information they think appropriate, but this often results in insufficiently detailed modern slavery statements. In addition to this, many of the companies featured in the report fall below the revenue threshold and are not required to report under the Act.

The UNGPs restate the obligation on States to protect against human rights abuse, including by business enterprises, and provide that States should promote respect

for human rights by business enterprises with which they conduct commercial transactions. Based on this sample of thirty companies, the U.K. government should be doing more to ensure its contractors are more transparent and are meeting their responsibility to respect human rights. The U.K. legal framework for public sector procurement is complex, but as the overview in this report demonstrates, there is significant scope for public authorities to improve the levels of transparency and responsibility in the companies from which they procure.

V. RECOMMENDATIONS

The U.K. government should:

- Revise “The Public Contracts Regulations 2015: Guidance On Social and Environmental Aspects” in consultation with civil society organisations, academics with expertise in socially responsible procurement, and procurement professionals. The revised Guidance should include practical examples for public buyers on protecting human rights and labour rights in their supply chains, with a particular focus on human rights due diligence. The revision should include information on:
 - » How to use contract conditions and contract management activities to monitor human rights compliance and impose new obligations on contractors to conduct human rights due diligence as required by the UNGPs, cooperating with the customer as necessary and appropriate, throughout the contract term;
 - » How to factor human rights considerations into the tender evaluation when they relate to the way in which the products and services are produced; and
 - » How to use the full range of mandatory and discretionary exclusion grounds, including violations of related international law and collective agreements.
- Create an online database with information about the human rights practices of suppliers.
- Invest in human rights training for public buyers.
- Implement the recommendations of the UN Working Group on Business and Human Rights’ report on opportunities for SMEs in the implementation of the UNGPs, particularly by:
 - » Providing dedicated support for SMEs in the implementation of the UNGPs; and
 - » Embedding the standards of the UNGPs into existing processes and platforms for supporting SMEs.
- Engage with industry bodies such as the Federation of Small Business to establish ways to meet the challenges of respecting human rights faced by SMEs.
- Require all central government departments and public bodies with a turnover of more than £36 million to publish an annual slavery human trafficking

statement to improve transparency about their supply chains, risks of labour rights abuses, and the steps they are taking to ensure adherence to international labour rights standards.

- Consider introducing a requirement for all entities bidding for public contracts over a certain value to publish a Slavery and Human Trafficking statement, irrespective of turnover
- Amend § 54 of the Modern Slavery Act to remove the option for entities to report that they have taken no steps to address slavery and human trafficking.

Businesses contracted by public buyers to supply goods and services should:

- Remember their status as recipients of public money and the responsibilities that entails. Public contractors should openly commit to and comply with human rights, social, and environmental standards, including the UNGPs and the OECD Guidelines for Multinational Enterprises. The UNGPs state that the Principles apply “to all business enterprises, both transnational and others, regardless of their size, sector, location, ownership and structure,” while SMEs are encouraged to follow the Guidelines “to the fullest extent possible.”¹⁸⁶
- Ensure compliance with their legal obligations under § 54 of the Modern Slavery Act to publish an annual Slavery and Human Trafficking statement in a prominent place on their website homepage. The statement must be approved by the board of directors (or equivalent management body) and signed by a director (or equivalent). This recommendation equally applies to those companies above the specified total turnover that are only covered by a statement published by their parent company. Government guidance clarifies that each company above the threshold must publish a statement.
- Follow government guidance on reporting under the Modern Slavery Act, which includes disclosing on all information prescribed under § 5.2 of the Guidance.
- Engage with their own suppliers throughout their supply chains, without simply passing on the responsibility to their primary suppliers to identify and mitigate human rights and labour abuses in their respective supply chains.
- Disclose details on their corporate structure and any subsidiaries, sites of production (including name and full address of manufacturing facilities), and supply chains, paying particular attention to known high-risk areas.

ANNEX 1

The table below provides detailed findings for each of the thirty companies.

Company name	Ethical standards & company policies	Modern Slavery Statement	Production locations disclosed
1st Biotech	No formal commitments.	Below the Modern Slavery Act reporting requirement threshold.	U.K. companies.
Arco	BitC; ETI member.	Two-page statement. Mentions that there are 30 countries in its supply chains but none are named. https://www.arco.co.uk/mdsstatement	Production of own label products is conducted across 136 factories, with the majority located in China, Bangladesh, India, Taiwan, and Malaysia Representative office in China. Suppliers in Africa, Asia, Europe, the Middle East, and Australia also mentioned.
Ballyclare Ltd.	ISO 9001; ISO 14001; Listed on the Utility Vendor Data Base; Supports EU REACH.	Covered by Uniform Brands Limited statement. http://www.uniformbrands.co.uk/wp-content/uploads/2017/06/Modern-Slavery-Act-2015-slavery-and-human-trafficking-statement.pdf	Suppliers in Europe, Indonesia, Bangladesh, Dubai, Sri Lanka, Tunisia, India, and China.
Bennett Safetywear	ISO 9001; British Standards; European Standards.	Below Modern Slavery Act reporting requirement threshold.	Manufacturing partners in Europe and the Near East.
Berendsen (formerly Sunlight)	Carbon Trust Standard certificate; Carbon Trust Water Standard Certificate's 9001; EN14065 (Standard on Bio Contamination Control); Health and Safety policy	Yes. http://www.berendsen.co.uk/documents/14285/0/	Main suppliers in Europe, sources textiles from Pakistan, Cambodia, Vietnam, China, The Philippines, and Bangladesh.
Burlington Uniforms	ISO9001; ISO14001; CCS Supplier. Policies on: Quality; E&D; CSR; Ethical Trading (based on ETI Base Code and ILO standards); Security and Confidentiality; Environment; Health and Safety Policy.	Below Modern Slavery Act reporting requirement threshold.	Manufacturing in South Wales.

Cooneen Defence	ISO 9001; SA 8000; Undertakes to respect international instruments such as the ILO Convention, UDHR, ICESCR, ICCPR, UNCRC, UN CEDAW, UN CERD	Cooneen Group has published a statement. https://cooneengroup.com/app/uploads/2018/01/Anti-Slavery-Statement.pdf	Europe, Asia, and the U.K.
Cooneen Protection	NIJ; HOSBD; ISO 9001; SA8000; Undertakes to respect international instruments such as the ILO Convention, UDHR, ICESCR, ICCPR, UNCRC, UN CEDAW, UN CERD.	See Coonen Defence.	None mentioned.
Dimensions – MWUK	CSR policy statement; ISO14001; ISO9001; SEDEX member; ETI member.	Yes. https://www.dimensions.co.uk/cdn/uploads/Modern-Slavery-Statement.pdf	Supply chains predominantly located in South East Asia, supplemented by European and U.K. routes.
DMS Plastics	None found.	Below Modern Slavery Act reporting requirement threshold.	The company lists materials it uses, but not the countries it sources from.
DSTO Limited Trading as Head 2 Toe Security	No commitments.	No.	None mentioned.
Eurosafe Limited	Policies on: Equal Opportunities; Business continuity and disaster recovery; Complaints; CSR; Ethical Trading; Health and Safety; Quality; Anti-bribery.	Below Modern Slavery Act reporting requirement threshold.	Australia, U.K., US, Sweden, Germany, and England.
Future Garments Ltd	ISO 9001; SA 8000. Policies on: CSR; environment; Health and Safety. Meets various European standards for safety clothing.	Below Modern Slavery Act reporting requirement threshold.	Partially mentioned: owns manufacturing companies in Asia.
Goliath footwear Ltd.	SATRA-accredited laboratory; ISO 9001; ISO 14001; TS18001:2008	Unable to ascertain YDS's revenue.	Factories in Ankara, Turkey.

(Bunzl) Greenham Trading	ISO 9001; ISO 14001.	Yes. http://www.bunzl.com/responsibility/strategy-and-governance/modern-slavery-statement.aspx	Bunzl site states that company's preferred suppliers are "typically international manufacturers of market leading brands."
Ioma Clothing Co.	ISO 9001; Business continuity plan; Policies on: Disability Discrimination; Environment; Equal Opportunities; Ethical Trading (based on ETI code); Health and Safety; Quality; E&D; Recruitment and Selection.	Below Modern Slavery Act reporting requirement threshold.	None mentioned.
Iturri	ISO 9001; PECAL 2110; ISO 14001; OHSAS 18001; SA800; ENAC-accredited; Undertakes to respect human rights as set in the ILO, UN, and national laws.	Below Modern Slavery Act reporting requirement threshold.	Clothing factories in Morocco and purchases from Asia.
James Boylan Safety	JBS group accredited with: OHSAS 18001:2007 ISO 9001; ISO 14001; has Ethics and Employment policies (following ETI Base Code).	JBS Group, the Ireland-domiciled parent company, has a statement. https://jbs.group/pdf/JBS_Modern_Slavery_Act_2015_&_Ethical_Procurement_Policy.pdf	Production sites in U.K. and Ireland.
Jiangsu Sunshine Dongsheng I/E Co	None mentioned.	No.	One source indicates that the company has relations with T-shirt factories in Jiangsu province in China.
Kashket & Partner	ISO 9001; SA 800; ISO 14001.	Below Modern Slavery Act reporting requirement threshold.	None; states that it uses "offshore suppliers when customers request us to do so and only if they conform to our high ethical, environmental and quality standards."
Marlborough	TRACE Certified	Marlborough Communications has revenue below the threshold, but its parent company has published a statement. https://www.marlboroughcomms.com/media/25629/Modern-Slavery-Statement-July-2016.pdf	The company states that it develops technology in-house or sources it from worldwide partners, but does not say who these are.

OK Hungarian Gloves	None; no website.	Unable to ascertain revenue.	None mentioned.
Police Resources International	ISO 9001; ISO 14001.	Below Modern Slavery Act reporting requirement threshold.	Website does not mention production locations.
Romar Innovate	Ethics policy; Whistleblowing procedure; Part of JBS group accredited with: OHSAS 18001:2007; ISO 9001; ISO 14001; Ethics and Employment policies (following ETI Base Code).	JBS Group, the Ireland-domiciled parent company, has a statement. https://jbs.group/pdf/JBS_Modern_Slavery_Act_2015_&_Ethical_Procurement_Policy.pdf	None mentioned.
Safeguy Protective Solutions	No information available	No records of the company on the Companies House website.	None mentioned. Website cannot be accessed without a username and password.
Tower supplies	Environmental policy; ISO 14001.	Below Modern Slavery Act reporting requirement threshold.	Company website does not mention suppliers or sourcing countries.
Turner Virr	ETI member; Environmental Policy; ISO 9001; ISO 14001.	Below Modern Slavery Act reporting requirement threshold.	None mentioned; uses “a combination of owned U.K. manufacturing sites and large overseas manufacturing partners.”
TW Kempton	None mentioned.	Below Modern Slavery Act reporting requirement threshold.	None mentioned.
Unifeq Europe	ISO 9001; AQAP 2110 (NATO quality Assurance); ISO 14001; PN-P-18001; OEKO-TEX; WRAP; SMETA	Unable to ascertain revenue.	Company states that it cooperates with blue chip forwarding companies, but does not mention production locations.
Wyedean Weaving Co.	ISO 9001; ISO 14001; Investors in People Certified.	Below Modern Slavery Act reporting requirement threshold.	The company states that it has “strong ties with numerous off-shore facilities, across multiple continents” but provides no further detail.

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- ¹⁵ Transposition refers to the domestic legislative process by which EU Directives are implemented in the UK.
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Every year, the U.K. public sector purchases a huge volume of apparel, such as uniforms for staff in prisons, hospitals, the emergency services, and the armed forces, and including protective clothing, footwear, socks, gloves, and bags – but is this apparel responsibly sourced?

Risks of severe labour, environmental, and human rights abuses in the apparel manufacturing sector have been extensively documented for the last forty years, but it is unclear whether government procurement practices take these risks seriously.

‘Who made our uniforms?’ examines the degree to which companies supplying public sector apparel disclose information about their supply chain, and analyses the current legal and policy framework to see what scope the government has for doing more.

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