



Hidden in plain sight

Confronting
modern slavery in
today's economy

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Foreword

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Modern slavery is hidden in plain sight. It exists not only in places far from view, but within the systems, products and services that shape everyday life. Across supply chains, workplaces and transport routes, exploitation is too often embedded in the global economy: in the clothes we wear, the food we buy, the technology we use and the services on which we depend. There are an estimated 50 million victims of modern slavery, of which 27 million adults and children are trapped in forced labour – affecting real lives, families and communities.

The UK is not insulated from this reality. Around £20 billion worth of goods imported into the UK each year are at risk of being produced with forced labour. That figure should challenge any assumption

that exploitation is remote from our markets or our responsibilities. It also underlines why action cannot be delayed. Where goods and services are produced through coercion, debt bondage, unsafe conditions or the denial of basic rights, responsible businesses are undercut, consumers are misled and vulnerable workers' pay the highest price.

The findings set out in this white paper are therefore timely and important. IOSH's research with UK businesses shows that, despite growing awareness, too many organisations still lack the basic systems needed to identify, assess and manage modern slavery risk. Many do not formally map their supply chains, train staff, provide safe routes for workers to raise concerns, or measure whether their interventions are working. This reveals a critical gap between recognition and implementation. Modern slavery may now be widely acknowledged, but it is not yet consistently built into the operational controls, governance arrangements and risk management systems that are needed to prevent harm.

This must change. Preventing exploitation requires more than statements of intent. It requires clear duties, effective due diligence, meaningful worker voice, robust enforcement and accountability

for the businesses that benefit from global value chains. That is why I have called for the Government to implement my *Forced Labour and Human Rights Legislative Framework*. This would require businesses to prevent serious human rights harms in their operations and supply chains, introduce consequences where they fail to take reasonable steps, and give the UK powers to stop goods made with forced labour from entering our market.

The Government now has an opportunity to deliver legislation that matches the scale of the challenge and aligns the UK with emerging international standards. Such reform would support victims and survivors, give responsible businesses the clarity and level playing field they need, and help ensure that economic growth is not built on exploitation.

This white paper makes an important contribution by showing how modern slavery prevention can be embedded into occupational safety and health practice and wider organisational governance. It reminds us that exploitation thrives where oversight is weak, workers lack voice and systems fail to protect them. The task before us is urgent but achievable: to build a world of work in which safety, dignity and freedom are not aspirations, but minimum standards for all.





Introduction

Modern slavery is not a relic of the past, nor is it confined to distant regions or less developed economies. It is an issue that exists within today's global economy, often concealed within otherwise legitimate labour markets and business activity.

Globally, around 50 million people are estimated to be living in modern slavery,¹ with a significant proportion of forced labour occurring in middle- and high-income countries. This challenges any perception that exploitation is a distant or imported issue. Instead, it is deeply embedded in the systems that underpin modern economies, from international supply chains to domestic labour markets. Modern slavery is therefore linked to the way work is organised, managed and delivered across borders and modern economies.

At the same time, the organisation of work is undergoing profound change. Globalisation, labour shortages, shifting migration patterns and the increasing use of complex, multi-tier supply chains are transforming how labour is sourced and managed. While these developments create opportunities for growth and innovation, they also introduce new risks and vulnerabilities.

Workers operating in fragmented or precarious arrangements, often mediated by third parties, may find themselves exposed to exploitative practices that are difficult to identify and detect and even harder to address.

Modern slavery encompasses forced labour, human trafficking, debt bondage and other forms of coercive exploitation in which individuals cannot

refuse or leave work freely. In many cases, these risks are not immediately visible. They can develop gradually within workplaces where safeguards and controls are weak, oversight is limited and workers lack the ability and safe channels to raise concerns. It is therefore rarely an isolated failure, but the outcome of systemic weaknesses in how work is planned, managed and governed.

For organisations, this creates a clear risk management and ethical challenge. Understanding where and how these risks arise is essential to preventing harm and protecting vulnerable workers.

Women, children, and migrant workers remain disproportionately affected, and those facing overlapping vulnerabilities – poverty, discrimination, displacement – are at even greater risk.²

What is modern slavery?

Modern slavery takes many forms and is known by many terms. Terminology varies across jurisdictions. Countries such as the United Kingdom and Australia use the term “modern slavery” in legislation, while others, including Canada, refer to “forced labour” and “child labour”. Despite these differences in language, the underlying risks and impacts are consistent.

Within the UK law, modern slavery encompasses offences of slavery, servitude, forced and compulsory labour and human trafficking. At its core, it refers to situations of exploitation that a person cannot refuse or leave because of threats, violence, coercion or deception.

For the purposes of this white paper, references to “modern slavery risks” should be understood broadly and in the context of work and work-related activities. They include risks of forced labour, human trafficking and child labour across operations, supply chains and business relationships. This approach reflects the reality that exploitation is often interconnected, with multiple forms occurring simultaneously or evolving over time.

The link to occupational safety and health

Over the past decade, awareness of modern slavery has increased significantly. Governments have introduced reporting legislation, businesses have published disclosures, and public scrutiny has intensified. However, these developments have not yet translated into a consistent and measurable reduction in exploitation. Evidence indicates that modern slavery is growing in scale and complexity, while policy, business and enforcement responses have not consistently kept pace.³

Addressing this gap requires a shift in how modern slavery is understood and managed. Modern slavery must not be viewed solely as a matter of criminal justice or corporate ethics. It should also be understood as a consequence of how work is designed, managed and controlled. Many of the risk factors associated with modern slavery, including unsafe working conditions, excessive hours, coercive recruitment practices and the lack of meaningful stakeholder engagement, are not separate from exploitation; they are also health and safety risks.

From this perspective, modern slavery is an occupational safety and health (OSH) issue. OSH systems are designed to prevent harm and protect workers through the identification of hazards and mitigation of risks and ultimately ensure safe and healthy working environments. When these systems fail – whether through poor design, weak implementation or lack of oversight – the conditions for exploitation may be exacerbated. When they are robust and inclusive, they can help identify early indicators of exploitation risk and support timely intervention.

The implication is clear: the risk of exploitation is reduced where work is safe, workers are protected and organisations are effectively governed and accountable.

Modern slavery in the UK

Modern slavery is rooted in structural conditions that create vulnerability.

Economic inequality, insecure migration pathways, weak labour protections and demand for low-cost labour all contribute to an environment in which exploitation can emerge. These drivers can be amplified by organisational practices such as subcontracting, outsourcing and reliance on temporary labour, which may obscure accountability and reduce visibility over working conditions.⁴

In the UK, legislative progress has been significant, but IOSH also believes it has been incomplete. The Modern Slavery Act 2015 raised awareness and established a foundation for transparency, but its limitations are now evident. Limitations in enforcement mechanisms, combined with variability in reporting quality, have impacted its overall effectiveness.

At the same time, many high-risk activities – as well as those involving smaller organisations

and further down the supply chain tiers – remain outside its scope, and can be more difficult to capture within reporting requirements. This creates a fragmented system in which responsibility is unevenly distributed, and risks are concentrated in areas with the least oversight.

Recorded cases continue to rise, and labour exploitation has become the prevalent form, particularly in sectors such as agriculture, construction, care, logistics and hospitality.⁵ In the global textile and garment industry, workers are disproportionately exposed to various occupational hazards and risks, including hazardous chemicals, mechanical risks, ergonomic risks, psychosocial risks, and physical risks, as well as exploitation. These are sectors that underpin the functioning of society, yet evidence indicates that some business models within these sectors can rely on vulnerable workers exposed to unsafe conditions, excessive working hours and limited protections.

Modern slavery in the UK

Anti-Slavery International says it is impossible to know the full extent of modern slavery in the UK. However, official figures at the end of 2025 show there were:

23,411 potential victims of modern slavery – the highest number of referrals since the records began in 2009.

30% of all of these were children – meaning there were 7,028 potential child victims.

22% of people referred were British nationals.

39% of potential victims claimed they were exploited exclusively in the UK.



While awareness among businesses has improved, many organisations are reported to treat modern slavery as a compliance exercise, producing statements with limited evidence of effective due diligence or measurable impact.⁶

This gap is reflected in wider research undertaken by the Business and Human Rights Resource Centre, which shows that a significant proportion of companies fail to meet even basic reporting requirements even when they are required to do so under the Act, with limited consequence for non-compliance being reporting in practice.⁷ As a result, the current framework has not generated the consistent level of accountability or operational change required to address exploitation across value chains.

At the same time, the wider policy environment has become more complex. Debate around modern slavery has increasingly intersected with migration policy, raising concerns that some policy approaches may unintentionally discourage individuals from reporting exploitation. This risks weakening identification systems and undermining efforts to provide protection and support.

Despite these challenges, the UK retains important institutional strengths. Its victim identification system remains one of the most developed globally, and multi-agency coordination has improved in recent years. The establishment of the Fair Work Agency represents a significant opportunity to strengthen labour market enforcement by improving coordination, increasing inspection capacity and enabling more proactive, risk-based approaches.⁸

The UK now faces a pivotal moment. Strengthening enforcement, aligning with emerging international due diligence standards and adopting a more prevention-focused approach will be critical to maintaining leadership and reducing exploitation. A modernised strategy – grounded in labour rights, safe migration pathways and robust corporate accountability – offers the clearest pathway to achieving this.

Examples of modern slavery

Modern slavery in the UK is most visible in sectors where work is low-paid, informal, subcontracted, or hidden from regulatory oversight.



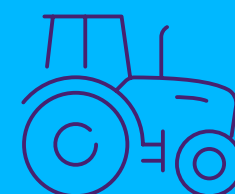
Hand car washes

One of the most documented hotspots. Common indicators of exploitation include long working hours, unsafe use of chemicals, inadequate protective equipment, withheld wages and restrictions on workers' freedom. Workers may also live in employer-controlled accommodation and have their documents taken.



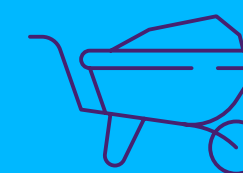
Nail salons

Frequently linked to trafficking networks. Indicators include debt bondage, excessive working hours, no contracts, and workers living on-site in cramped conditions.



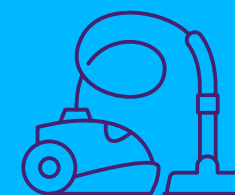
Agriculture and food processing

Seasonal and migrant workers are vulnerable to recruitment fees, tied visas, overcrowded housing, and wage theft.



Construction

Subcontracting chains create layers of opacity, meaning risks can arise within complex subcontracting chains, including being paid below minimum wage, forced to work excessive hours, with barriers to raising concerns or being threatened if they complain. Labour agencies and gangmasters are common intermediaries.



Hospitality and cleaning

Hotels, restaurants, and contract cleaning rely heavily on migrant labour. Indicators of exploitation include unpaid overtime, withheld documents/passports, and coercive control through debt or threats.



Social care

A rapidly emerging risk area. Overseas care workers on tied visas face recruitment debt, illegal deductions, and threats of dismissal or deportation if they leave abusive employers.

Time for action

The need for action is immediate

IOSH's research involving UK businesses indicates that many organisations lack fundamental systems for identifying and managing modern slavery risk. Many do not assess modern slavery risks formally and do not map their supply chains or provide structured training to staff. Channels for workers to inform modern slavery approaches are often absent, and few organisations measure whether their interventions deliver real outcomes and measurable improvements.

At the same time, a significant proportion of organisations express confidence in their ability to manage modern slavery risks. This disconnect between confidence and capability is a key challenge. It indicates that while modern slavery is widely acknowledged, it is also not consistently embedded into operational systems and controls, leaving significant gaps in prevention.

Addressing this gap requires coordinated action across multiple levels, beginning with governments.



Long hours | Forced overtime

**Heat
Exposure**

No worker protections

Governments and policymakers

Governments play a central role in setting expectations, creating incentives and ensuring accountability. Strengthening the legislative and regulatory framework is essential to improving the UK's response to modern slavery and supporting effective prevention.



IOSH supports the direction set out by the UK's Independent Anti-Slavery Commissioner's Forced Labour Legislative Framework, particularly the proposed shift toward mandatory due diligence, stronger enforcement and clearer accountability for business.

IOSH therefore calls for the implementation of this framework, which would:

- Create a duty on large businesses to prevent human rights harms in their global supply chains;
- Introduce penalties and civil liability for failing to prevent harms and providing organisations a defence if they have conducted human rights due diligence;
- Require companies to conduct mandatory human rights due diligence (this could be expanded to include environmental due diligence), requiring organisations to:
 - identify modern slavery risks across operations and supply chains
 - take steps to prevent and mitigate harm
 - provide remedy where harm occurs
- Prohibit forced labour products from the United Kingdom market (both import and export);

- Replacing section 54 of the Modern Slavery Act 2015 with provisions requiring reporting and disclosure on human rights;
- Create a regime that is grounded in the relevant international frameworks, interoperable with international regulations, and proportionate for SMEs;
- Replace today's fragmented rules with a clear, UK-wide framework that protects responsible businesses and promotes fair competition.

There is also a need to strengthen existing mechanisms and improve practice. IOSH therefore also recommends that governments and policymakers:

- Explore how **reporting requirements could be extended** to include organisations currently not in scope (for example by lowering the reporting threshold and including public sector bodies)
- Strengthen labour market enforcement by:
 - fully resourcing the Fair Work Agency
 - consolidating inspection and enforcement powers
 - enabling proactive, risk-based inspections and investigations
 - improving co-ordination across enforcement bodies.

- Protect migrant workers by:
 - prohibiting worker-paid recruitment fees and associated costs
 - regulating labour providers and intermediaries
 - ensuring safe and accessible reporting mechanisms.
- Develop and implement a **comprehensive national modern slavery strategy**, integrating:
 - prevention
 - enforcement
 - survivor support
 - international cooperation.
- Improve data sharing, intelligence and coordination across enforcement bodies, including police, labour inspectorates and local authorities
- Provide targeted support for SMEs, including:
 - provision of practical tools for risk assessment
 - training, awareness and capacity-building programmes
 - accessible guidance on due diligence.
- Align UK policy with emerging international frameworks to maintain global leadership.



Businesses

Organisations must move beyond compliance-driven approaches and embed modern slavery prevention into core operational systems.

Integrate modern slavery due diligence and risk management into **business risk management frameworks** and processes, with clear accountability at board level.

Conduct **risk-based due diligence** that:

- extends beyond first-tier suppliers
- prioritises high-risk sectors and geographies
- includes both direct and indirect labour.

Implement **responsible recruitment practices**, including:

- transparent, accessible employment contracts
- active oversight of labour intermediaries.

Establish **safe and accessible means for workers to raise concerns**, ensuring:

- confidentiality
- protection from retaliation
- accessibility in multiple languages.

Embed modern slavery risk management and due diligence across key business functions, including:

- OSH
- HR

- procurement
- sustainability and compliance functions.

Provide **mandatory training** for staff to ensure modern slavery and exploitation awareness. Ensure staff – both managers and employees – can identify and respond to indicators of exploitation.

Develop **clear escalation and remediation processes**, ensuring that:

- issues are addressed promptly
- workers are supported
- lessons are incorporated into systems.

Measure the effectiveness of modern slavery due diligence and risk management through:

- outcome-based indicators
- regular evaluation of controls
- continuous improvement processes.

Undertake supply chain mapping beyond tier one and throughout. Actively collaborate with suppliers to prevent and address modern slavery risks, and to improve standards, rather than relying solely on audits.



OSH professionals

OSH professionals are uniquely positioned to identify and prevent exploitation due to their direct engagement with working environments, conditions and workers themselves. Their role should be strengthened through the following.

Embedding modern slavery indicators into routine OSH activities, including:

- risk assessments
- audits
- inspections
- incident investigation and reporting
- performance measures.

Identifying and acting on indicators of elevated exploitation risk, such as:

- excessive working hours
- unsafe working environments
- lack of PPE or training
- restricted movement
- inadequate or unsafe accommodation.

Promoting meaningful stakeholder engagement by:

- supporting reporting mechanisms
- encouraging worker participation in OSH and worker consultation processes
- building trust through engagement.

Collaborating with other functions to ensure a coordinated organisational response, including worker representatives, human resources, etc.

Implementing training and guidance to increase awareness of exploitation risks and appropriate escalation routes/action.

Supporting prevention-oriented approaches that address underlying risk factors, such as poor working conditions and ineffective oversight.



Evidence of the challenge

IOSH research provides a clear picture of current organisational practice, highlighting significant gaps that will limit organisations’ ability to identify and prevent modern slavery.

In the UK, a large majority of organisations fall below the reporting threshold (turnover of £36m) and therefore operate without formal obligations to assess or disclose risks. Many lack formal commitments, structured processes or ongoing actions to address modern slavery risks.

Of particular concern is a substantial proportion of organisations lack channels for workers to raise concerns safely. Similarly, training and awareness are often absent, meaning staff are not equipped to recognise and respond to indicators of exploitation. In addition, many organisations do not measure the effectiveness of their interventions, limiting their ability to identify gaps and improve performance.

Perhaps most striking is the contrast between organisational capability and confidence. While these gaps persist, more than half of organisations report being confident in their ability to manage modern slavery risks. This indicates that the challenge is not solely one of awareness, but of implementation and systemisation.

Our survey findings

72% have a turnover below £36m and therefore do not produce a modern slavery statement (as they are not required to by UK law).

62% do not have a formal commitment to addressing modern slavery and have no plans to develop one.

70% have no formal assessment or mapping process for modern slavery.

56% are confident in their organisation’s ability to identify and manage modern slavery risks in their supply chain.

44% have no dedicated mechanism for workers to raise concerns about modern slavery.

62% have no ongoing actions to address modern slavery.

62% provide no formal training on identifying and responding to modern slavery risks.

48% do not have a defined process for responding to modern slavery.

56% do not measure whether their actions to prevent modern slavery are effective.

15% said governments should focus on training and awareness programmes for businesses and workers, with 14% indicating access to practical tools and guidance to identify risks would be valuable.

*The survey was conducted by YouGov on behalf of IOSH. In all, 1,011 people at senior management level in the UK responded.

International approaches: a shift towards due diligence

Across jurisdictions, there is a clear shift from transparency-based models toward frameworks that require organisations to actively identify, prevent and address modern slavery risks. While approaches vary, the direction of travel is consistent: effective prevention depends on integrating risk assessment, accountability and enforcement into corporate practice.⁹

France – Duty of Vigilance Law (2017)

France’s Duty of Vigilance Law is widely cited as an influential and effective legislative framework for preventing modern slavery and labour exploitation. It requires large French companies to develop, publish, and implement a vigilance plan covering human rights, forced labour, child labour, environmental risks, and worker safety across their global operations and supply chains.

The law has contributed to stronger corporate due diligence in some sectors, particularly in high-risk sectors such as agriculture, construction, mining, and apparel. Companies must map risks, consult stakeholders, monitor suppliers, and report publicly on their actions. Civil society organisations have used the law to bring cases against companies that fail to meet their obligations, creating a powerful accountability mechanism.

Independent assessments show that the Duty of Vigilance has led to improved disclosure, more systematic risk assessments, and greater integration of human-rights due diligence into corporate governance. It has also influenced legislative developments across Europe, including the EU Corporate Sustainability Due Diligence Directive.

Despite its strong design, enforcement remains inconsistent and many companies still treat vigilance plans as compliance documents rather than meaningful due-diligence tools.



Australia – Modern Slavery Act (2018)

Australia’s Modern Slavery Act (2018) is a transparency-based framework and has been recognised as a proactive legislative model for addressing modern slavery risks in business operations and supply chains. The Act requires large companies operating in Australia to publish annual modern slavery statements outlining how they identify, assess, and address risks of forced labour, child labour, human trafficking, and related exploitation.

A key strength of the Australian model is its centralised public registry, which provides open access to all company statements. This has increased transparency and enabled civil society, investors, unions, and consumers to scrutinise corporate performance. The registry has also encouraged a “race to the top,” with many companies improving their reporting quality to meet stakeholder expectations.

Evidence from reviews suggests that it has contributed to greater corporate awareness, more systematic risk-mapping, and increased engagement with suppliers in high-risk sectors such as agriculture, construction, cleaning, and international student labour. Many companies have strengthened their due-diligence processes, introduced responsible-recruitment policies, and expanded worker-voice mechanisms as a result of the reporting requirements.

However, the 2023 statutory review also identified areas for improvement, including the need for stronger enforcement mechanisms, clearer minimum reporting standards, and potential penalties for non-compliance. These proposed reforms aim to shift the Act from a transparency-only model toward a more robust due-diligence framework.

From policy commitments to practical action



OSH red flags and indicators that signal modern slavery

Modern slavery can be difficult to detect but can exist across business operations and supply chains. Organisations and professionals play a key role in preventing it by addressing both direct and indirect risks, including their purchasing practices, outsourcing, and recruitment processes. Many are already promoting ethical practices to protect workers from exploitation.

The following checklist is designed to help identify indicators of issues like forced labour, trafficking, debt bondage, and child labour. While a single indicator does not confirm exploitation, multiple signs should prompt further investigation and escalation.

It also highlights less obvious risks, such as unrealistic cost pressures, use of unvetted labour providers, exploitative supply chains, or unknowingly employing victims. The checklist should be used alongside regular safety OSH practices –

through inspections, worker interviews, and monitoring – to identify concerns early. If several warning signs are present, especially involving coercion or restricted freedom, the situation should be treated as high risk and reported to relevant authorities or support services.

A recurring challenge in tackling modern slavery is the gap between commitments and implementation.

Organisations may adopt policies or publish statements but, without operational integration, these actions have limited impact. Compliance becomes a procedural exercise rather than a driver of change.

Globally, this is beginning to shift. Emerging frameworks emphasise due diligence, requiring organisations to actively identify and manage risks rather than simply disclose them. These approaches focus on prevention, accountability and measurable outcomes, reflecting a growing recognition that transparency alone cannot deliver systemic change.



OSH checklist

Lack of freedom to refuse unsafe work

- Workers show fear or hesitation when asked whether they can stop unsafe tasks.
- Workers report being punished, threatened, or dismissed for refusing dangerous work.
- Workers continue hazardous tasks despite visible injury or exhaustion.

Absence of proper PPE or OSH training

- Workers lack basic PPE (gloves, helmets, masks, harnesses) even in high-risk environments.
- PPE is withheld, locked away, or only provided to certain workers.
- Training, information, instruction and awareness is not provided in a language workers understand, or workers say they were never trained.

Extreme fatigue and excessive working hours

- Workers show signs of exhaustion, microsleep, or physical collapse.
- Workers report excessive overtime, double shifts, night shifts, or seven-day work weeks.
- Workers appear to be living on-site or unable to leave the workplace.

High injury rates among a specific worker group

- Disproportionate injuries among migrant workers, agency workers, or one nationality.

- Repeated injuries linked to the same supervisor, task, or production line.
- Workers hide injuries or avoid reporting them due to fear of retaliation.

Restricted access to medical care

- Workers are denied medical treatment or told not to seek external care.
- Injuries are treated informally on-site to avoid documentation.
- Workers report being charged for medical care or threatened with dismissal if injured

Employer, managers or work colleagues excessive control over movement and breaks

- Workers are not allowed to leave the site freely during breaks or after shifts.
- Supervisors monitor or escort workers to toilets, canteens, or dormitories.
- Workers appear anxious about being away from their workstation.

Unsafe or employer-controlled accommodation

- Workers live in overcrowded, locked, or restricted dormitories.
- Accommodation is directly tied to employment, with threats of eviction for complaints.
- Fire safety, sanitation, and ventilation are visibly inadequate.

Irregular or missing OSH documentation

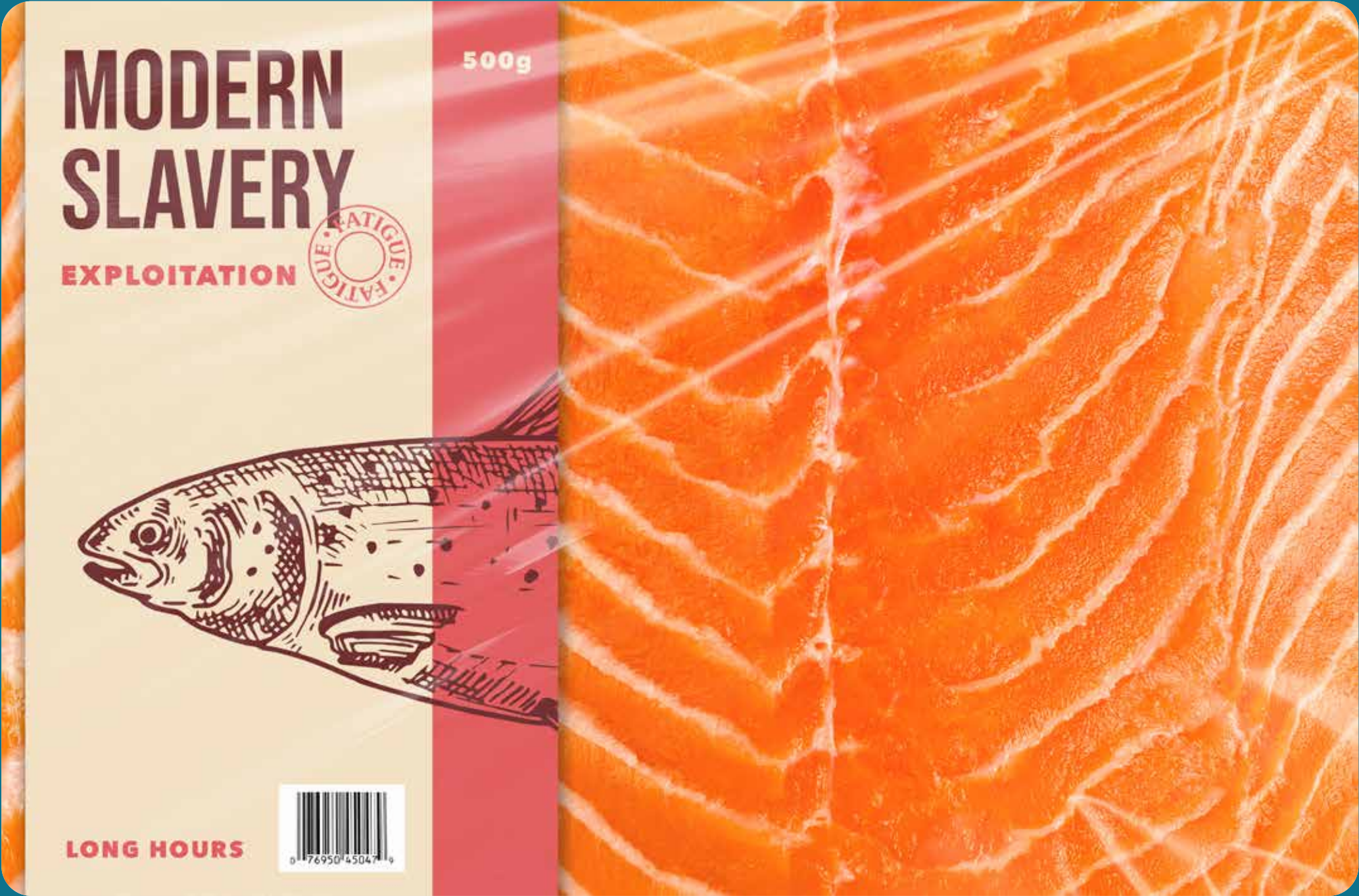
- No injury logs, training records, or risk assessments for high-risk tasks.
- Workers not listed on official rosters or payroll despite being on-site.
- Subcontractors unable to produce worker lists or OSH compliance documents.

Visible signs of coercion, fear, violence and harassment

- Workers appear intimidated, avoid speaking, or look to supervisors before answering.
- Workers show signs of physical abuse, untreated injuries, or chronic stress.
- Workers express fear of losing wages, documents, or housing if they raise OSH concerns.

No worker representation or voice mechanisms

- Workers say they cannot raise OSH concerns safely.
- No functioning safety committee, worker consultation routes, or migrant workers excluded from it.
- Workers report being coached on what to say during inspections.





Case study

Tackling modern slavery in healthcare supply chains

Modern slavery risks often remain hidden deep within global supply chains, making them difficult to detect and even harder to address.

Additionally, the lack of safe, accessible and effective grievance mechanisms makes it difficult for those experiencing modern slavery to pursue remedy. Because of the unique challenge this issue presents, organisations are increasingly recognising the need to move beyond compliance-based approaches toward proactive, systemic action.

One such example is a collaborative initiative involving NHS Commercial Solutions, Newcastle University, Brighton and Sussex Medical School, the Greater London Authority Group and Electronics Watch, a not-for-profit organisation that which promotes and protects the rights of workers in global supply chains, to build the capacity of public sector buyers and their suppliers to tackle modern slavery.

Building on UKRI-funded research into modern slavery risks in healthcare supply chains, the

partnership identified a critical gap: while risk assessment tools exist, many public sector buyers and their suppliers lack the practical capability to effectively prevent and address modern slavery. In response, the collaboration has developed an IOSH-accredited e-learning programme for suppliers engaged in public sector contracts.

The pilot phase of the project, comprising one four-module unit, was launched in May 2026. It equips participants with tools to identify, prevent, and address modern slavery and related human rights violations in public sector supply chains. The focus on how to undertake this work within the context of public procurement and the respective roles of public purchasers and suppliers in the process sets this training apart from others. The course content takes a practical, systems-based approach.

The first unit introduces modern slavery risks and links them with occupational health and safety, reinforcing the interconnected nature of these challenges. The second unit examines methodologies such as audits, certifications, and worker-driven approaches, highlighting both

their value and limitations, along with building skills around risk identification. Unit three focuses on how to assess their leverage, resources, and responsibilities within the supply chain. The final unit addresses implementation, with an emphasis on promoting meaningful stakeholder engagement, collaboration, remedy, and transparent reporting.

Throughout the programme, themes of resilience, agility, and cultural change are embedded, recognising that effective action requires shifts in organisational behaviour as well as systems. The co-created design, which draws on academic research, NGO expertise, and public sector leadership, ensures both credibility and practical relevance.

This initiative illustrates how organisations can prioritise tackling modern slavery by embedding expectations into procurement frameworks and investing in supplier capability. By shifting from compliance toward continuous improvement and accountability, it has the potential to drive meaningful, long-term change across public sector supply chains.

Conclusion

Modern slavery remains a complex and evolving challenge, but it is not inevitable.

The persistence of exploitation is often associated with systemic gaps in how work is planned, managed, organised, governed and monitored. Addressing it requires a shift from reactive responses to proactive prevention.

This white paper has set out a clear case for integrating modern slavery due diligence and risk management into OSH systems, recognising that many of the conditions that enable exploitation are closely linked to recognised OSH risks. A multi-faceted approach is required, one which includes supply chain mapping, due diligence, risk management and capacity building, if we are to tackle these insidious crimes. By strengthening these systems, organisations can improve their ability to identify risks earlier, enhance controls, and take action to protect workers and prevent harm before it occurs.

The path forward requires coordinated effort. Governments must strengthen frameworks and enforcement. Businesses must embed prevention-first approaches, accountability and responsibility into operations. OSH professionals must play a central role in identifying and mitigating risk and working with other specialists to ensure worker rights and protections.

Ultimately, modern slavery cannot be separated from the way work is designed. Where work is unsafe or unhealthy, where workers lack voice and where oversight is weak, exploitation is more likely to occur. Where systems are strong, inclusive and accountable, the risk of exploitation can be reduced.

The goal is clear: a world of work that is safe, healthy, decent and free from exploitation.



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About IOSH

The Institution of Occupational Safety and Health (IOSH) is the world's largest professional body for safety and health, and the only one with Chartered status.

We've been around since 1945, and today we're a registered charity with international NGO status. That means we're in a unique position to lead the way: shaping policy, championing positive change, and standing up for everyone's right to a safe and healthy workplace.

With a global community of 50,000 members, spread across 130 countries, together, we share one vision: a world where work is safe and healthy for all.

Through the work of our members, and our qualifications and training, we provide the skills, knowledge, and expertise needed to keep people and workplaces safe – and businesses and economies thriving.

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IOSH's human cost campaign shines a spotlight on how workers in complex global supply chains often face unsafe conditions and preventable harm.

