

# **Modern Slavery Act Section 54 Anti-Slavery Day 2019 Update: TISCreport publishes Companies in Compliance List**

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TISCreport.org (Transparency In Supply Chains Report) has today published a list of 1013 companies with modern slavery statements that comply with all of the criteria tested through its AI audit, based on the criteria in Section 54 of the Modern Slavery Act and the clarifications in the Home Office statutory guidance.

In July this year the TISCreport AI found that only 8.7% of companies required by law to comply with Section 54 of the UK Modern Slavery Act [1] met minimum technical compliance criteria being measured. In order to raise the bar this Anti-Slavery Day TISCreport has made the decision to publish those companies whose statements can help others in their sector improve their own.

<https://tiscreport.org/tiscreport-uk-modern-slavery-act-companies-compliance-list-2019>

Many companies are aware that the Home Office is conducting its own audit of statement compliance. It is hoped that by looking at the Companies in Compliance List, companies that are unsure of the minimum compliance criteria will be able to see where they need to focus, learning from other companies in their sectors.

Using AI for auditing statements means that the basic criteria can be identified without requiring human resources. This helps humans doing manual due diligence to identify the suppliers that need more support in meeting the compliance criteria without having to spend time assessing every statement. This doesn't remove the need for human expertise. It enables more focus on assessing quality rather than just tick box compliance; the perfect human-machine partnership.

CEO Jaya Chakrabarti MBE says: "Of course, meeting technical compliance criteria doesn't necessarily mean that a company has made any impact. A company with a completely non-compliant statement might actually be far more effective in tackling modern slavery than a company that has met the technical requirements. Good compliance must lead to effective action."

As a corporate transparency community, members of TISCreport recognise the need for going beyond basic compliance. One such member is J Coffey Construction Ltd. Adrian Clamp, their Sustainability and Systems Director, says "As one of London's leading construction companies in our sector, we recognise the importance of employing a workforce that has been fully vetted to the necessary right to work requirements, in compliance with the Section 54 Modern Day Slavery Act. We recognise that Master Crime gangs are on the rise and taking advantage of the financially vulnerable. To counteract this, we have implemented a PpAC software/scanner system that checks passports for Optical, Infrared & Ultraviolet recognition. We are SEDEX B Members and have invited some of our key supply chain members to join us, further demonstrating our supply chain transparency."

According to Data Strategy Chair Dr James Allan, "our AI-generated list is in no way ranking or tiering, and is only measuring against technical compliance points. However, the fact is that the focus is all too often on tick boxes. We hope that technology can be used here to provide a valuable resource

to companies that can meaningfully improve their due diligence process."

On system accuracy Stuart Gallemore, CTO of TISCreport, reports "Our algorithm is now running at 98.8% accuracy on located statements, and we're working on ensuring that the 1.2% uncertainty is diagnosed as accurately as possible."

On the other side, the perceived low bar for compliance with Section 54 has been causing much frustration for the wider anti-slavery community. Professor Andrew Crane from the University of Bath, a member of the TISCreport Data Strategy Board, says, "There is broad consensus among most experts that the current requirements under Section 54 are an absolute minimum and that a more prescriptive approach around mandatory content is called for. This was the conclusion of even the UK Government's own independent review. However, with so many companies not even able to meet the current low requirements, a shift to greater stringency will require a major step change in business attention."

With the list being publicly available, there is bound to be great interest in whether the most recognisable brands have passed the technical criteria tested by the TISCreport AI.

Andrew Wallis OBE, CEO of Anti-Slavery charity Unseen comments: "It is staggering that such a small number of companies have complied with the law of the land when it comes to disclosing the measures they are taking to tackle modern slavery in their supply chains and business practices. The law was designed to encourage businesses to begin to proactively engage with the issues, level the playing field so that all businesses would respond, encourage innovation in their responses to the issue and disclose what they were doing to tackle forced labour exploitation. Yet the response by businesses to the law means there is now a real chance that a more compliance based, tick boxed response will be argued for and will deliver a retrograde step. What TISCreport have done through this analysis and use of AI is highlight the state of play and I would urgently encourage the business community to urgently change tack and respond to both the letter and spirit of the law and work collaboratively to end modern slavery."

What does TISCreport say to companies who were expecting to be featured on their list but are missing?

Jaya advises: "The TISCreport Companies In Compliance List is based on the most comprehensive assessment of companies in scope of Section 54 to date. As such, the system has already contacted every company flagged as being potentially non-compliant based on data held in TISCreport, where email addresses are available. If companies are missing from our list and have checked that their information on their tiscreport profiles are correct on the system, it's worth them checking the Home Office Guidance Notes again thoroughly and updating their statement accordingly. Or by joining TISCreport, our AI will provide feedback for all MSA statements through company accounts. Either way, we hope to make technical compliance headaches disappear using technology, so that companies can start to focus on the actions that really matter. If we're going to save lives with Section 54, we all need to think outside the tick box."