

Co-op Modern Slavery Statement 2020

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Highlights in 2020

- Published details of our Tier 1 supply chain, including disaggregated worker data, as part of our commitment to transparency ([page 4](#))
- Became a founding member of the Modern Slavery Intelligence Network and joined Unseen's Helpline Business Portal to improve our ability to identify issues and support victims ([page 14](#))
- Responded to the challenges of Covid-19 and increased risk to workers, by launching a Global Wellbeing Charter ([page 14](#)) and delivering supplier webinars and guidance ([page 12](#))
- Supported two long-term FCDO projects to address issues being experienced by the most vulnerable workers in our supply chain and build resilience in East Africa ([page 14](#))
- Found new ways to hear directly from workers about working conditions, through Direct Worker Reporting, worker surveys and virtual site assessments ([pages 7 & 8](#))
- Supported our Food, Funeralcare and GNFR suppliers to complete the new Sedex SAQ - providing us with more information on workers and helping us drive change

And

- Reached a milestone in our campaigning for better victim support, with our Bright Future programme becoming an independent co-operative in 2020 ([page 16](#))

Introduction

In 2020, we saw lives across the world turned upside down by the Covid-19 pandemic. Along the way we've discovered much about our society, some of it wonderful and inspiring, but some of it quite ugly. Covid-19 has amplified the unfairness and inequalities that exist in our society and around the world. And how there are always people seeking to profit from the misfortune of others, by abusing their human rights and exploiting their labour.

When we adopted our new vision statement in 2020 - 'Co-operating for a fairer world' - we had no idea how quickly that commitment would be put to the test. Covid-19 presented us with a unique set of business challenges and community needs. What's happened has shown us the strength of a well-run and well-focused, co-operative business that's vision-led, and people-focused.

In the first wave of the pandemic, we gave more than £12m to charity and community causes in the UK and abroad, including for our Global Wellbeing Charter to support our producers in the developing world tackle the impact of coronavirus on their livelihoods.

Our Co-op in 2020

4.35 million members

2,600 food stores

840 funeral homes

63,324 people employed across the Co-op Group

We also responded to the increased and changing nature of worker exploitation, including modern slavery - finding new ways to identify and manage those risks, support suppliers to do the same, and to hear directly from workers. We will never be complacent, and will continue in our determination to protect and respect the rights of the people who work tirelessly to provide us with the products and services we all rely on.

Co-operation has always been at the heart of our approach. In 2020 we became a founder member of the Modern Slavery Intelligence Network, as well as bringing together a coalition of partners to provide free webinars for suppliers across 57 countries. And we continued to support victims of modern slavery back into paid work, through our Bright Future programme, which in 2020, became an independent co-operative.

If the pandemic has taught us anything, it's that co-operation and putting people and communities first works. That's why our focus and commitment to tackle modern slavery remains unwavering.



Steve Murrells
Co-op CEO

This Statement was approved
by the Board of the Co-op¹



About the Co-op

The Co-op Group is the UK's largest consumer co-operative, with 4.6 million active members and a presence in every postal district in the country.

We're a major food retailer and wholesaler, the largest funerals provider in the UK, a major provider of wills and probate services, and a major provider of life planning and insurance products. In 2020 we announced plans to grow our business-to-business Co-op Power operation. At the end of 2020, we completed the sale of our insurance underwriting business, enabling us to now deliver upon ambitious expansion plans. Our businesses are all UK-based and our main support centre is in Manchester.

We've undertaken extensive investment and modernisation of our business over the past few years, creating a business that is operationally strong, commercially successful and one that creates value for our members and their communities. That work has enabled us to respond to the immediate demands of the pandemic and plan our long-term response to its social and economic consequences.

You can read more about our business, including how we've been responding to the Covid-19 pandemic, in our [2020 Annual Report](#).

Our supply chains

We buy products and services from thousands of suppliers across the globe. Some are for re-sale and others we use in our own business.

Co-op Food own-brand products. Just under half (45% by turnover) of the goods we sell in our food stores are own-brand products, across a variety of categories.² Our supply chain is complex and varied, including farms, abattoirs, fishing vessels, processing factories, finishing, canning, packing facilities and assembly units. Our Food ethical trade monitoring programme³ now covers 2,480 sites (769 Tier 1 and 1,711 beyond Tier 1⁴) and over half a million workers across 6 continents and 72 countries - [see map](#).

As part of our commitment to supply chain transparency, we have shared [details](#) of our Co-op Food own-brand Tier 1 factories, along with data on the workers in those factories, including gender. We are continuing to map our supply chains beyond Tier 1 in high-risk categories.

Other own-brand and third-party products and services we sell. We also sell a wide range of third-party branded products and services in Co-op Food, Co-op Funeralcare, Co-op Insurance and other parts of our business. For example:

- **Co-op Funeralcare** sells coffins and caskets, headstones, memorial stones and flowers, some of which are Co-op brand products. We have around 32 key suppliers across these categories. We also offer wider services (eg through suppliers of specialist vehicles). Funeralcare products are sourced from a variety of countries.

Our Co-op brand coffins are manufactured in the UK, as are the majority of those from third party suppliers. Our masonry comes mainly from India and China; 98% of the coffins we manufacture are FSC certified.

- **Co-op Legal Services** provides inheritance planning, probate, personal injury, employment and family law services in England and Wales. All colleagues and direct service providers are based in the UK.
- **Co-op Insurance** sells car, home, travel, business and pet insurance policies. In February we launched our new life insurance cover for those over 50, the latest in our growing portfolio of insurance products.
- **Co-op Health** provides online ordering of repeat prescriptions which can be delivered direct to the customer's home or to their local Co-op. The business is built entirely on a digital platform; the fulfilment and distribution operation is based alongside one of our Food distribution depots.

Goods and services not for resale (GNFR).

Our Procurement function is responsible for sourcing the goods and services we need to run our businesses, such as phones and computers, uniforms and cleaning services. We buy from approximately 3,000 suppliers across five categories - Property, Logistics, HR & Professional Services, Technology & Telecommunications, and Marketing. In 2020 we spent over £1.3bn, mainly through our top 237 managed suppliers. Our largest spend category is Property, which accounts for approximately 29% of our total spend.

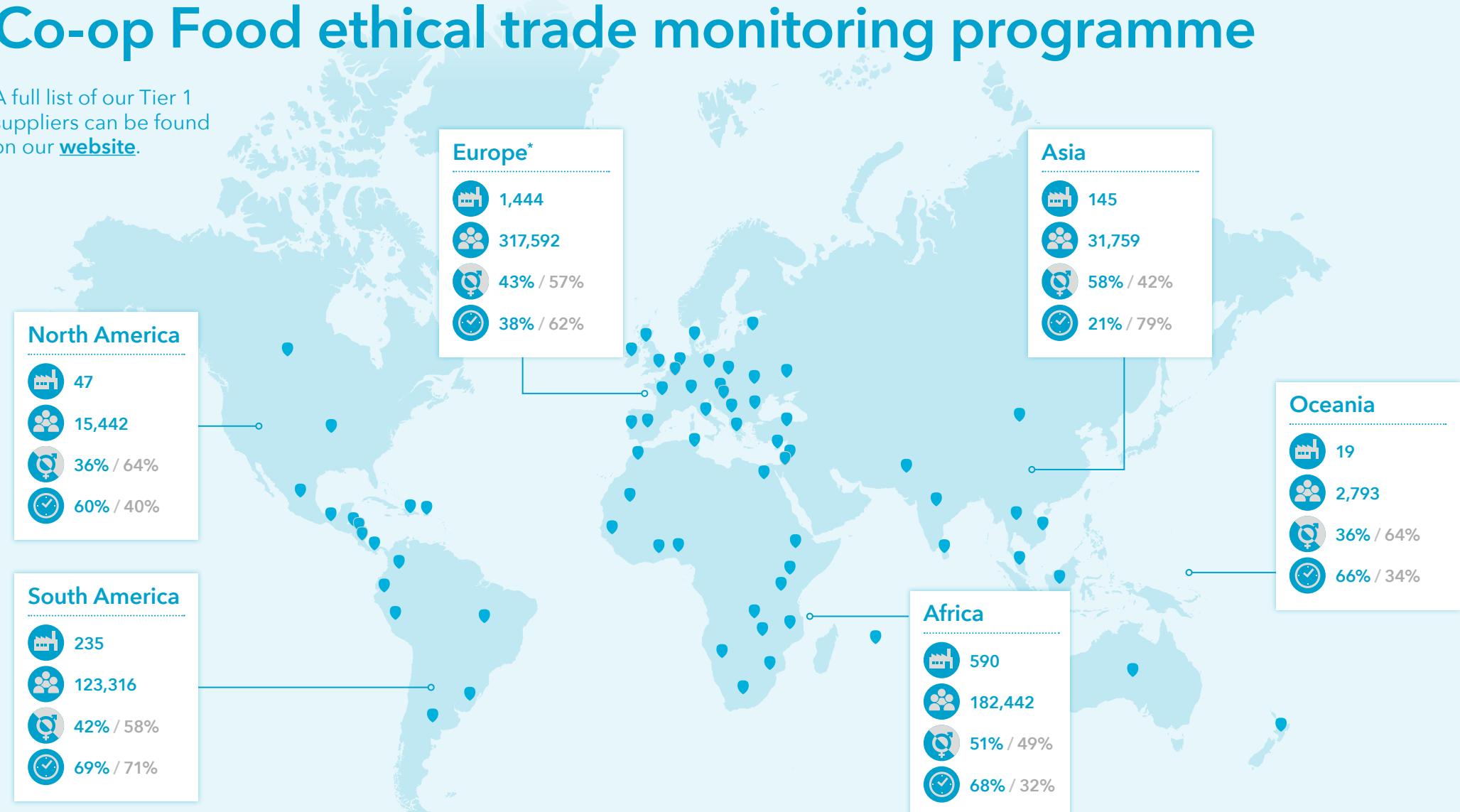
²Defined at the Co-op as dairy & frozen, produce & protein, impulse, food to go & in store bakery, bakery & local, meals & events, health and personal care, edibles, beers, wines, spirits & soft drinks, and grocery staples.

³Following a transition phase, all Nisa's Heritage brand products are also now included in the scope of the Co-op Food ethical trade monitoring programme and meet minimum ethical trade requirements.

⁴A Tier 1 site is a production site where goods are finished, ready for supply to, or sale by, the end company. A Tier 2 site is a production site that supplies goods or materials to a Tier 1 site for incorporation into the finished products. Sites 'beyond Tier 1' include sites at Tier 2 and further down the supply chain, depending on the nature and complexity of the supply chain.

Co-op Food ethical trade monitoring programme

A full list of our Tier 1 suppliers can be found on our [website](#).



 **2,480**
Total sites

 **673,344**
Total workers

 **305,463**
Female identifying workers

 **367,881**
Male identifying workers

 **350,382**
Temporary workers

 **322,962**
Permanent workers

*Europe includes all UK data. In the UK specifically, the Co-op Food ethical trade monitoring programme covers 814 sites and 173,483 workers, of which 36% identify as female and 64% identify as male. 30% are temporary workers and 70% are employed on a permanent basis.

Policies and governance

Ethical trade and respect for human rights are firmly rooted in our co-operative heritage. Our co-operative values and principles underpin not just why we value ethical trade and human rights, but also how we seek to make it a reality.

At the Co-op, we are committed to ensuring that the people and communities providing the products and services we buy and sell are treated fairly, and that their fundamental human rights are protected and respected.

Our approach to ethical trade and human rights primarily focuses on protecting the fundamental rights of workers throughout our supply chains. These encompass all international labour rights including protection from forced labour, modern slavery and harsh or inhumane treatment.

Our work is rooted in the principles of the Universal Declaration of Human Rights, core International Labour Organisation (ILO) standards, the Ethical Trading Initiative (ETI) Base Code, and national and international laws. We are guided by the UN Guiding Principles on Business and Human Rights in the way we address our responsibilities as a business to protect and respect human rights across our operations.

Policies

Our commitments on ethical trade, human rights and modern slavery are set out in a number of policies and protocols. These guide the recruitment and behaviour of our colleagues, our purchasing of products and services, and our relationships with suppliers and partners.

Our colleagues⁵

- Our Eligibility to Work process ensures that everyone who works with us has a legal right to work in the UK. This also helps ensure that we are not engaging anyone who has been trafficked and can't legally work in the UK.
- Our Whistleblowing policy encourages colleagues to speak up if they have any concerns about illegal practices going on at Co-op, and provides a clear process for them to do so. This includes any concerns around the presence of modern slavery in our business or our supply chain. We also provide access to our independent whistleblowing line to workers at our Tier 1 own-brand UK supplier sites, to help strengthen our grievance processes.
- Expectations of how our colleagues should engage with our members, customers, suppliers and the wider community are set out in our Code of Business Conduct. This also signposts our Whistleblowing process if colleagues have any concerns about the behaviour of others.

In our Food business

- Our Future of Food ambition, launched in September 2018, sets out our ethical and sustainability commitments to 2030 for our Food business. These include our 'Treating People Fairly' human rights ambitions and commitments on supply chain transparency, eliminating recruitment fees from our global supply chains, and championing the role of women and vulnerable workers.
- The workplace and employment standards that we expect of all our suppliers are set out in our Sound Sourcing Code of Conduct (SSCC). The SSCC is based on the Ethical Trading Initiative (ETI) Base Code and core international labour standards, and includes checks on forced labour and modern slavery. It is endorsed by our Chief Executive.
- The Retailer Protocol for Handling Reported Cases of Modern Slavery helps drive consistent application of good practice in how retailers handle reported cases of modern slavery that occur in their UK supply chain.
- Our Ethical Trade Guide for Co-op Technical Teams is designed to support Technical colleagues play their role in ensuring our ethical trade policies and requirements are met in our supply chains. The guide includes a new escalation process to ensure that we prioritise and address non-conformances in a timely manner.

⁵Following a transition phase, processes and policies relating to Nisa colleagues have been aligned to the Co-op's, including access to our whistleblowing line.



Goods and Services not for Resale (GNFR)⁶

- The **Third Party Supply Management Policy** guides colleagues buying products and services for use in our own business, and is supported by an ethical sourcing process and ethical screening.
- Our **One Co-op Supplier Management Framework** provides a framework for how GNFR suppliers should be managed in the Co-op, including regular ethical trade management reviews with our highest risk suppliers, and engaging with critical and strategic suppliers.
- Our **Sustainable Procurement and Supplier Policy** (SPSP) sets out the sustainability and ethical standards we expect of our suppliers of goods and services not for resale, including labour standards in our supply chain. The SPSP is part of the ethical due diligence checks we carry out when sourcing GNFR.

Our Suppliers

- Our **Supplier Guides to Ethical Trade** provide detailed guidance on our expectations of Food and GNFR suppliers in meeting our ethical standards, as set out in the SSCC and SPSP above.
- **Contracts:** Our expectation for Food own-brand suppliers to meet ethical trade requirements is included in supplier contracts and approval processes. We assess the ethical trade capability of our Food suppliers in high risk categories as part of our tender process. We also recognise the importance of longer-term contracts in supporting sustained improvements in working conditions. GNFR contracts typically contain a standard clause requiring compliance with Co-op policies, including on ethics.

We also include specific clauses on modern slavery in new contracts and a requirement to register on Sedex if requested.⁷

Governance

Development and oversight of ethics and sustainability policies take place in different Co-op-wide forums, including our Ethical Trade & Human Rights Steering Group. Our Food Policy Governance (FPG) forum has oversight on ethical trade activities from a Food perspective.

Ethics and human rights are also embedded in our risk framework, with consideration of modern slavery included in our Ethical Risk category. Oversight of the risk categories sits with our Business Risk and Audit Committee, which reports directly to the Board.

The Procurement Risk and Audit Committee (PRAC) is our GNFR governance forum for discussing risk-related issues on GNFR Sourcing and Supplier Management, including on ethical trade.

Overall responsibility for modern slavery sits with our Board, and our Modern Slavery Statement is signed off by our CEO.



⁶In 2020, the majority of Nisa's procurement and supplier management processes have been transferred to and/or aligned with the Co-op's, with the remainder being transitioned.

⁷www.sedex.com/

Assessing and managing risk

We have well-established programmes in place to ensure that workers making the products and services we sell or use are treated responsibly, and to help drive improvements in working conditions across our supply chains.

But in 2020, we've had to adapt and change our ways of working to address new risks and challenges resulting from the Covid-19 pandemic. Not only has Covid-19 impacted how we identify, assess and manage the risk of labour abuses in our supply chains, but it has also changed the nature and visibility of some of those risks.

We've identified and responded to new and emerging risks associated with labour shortages (resulting from both Covid-19 and the impact of Brexit), to the need to source from new suppliers and locations, and also to changes in worker status and immigration systems as a result of Britain leaving the EU.

The combination of these factors has led to an increased risk of modern slavery and labour exploitation in supply chains in 2020. Our strong relationships with suppliers, as well as our open and collaborative approach to ethical trade have been key to identifying and managing these risks. We've altered some of our due diligence processes, given the challenges of carrying out on-site visits and audits – for example by introducing virtual assessments, worker surveys and Direct Worker Reporting.

Sharing information and collaborating with peers and across sectors has been vital (page 14).

Our Co-op Food own-brand supply chain

When managing the risk of modern slavery and wider labour abuses, our main responsibility is for our Co-op brand suppliers and supply chains. Our food business accounts for 68% of our business (by turnover), and our Co-op brand supply chain is where we can have the biggest impact.

Co-op Food has a robust programme in place to assess and monitor labour rights issues (including modern slavery) in our supply base. Where issues are raised, we expect suppliers to put action plans in place, and we support them to address root causes of issues through our supplier engagement programme (page 12).

Assessing risk

As part of our standard risk assessment process all Food own-brand Tier 1 sites have to complete a self-assessment (SAQ) questionnaire on Sedex⁸, with Tier 1 sites in high-risk countries having an independent audit in place prior to approval.⁹ Once trade has started, our ethical trade team carries out a risk assessment of all sites on a quarterly basis, with high-risk sites prioritised for audit.¹⁰

In 2020, we enhanced our desk-based risk assessment and prioritisation using new insights and tools, including:

- **Enhanced self-assessment.** In 2020, Sedex launched a new Self-Assessment Questionnaire (SAQ) which requires suppliers to provide valuable additional information, such as workers' gender, nationality, location and contract type. The additional data enables us to understand risk in more detail, helping us identify where vulnerable workers may be at greater risk of labour and human rights abuses. We have worked closely with our suppliers to ensure that all sites completed the new SAQ.

Box 1

Virtual assessments

We've worked collaboratively to explore the potential of using Sedex Virtual Assessments (SVAs) where it has not been possible to do on-site audits due to Covid-19.¹¹ SVAs allow auditors to assess sites' performance by using video conferencing to carry out a virtual site tour, alongside an examination of sites' management systems, documentation and worker interviews. We have accepted virtual assessments in place of on-site audits on a case-by-case basis to ensure effective due diligence during 2020.¹²

⁸ Sedex ethical data exchange platform (www.sedex.com).

⁹ The list of high-risk countries has been informed by the frequency of issues, media coverage and academic research, local labour law and enforcement systems, and other expert knowledge.

¹⁰ The risk assessment process takes the following factors in to account: Country, SAQ information including worker profile (especially sites with high proportion of agency/temporary labour), industry sector, commercial importance/leverage and previous audit results.

¹¹ www.sedex.com/our-services/sedex-virtual-assessment/

¹² Based on country-level risk and the nature of issues raised in previous site audits. We may not accept an SVA where we feel face-to-face worker interviews would be necessary to assess improvements relating to previous non-conformances.

- **Additional insights on risk.** We were also able to use RADAR – a new Sedex risk assessment tool that covers risks by country and sector, and site-level risk based on suppliers' self-assessments and third party audit data.¹³ By using information from RADAR alongside our existing risk assessment processes, we will be able to better prioritise where to focus our activities.

We also adapted how we work with suppliers on the ground due to Covid-19 restrictions – using new virtual assessments, Direct Worker Reporting and worker surveys (Box 1 and Box 2). Details of our ethical trade monitoring programme are shown in Box 3.

Managing and mitigating risk

We do not rely on audits alone to tackle modern slavery and other labour rights issues. Our 'Beyond Audit' approach to managing issues includes:

- Working with suppliers to understand the root causes of issues and agreeing a course of action to resolve them fully.
- Assessing and helping improve suppliers' capacity to manage risk, using our supplier performance framework.
- Providing supplier training and capacity building ([page 12](#)).
- Collaborating with others to understand issues in the supply chain and identify solutions ([page 12](#) and our [Food website](#)).

We also use the information raised by workers through grievance mechanisms and whistleblowing lines, along with other sources of intelligence, to help identify and address concerns about working conditions including potential cases of modern slavery (Box 4).

Box 2

Direct Worker Reporting, research & surveys

Direct Worker Reporting

We have continued to work with [&Wider](#) to trial the use of Direct Worker Reporting, using mobile phones to gather feedback from workers in the UK, South Africa, Egypt and Thailand. This has been even more important in 2020, when it has been difficult to meet workers face-to-face and yet we know they are at greater risk of exploitation due to the pandemic.

Responses are providing valuable insights on issues including potential indicators of modern slavery which have helped inform our follow up activities.

Research and surveys

We supported a project led by [Partner Africa](#) which used Direct Worker Reporting to gain insight to work-related challenges faced by suppliers in Africa during the pandemic. 18 suppliers and 7,722 workers and managers took part. The project showed that business challenges have affected a range of worker welfare issues, including the impact of labour shortages on workload and overtime, family incomes, and use of transport to/ from sites to ensure social distancing.

We also supported Sedex's survey into the impact of Covid-19 on suppliers, which has helped us understand risks currently facing workers. 196 suppliers completed these surveys.

Box 3

Co-op Food ethical trade monitoring programme 2020

- 2,480 sites with over half a million workers (769 Tier 1, 1,711 Tier 2)*
- 100% of Tier 1 sites with Self-Assessment Questionnaires (SAQ) complete
- 98.8% of high-risk Tier 1 sites independently audited
- 1,600 Tier 2 sites and beyond now in our monitoring programme with SAQs complete
- 1,169 sites with valid audits
- 629 audits in 2020 (233 Tier 1 and 396 beyond Tier 1)

6,309 issues were raised in valid audits. Of those, 54 issues (0.9%) were categorised as a breach of the Sound Sourcing Code Principle of 'employment is freely chosen' (reflecting issues such as policies on forced or bonded labour being in place but not communicated to workers, occurrence of restricted toilet and rest breaks, and deposits for clothing and/or tools). 89% of the 54 issues had been addressed by the supplier by the end of 2020, resulting in changes such as new and more robust policies, clearer contracts and payment processes and increased transparency and communication to workers. See our [2020 Sustainability Report](#) for more details.

* A Tier 1 site is a production site where goods are finished, ready for supply to, or sale by, the end company. A Tier 2 site is a production site that supplies goods or materials to a Tier 1 site for incorporation into the finished products. Sites 'beyond Tier 1' include sites at Tier 2 and further down the supply chain, depending on the nature and complexity of the supply chain.

Our priority labour rights risks

In last year's Statement we shared details of how we have analysed and prioritised our labour rights risks, using information from stakeholders, publicly available human rights indicators, and country and sector-specific information.

We have identified the most significant labour rights risks in our supply base – including modern slavery – and prioritised eight areas of activity covering 17 sourcing countries (below).

1. Fresh produce, Protein – UK
2. Fish and seafood – Indonesia, Thailand, Vietnam
3. Fresh produce – Spain
4. Canned tomatoes, Fresh produce – Italy
5. Fresh produce – Egypt, Morocco
6. Fresh produce, Flowers, Tea, Wine – South Africa, Kenya
7. Non-food – China
8. Cocoa, Bananas, Sugar – Belize, Colombia, Costa Rica, Cote D'Ivoire, Dominican Rep, Peru

You can read more about these issues and the actions we are taking to address them on our [website](#).

Box 4

Issues raised in our Food supply chains through non-audit channels

We can be alerted to potential incidences of modern slavery and poor working conditions for workers in our supply chains through channels such as whistleblowing lines, grievance processes, independent helplines and media reports. A number of issues were raised through these routes in 2020, as shown below. Where possible, we take collaborative approaches to resolving issues in line with best practice policies and processes, to increase our effectiveness in tackling modern slavery.

Contact channel	Country	Issues raised in relation to the ETI Base Code
Direct supplier	Malawi	 
Direct supplier	Spain	 
Direct supplier	UK	
Whistleblower	UK	   
Whistleblower	UK	
Whistleblower	UK	
Whistleblower	Zimbabwe	
Media	Spain	  
Media	Spain	 

The ETI Base Code

-  Employment is freely chosen
-  Freedom of association and the right to collective bargaining are respected
-  Working conditions are safe and hygienic
-  Child labour shall not be used
-  Living wages are paid
-  Working hours are not excessive
-  No discrimination is practised
-  Regular employment is provided
-  No harsh or inhumane treatment is allowed

Products and services we use in our own business

In 2020 we reviewed our existing Procurement Sustainability Strategy to ensure it aligned with new and emerging priorities, including Covid-19 and Diversity and Inclusion. The resulting new GNFR Ethical Trade, Sustainability and Shared Value Strategy was launched in August, along with a new working group to help embed the strategy across the business and strengthen the way we work with our suppliers.¹⁴

The working group comprises five workstreams.¹⁴ The Ethical Trade and Labour Standards workstream is helping ensure that management of modern slavery and other labour rights are fully embedded within our category management process.¹⁵ In 2021, this group will help inform the further development and implementation of our ethical risk management programme and our approach to ethical audits (below).

Assessing risk (GNFR)

As set out in last year's Statement, the process we use to help identify high-risk suppliers and manage the risk of modern slavery in our GNFR supply chains includes:

- Carrying out a desk-based risk assessment and screening of new GNFR ethical high-risk suppliers against our Sustainable Procurement and Supplier Policy (SPSP).¹⁶

- Prioritising risk for each category, based on broad criteria including: the amount of temporary and migrant labour typically used in the sector; the proportion of low-paid, unskilled labour involved in the product or service; and information from media and NGOs.
- Incorporating questions which will flag ethical and sustainability risk factors in all Request for Proposals, and asking tailored questions for the highest risk categories.

In 2020, we continued to focus our activities on our highest-risk GNFR categories: Co-op branded goods (eg carrier bags and uniforms); Construction; Facilities Management (including Waste and Recycling); Warehousing Services; IT and electronics and Temporary Labour Providers.

Managing and mitigating risk (GNFR)

Our GNFR ethical trade monitoring programme focuses on our higher-risk, strategic suppliers – see Box 5. This approach is underpinned by our Supplier Management Framework, which standardises how we work with suppliers and helps ensure that modern slavery and labour standards are included in supplier meetings as well as our management of third-party risk.¹⁷



¹⁴ The workstreams are: Diversity & Inclusion; Shared Value; Covid-19 Response; Ethical Trade & Labour Standards and Environment.

¹⁵ Including the development, assessment and award of tenders, and supplier management.

¹⁶ For high ethical or environmental risk contracts with total anticipated spend of over £100,000 over their lifetime. This process also applies to non-food own-brand products and services we sell in other parts of the business.

¹⁷ The Supplier Management Framework also sets out how we segment suppliers into 'strategic, critical, operational and transactional'. As part of the criteria for supplier segmentation, ethical risks are assessed and scoring incorporates information from our ethical risk management processes such as Sedex and ethical screening.

Box 5

GNFR ethical trade monitoring programme 2020

We require all high-risk strategic GNFR suppliers to register on Sedex and complete a Self-Assessment Questionnaire (SAQ).

Following the launch of Sedex's new SAQ in 2020, our focus has been on engaging the in-scope suppliers in the completion of the new questionnaire.

In 2021 we will be analysing information from the SAQs and using this to further develop our ethical trade monitoring programme.

84 suppliers in scope*

119 sites linked to us on Sedex

118 SAQs complete

6 audits

* A further 8 suppliers are engaging with us via a similar ethical monitoring programme, which provides us with a satisfactory view of their due diligence processes.

We had to pause the development of our ethical audit strategy in 2020, due to both the launch of the new Sedex SAQ - which required significant resource input from both Co-op and our suppliers - and the difficulty of carrying out on-site audits during the Covid-19 pandemic. We will be progressing this work in 2021, building on lessons from our Direct Worker Reporting trials (Box 6) and further development of alternative approaches to on-site audits.

We've also started using the new reporting capability and additional insights available from Sedex (page 8) to inform our approach to risk assessment and supplier management.

We will be using information from completed SAQs to better understand how well-equipped suppliers are to identify and manage ethical risks for their business, by assessing the management controls they have in place. This insight will inform both our audit strategy and our expectations of suppliers in terms of developing their own policies and processes.

Responding to Covid-19. Our ethical trade programmes need to be able to respond to changes in operating conditions, and to new and emerging risks.

- In 2020, as a result of Covid-19 and the increased staff absence caused in our Logistics network, we had to secure additional contingent labour supply to ensure we could continue operating effectively. As this coincided with a formal review of our temporary labour providers, our priority was to secure this additional labour from agencies involved in the planned review and was therefore subject to our standard due diligence checks. Where this wasn't possible - for example due to geographic location of the depots - all agencies were subject to our ethical screening process and requirements of our Supplier Guide to Ethical Trade.
- Like many businesses, we also needed to source significantly increased volumes of PPE at short notice. As a media spotlight was shone on labour and human rights issues in the supply chain of PPE items, we increased our engagement with our own PPE supply chain. As a result, we engaged directly with key 'indirect' suppliers to better understand their management of human rights issues. This has prompted us to review the scope of indirect suppliers we include in our ethical risk monitoring programme. This work will continue in 2021 and we will work closely with our direct supplier to manage the risks in this sector.

As with our Food ethical trade programme, we do not rely on SAQs and audit alone. In 2020 we have been trialling the use of Direct Worker Reporting' - see Box 6.

We have also continued our work to understand and address risks in the waste and recycling sector through our leadership of the IPhR Waste and Recycling Working Group. We expect this work to progress further in 2021 (page 14).

Box 6

Direct Worker Reporting with in-store cleaners

In 2020 we trialled the use of Direct Worker Reporting with some of our providers of in-store cleaners. Collectively these suppliers provide around 2,000 cleaners across our Food estate. Using automated calls and mobile-friendly questions, workers are able to report directly and anonymously to &Wider, enabling us to gather insight and identify priorities for action.

Automated calls are made to workers in a minimum of two 'call cycles' to enable the tracking of progress over time. The first call cycles were completed in 2020, with second call cycles scheduled for early 2021.

Completion of the two call cycles in early 2021 will help us to fully review this approach and its suitability for use with UK-based service providers. At a minimum, the programme has enabled us to engage further with our cleaning suppliers on ethical trade issues, and to gain insight on workers' conditions at a time when standard on-site ethical audits have not been possible, due to Covid-19.

Training and collaboration

Our suppliers and colleagues play a major role in helping us make sure that slavery and human rights abuses don't take place in our business or our supply chains.

This year more than ever, training and wider collaboration have been key to helping identify, manage and mitigate the risks of modern slavery and human rights abuses.

We've come together with other retailers, businesses, NGOs and government bodies both in the UK and overseas, to share information, develop new tools and guidance, and support our colleagues and suppliers as they operate in a Covid-safe way.

Co-op Food supplier engagement

We have a well-established ethical trade supplier engagement programme¹⁸ which provides bespoke and interactive training for Co-op Food suppliers in our key focus countries.¹⁹ This year, we've worked hard to develop new training and guidance to reflect new and emerging risks due to Covid-19, as well as finding different ways of delivering that information.

- **'Covid response' supplier webinars.** We played a leadership role in bringing together a coalition of supermarkets and partners to provide a series of eight free webinars to over 4,000 participants across 57 countries.²⁰ The webinars provided suppliers and workers globally with consistent guidance and support to help identify and manage the potential human rights impacts of Covid-19.

- **Responsible recruitment training.** We know that the pandemic has increased the risk of poor practices in the recruitment and supply of workers, including increased risk of exploitation and modern slavery. As a sponsor of the Responsible Recruitment Toolkit (RRT), our suppliers were able to access unlimited free places on a range of new online training courses, as well as free access to tools and guidance on responsible recruitment practices – see Box 7.²¹
- **Launch of FoodFarmHelp.** We supported the launch of FoodFarmHelp – a website providing guidance, tools and case studies to help businesses in the food, agriculture and horticulture industries to better manage Covid-related risks during the winter period. In 2020 over 1,100 people joined two Covid-19 'Winter Response' webinars.

Box 7

Responsible recruitment

In 2020, through our sponsorship of the Responsible Recruitment Toolkit, we supported the delivery of two face-to-face training sessions and 11 online sessions reaching 55 delegates from 30 suppliers on responsible recruitment and elimination of recruitment fees.

Co-op Food supplier engagement in 2020

35 supplier events

6,872 delegates reached

4,166 sites included

over 16,300 hours of supplier training/engagement

- **Ethical recruitment in China.** We've identified our non-food²² supply chains in China as one of our eight priority human rights risk areas. In 2020 we sponsored an Ethical Trading Initiative (ETI) webinar on ethical recruitment practices, specifically addressing the risks of forced labour in China. The webinar was delivered in Mandarin and reached 32 in-country agents, suppliers and site management teams. Following the webinar, we shared a practical ETI guide on ethical recruitment in China and are working with our key suppliers to implement this best practice.

¹⁸ www.coop.co.uk/our-suppliers/ethical-trading

¹⁹ The 17 sourcing countries linked to our priority human rights issues (page 9).

²⁰ Supermarkets: Aldi, Asda, Lidl, M&S, Morrisons, Ocado, Sainsbury's, Tesco and Waitrose. Partners: ETI, Sedex, the ALP and FNET.

²¹ Including guidance to support responsible recruitment of workers during Covid-19. responsiblerecruitmenttoolkit.org/Covid19/

²² Eg toys, paper goods, kitchenware, sports equipment, cleaning products, and packing facilities.



- Good hiring practices in Belizean sugar cane farming.** We supported a new initiative to help cane farmers and workers to formalise their work by introducing an agreement between cane cutters and harvest group leaders. The project also promotes written contracts of employment and good labour practices through workshops and training. A 'Booklet for Good Hiring Practices in the Cane Farming Sector' was produced for the 2020 harvest in partnership with Fairtrade Foundation, Tate & Lyle and other local stakeholders.
- Stronger Together UK modern slavery resources.** We're a founding sponsor of Stronger Together – a multi-stakeholder initiative which provides

training and resources to help reduce modern slavery. In 2020, our Food suppliers had free access to the new updated toolkit and advanced workshop on tackling modern slavery. Overall, we supported the delivery of 20 workshops to 61 delegates on reducing modern slavery in UK and global supply chains. We ask our strategic suppliers²³ to use the [Stronger Together Progress Reporting Tool](#) to assess their modern slavery prevention strategies and to report their progress in their annual review meetings with Co-op. In 2020, 80% of strategic suppliers' scores had increased from the previous year.

- UK Ethical Trade Forums.** In 2020 we moved both our Strategic and our Regional Ethical Trade Forums online. Modern slavery was a focus for both groups – with industry experts sharing information on the potential increase in risk of modern slavery as a result of the new UK immigration system. Suppliers also shared case studies on handling incidences of modern slavery in the supply chain, and impacts of Covid-19 on effective communication.
- Spain Ethical Trade Supplier Forums.** We've run regular events in Spain since 2012, and played a key role in creating the Spain Ethical Trade Forums in Murcia, Almeria and Huelva. As might be expected, responding to Covid-19 was a priority for the forums in 2020, with 1,416 participants taking part in 20 online events/seminars. Outputs from the various working groups in 2020 include guides on [Covid-19](#), [Anti-Harassment](#) and [Responsible use of Agencies](#), as well as a report on [Workers Voice pilot surveys](#).

Further information on the events we supported and ran in 2020 can be found in our [Sustainability Report](#).

Training and engagement in GNFR

Colleagues working with GNFR suppliers

In 2020, following the launch of our new Ethical Trade, Sustainability and Shared Value Strategy, we introduced an online learning programme for colleagues across the business who are involved in purchasing goods and services or dealing with suppliers. All three modules promote consideration of modern slavery risks when purchasing GNFR goods and services.

Ethical risk workshops: Logistics and Warehousing

In January we held a risk-assessment workshop for Co-op colleagues involved in our third party logistics operations. Participants identified existing and emerging human rights risks – such as potential impacts of new border controls on trafficking – and developed an action plan to manage these risks.

Following on from this, the Indirect Procurement Human Rights (IPHR) Forum, along with FNET and Stronger Together, supported the UK's first Warehousing and Logistics event focused on 'Tackling Labour Exploitation Supply Chain Risks Together'. Participants heard from business and government experts about forced labour risks in the sector, and how labour shortages, Brexit and other legal changes will impact these in future. They were given practical insights to help them tackle these issues in their businesses and to support the delivery of their Modern Slavery statements.

The event was aimed at warehousing and logistics providers to UK companies; all of Co-op's third-party labour providers were invited to participate.

²³ In 2020 Co-op Food had 26 strategic suppliers who can benefit from longer-term contracts, investment in innovation, and increased business.

Across our own business

Raising colleague awareness

In October, we marked International Anti-Slavery Day by running awareness-raising activities, including a 'Lunch and Learn' session for Co-op colleagues, which provided insight on Co-op's approach to tackling modern slavery including how to 'Spot the Signs'. We also published a series of blogs.

Wider collaboration and activity

In the Food sector

We're committed to working collaboratively to help increase our effectiveness in tackling modern slavery. We're active members of the Ethical Trading Initiative (ETI), Stronger Together, the Gangmasters & Labour Abuse Authority (GLAA), Sedex and FNET (Food Network on Ethical Trade), and continue to play an active part in other collaborative working groups across the industry and more widely.

We forged a number of new collaborations in 2020, some of which were created specifically to respond to the challenges presented by Covid-19.

- We became a founding member of the Modern Slavery Intelligence Network – a non-profit collaboration between companies in the UK food sector. The Network aims to develop a structured intelligence-sharing mechanism between members, which will enhance our effectiveness in disrupting modern slavery and labour exploitation practices.
- We joined Unseen's Helpline Business Portal which gives us access to Helpline reports of modern slavery or labour abuse within our operations and supply chains, as well as unique trend analysis.

This partnership helps support the 24/7 operation of the independent Modern Slavery & Exploitation Helpline, which provides a vital lifeline to those with nowhere else to turn and expert guidance to frontline professionals.

- In June 2020 we launched our Global Wellbeing Charter, a new initiative providing close to £1m to help support global projects and people in our supply chain during the Covid pandemic.
- We were successful in getting funding through the Foreign, Commonwealth and Development Office's (FCDO) Vulnerable Supply Chains Facility for two projects to help build resilience of workers in East Africa to the impact of Covid-19, in collaboration with the Fairtrade Foundation, the Ethical Trading Initiative and other retailers and suppliers. We are supporting projects in flower and agriculture supply chains.²⁴

We also continued to participate in a range of existing collaborative initiatives including:

- **Stronger Together Spain.** Our continued support for Stronger Together Spain provides our suppliers with access to free and discounted places at workshops, workplace posters and leaflets. Key topics addressed in 2020 included preventing and tackling forced labour in Spanish horticulture.
- **Food Network for Ethical Trade.** In 2020 FNET members collaborated to respond to the impact of Covid-19 globally through sharing intelligence and developing guidance.
- **Seafood Ethics Action (SEA) Alliance.** We are founding members of the SEA Alliance which was established to respond to human rights issues in seafood supply chains. In 2020, the SEA Alliance carried out a top-level human rights risk

assessment for fisheries supplying Co-op and other members. This helped identify fisheries with the greatest potential risk to workers, including forced labour and trafficking.

In the Waste and Recycling sector

Our collaborative work with members of the Indirect Procurement Human Rights (IPHR) Forum continued to progress well in 2020.²⁵ Co-op chairs the IPHR Waste and Recycling Working Group, which has established itself as a truly cross-industry working group to address modern slavery and human rights in the sector. Over 20 different organisations actively participate in the group, representing brands, retailers, waste service providers, government bodies and NGOs.

Much of our activity in 2020 has focused on raising awareness of modern slavery and human rights risks in the sector, extending our network, and attracting media coverage. As leaders for the working group, Co-op took part in a webinar panel alongside other thought-leaders on this topic. In 2021 we will increase our collaboration with other partners and continue to develop resources for the sector, which will be made publicly available.

With Manchester businesses

The Greater Manchester Business Network on Modern Slavery continued to meet in 2020. Network members DWF and Regatta hosted the first two meetings of the year, sharing insights on their own approach to modern slavery and inviting their suppliers to talk about their work. The Co-op hosted the third event, providing an opportunity to hear from Co-op colleagues and suppliers, and discuss challenges and solutions to tackling modern slavery during the pandemic.

²⁴ More information can be found at: www.gov.uk/government/news/uk-aid-to-protect-high-street-supply-chains, www.fairtrade.org.uk/media-centre/blog/how-fairtrade-and-partners-are-helping-flower-workers-flourish, www.ethicaltrade.org/programmes/securing-workers-rights-covid-19-context-east-and-southern-africa

²⁵ The Indirect Procurement Human Rights (IPHR) Forum is a group of UK retailers, brands and manufacturers with a common vision to protect and respect human rights in their GNFR supply chains, and to facilitate collaborative responses to shared risks. The Forum is led by a Steering Group which oversees four working groups - Labour Providers, Waste and Recycling Services, Onsite Services, and Communications and collaboration.

Campaigning

In all our efforts to help prevent modern slavery in our business and supply chains, we never lose sight of those affected by modern slavery.

Our modern slavery statements have charted the progress we've made on our campaigning activities since 2016 – including our support for better legislation and the need for businesses to report on actions taken to prevent modern slavery, through to wider awareness-raising and campaigning for better support for victims. The launch of our Bright Future programme to provide work opportunities for those rescued from slavery also features.

Our intention has been to help create momentum and act as a catalyst to change the way businesses think about modern slavery and the support for those affected by it. This year we reached a milestone with several strands of our campaign coming to fruition, including the establishment of our Bright Future programme as an independent co-operative organisation ([page 16](#)).

We commissioned an independent review of our campaign in October 2020. We will share the findings of the work, which is being carried out by the Rights Lab at the University of Nottingham in 2021.

Better support for victims

- **The value of transport.** In 2020 we co-funded a project to assess the potential benefits of providing survivors of modern slavery with increased funding for transport.²⁶ The research was undertaken by independent consultant Amelia Knott who worked with the charity Hestia (a Bright Future partner). The report, 'Journey to recovery', was published in November 2020 and the findings will be used to lobby Government to fund public transport costs of survivors of modern slavery.
- **Employability and confidence building.** Last year we co-funded and helped shape a Summer School on employability for survivors of modern slavery. The event, due to take place at St Mary's University in 2020, was postponed due to the pandemic and will now be held in summer 2021.
- **Training framework for victim support.** We supported the development of a Training Framework for those involved in identifying, supporting and caring for victims of modern slavery. The framework was developed by Lara B undock (Snowdrop Project) and Dr Kathryn Hodges (Centre for the Study of Modern Slavery at St Mary's University) before being published in September 2020. The Co-op provided £25,000 to support this project, with further funding from the Albert Gubay Charitable Foundation.

- **Business Against Slavery Forum.** We continued to participate in the Home Office Business Against Slavery Forum (BASF) in 2020. We played a key role in designing and producing a major conference for businesses to share learning and discuss challenges, which was due to be held in March 2020, but was unfortunately cancelled due to the pandemic.

Bright Future

We launched our Bright Future programme in March 2017 – working in partnership with the charity City Hearts to offer the chance of a paid work placement and a job in our Food business to those who've been rescued from modern slavery.

Bright Future placements in 2020

It has been challenging to facilitate Bright Future placements in 2020, due to the impact of Covid-19 in the workplace. Like many food retailers, colleagues in our food stores were operating under great pressure. Requiring additional staff quickly, and with a growing pool of qualified candidates to select from, store managers had limited time to support placements. Some Bright Future business partners faced similar challenges, with others having to lose or furlough staff, unable to take on Bright Future candidates.

There were 81 referrals to the National Matching System in 2020, making a total of 266 since Bright Future started. In 2020 we created 9 placements - 4 in the Co-op Group and 5 more in other businesses (Pilgrims, Marshalls plc and JD Sports) - making a total of 79 placements since the programme began. A total of 47 survivors have been offered a permanent role with their employer since Bright Future started.

Establishing Bright Future as a Co-op

In May 2020, Bright Future became an independent co-operative, registered with the Financial Conduct Authority (FCA) by 9 founding member organisations.²⁷

The new Board of Bright Future is working with Co-operative Futures to establish robust governance structures, with the aim of enabling current charity and business partners to become members of Bright Future Co-operative in 2021.

Bright Future

Bright Future in 2020

37 charity and referring partners²⁸

26 businesses engaged²⁹

81 referrals to Bright Future

9 candidates started placements

Founding members have secured funding to ensure that City Hearts can continue to facilitate Bright Future placements without interruption during this transition stage, following which it is anticipated that business members will pay an annual fee to cover ongoing running costs.

In 2020, we provided £20,000 to fund City Hearts to continue to run the National Matching System that underpins Bright Future.

We will continue to be involved in Bright Future and provide employment opportunities for survivors of modern slavery in 2021. However, as Bright Future completes its transition the Co-op will move to a supporting rather than driving role in the new co-operative.

The evolution of Bright Future and the Co-op's contribution was highlighted in the UK Government Modern Slavery Report published in October 2020.

“This has been life-changing for the client. We are so grateful for the Bright Future placement in helping to end the cycle of exploitation, and giving him the opportunity for fair and safe employment.”

Mischa Macaskill,
Survivor Advocate at City Hearts



Phill Clayton, of City Hearts, addresses Bright Future Partners Summit



The Midcounties Co-operative



Founding members of Bright Future Co-operative

²⁷ City Hearts (UK), Co-operative Group Limited, Dixons Carphone PLC, Haven of Light CIC, Hull Homeless Community Project, Marshalls plc, The Midcounties Co-operative, Sophie Hayes Foundation and Tulip Limited.

²⁸ Charity/Referring Partners: Adavu, Ashiana, ATLEU, Black Country Women's Aid, Bournemouth Churches Housing Association, Caritas Bakhita House, Children's Society, City Hearts, Clewer Initiative, Croydon Council, ECPAT, Ella's Home, Flourish NI, GLAA, Haven of Light North Wales, Hestia, Hope at Home, Hope for Justice, Hull Homeless, Jericho Foundation, Kalyaan, Khai Tzedek CIC, Life Share, Medaille Trust, Migrant Help, Olallo House, Palm Cove, Porchlight, Salvation Army Bradford, Snowdrop Project, Solace Womens Aid, Sophie Hayes Foundation, South Essex Rape & Incest Crisis Centre, Southwark Children & Adults Services, Spring Housing, Stop The Traffick, Unseen.

²⁹ Business partners: 2 Sisters Food Group (2SFG), ABP Beef, Angus Soft Fruits, Arco, Co-op East of England, Co-op Group, Co-op Midcounties, Costain, Danny Sullivan Group, Dixons Carphone, Flamingo Flowers, Fresca, Greencore, IPL, JD Sports, John Lewis Partnership, Marshalls plc, Norse Group, Princes, Single Resource, Sir Robert McAlpine, Staffline, The Body Shop, Tulip, Typhoo Tea, VGC.

Tracking our progress

We set ourselves some challenging targets on modern slavery last year. Overall we have achieved or are on track with 6 of the 13 targets we set ourselves, close to target on a further 3, and behind with or not yet met 4 of our targets. We've included updates in this Statement, but for full transparency we have summarised our progress against each target in the table on pages 18-20.

Targets for 2021 and beyond

We'll be building on the activities and progress we've made over the past year, and have signalled some of our planned areas of focus in this Statement. Specific targets for 2021 and beyond are shown below.

Managing the risks of modern slavery

In our food business

- We will improve the lives of workers, by carrying out and publishing independent human rights impact assessments in three high-risk food supply chains in 2022, using our findings to drive change
- We will champion the role of women and vulnerable people in our supply chains and will develop and launch a gender strategy in 2021 [Rolled over from 2020]
- We are committed to supply chain transparency and will share details of suppliers at all tiers of three of our highest-risk food categories by the end of 2021 [Rolled over from 2020]
- In 2021 we will work with key suppliers to map the use of recruitment fees and identify hotspots, and develop action plans to meet our goal to eliminate illegal and unfair recruitment fees in our global supply chain by 2025 [Rolled over from 2019]

In our other operations

- In 2021 we will review SAQs from all suppliers in scope of Funeralcare's ethical sourcing programme and develop mitigation plans for identified risks
- In 2021 our providers of warehouse and driver contingent labour will complete the Responsible Recruitment Toolkit assessment, and work with us to make improvements where needed
- We will review and develop our ethical risk management strategy, building a revised ethical audit strategy for implementation in 2021

Training and collaboration

- We will deliver training on Sedex to the GNFR procurement team, to enable them to work effectively with suppliers and drive change
- We will complete training of key HR colleagues to identify, report and manage potential modern slavery cases in our own business, and include in their inductions [Rolled over from 2018]

Campaigning on modern slavery

- We will continue to provide access to work placements and paid employment in the Co-op Group, as part of our support for Bright Future

Progress against our 2020 targets

What we said we'd do in 2020	How have we done?	What have we done?
1(a). Managing the risk of modern slavery in our Food business		
We will improve the lives of workers, by carrying out and publishing independent human rights impact assessments in three high-risk food supply chains in 2021, using our findings to drive change.	Behind schedule	This programme of work was put on hold in 2020 due to impact of Covid-19 and the related challenges of carrying out field work. We will continue our assessments in 2021.
We will champion the role of women and vulnerable people in our supply chains and will develop and launch a gender strategy in 2020.	Close to target	Our focus in 2020 has been on responding to the impacts of Covid-19 on suppliers and workers. However, through the new Sedex SAQ (page 7), we are now able to collect and share gender-disaggregated data from suppliers, which is helping inform our work to improve gender equality in our supply chains. In 2020, we also supported two FCDO funded projects which have a focus on gender (page 14). We will launch our gender strategy in 2021.
We are committed to supply chain transparency and will share details of suppliers at all tiers of three of our highest-risk food categories by the end of 2020.	Behind schedule	In 2020 we mapped our seafood supply chains beyond T1, and worked with suppliers to onboard Tier 2 sites in high-risk countries to Sedex. However, we had to de-prioritise this work due to Covid-19. We expect to meet this target by the end of 2021.
By 2020 we will work with key suppliers to map the use of recruitment fees and identify hotspots, and develop action plans to meet our goal to eliminate illegal and unfair recruitment fees in our global supply chain by 2025 (Outstanding from 2019).	Close to target	We are continuing our work to understand and map the use of recruitment fees in our supply chains. We have made the Responsible Recruitment Toolkit free to our suppliers and rolled out collaborative training sessions (page 12). Our key suppliers will have agreed action plans on addressing recruitment fees in 2021.

Progress against our 2020 targets

What we said we'd do in 2020	How have we done?	What have we done?
1(b). Managing the risk of modern slavery in our other operations		
In 2020 we will work with the Indirect Procurement Human Rights (IPHR) Working Group on Waste to map waste-processing supply chains, develop resources and build collaborative partnerships to help build suppliers' capacity to identify and manage risk of modern slavery and other labour abuses.	Achieved	Initial work to map supply chains has improved understanding of 'flows of waste' (up/downstream) and how they are managed, while revealing the complexity of supply chains in this sector. The Working Group has developed collaborative relationships with NGOs, government regulators and service providers, and is working with <u>Stronger Together</u> to adapt key resources to help the waste & recycling sector.
In 2020 we will work with our key cleaning suppliers to identify potential risks and interventions needed to protect vulnerable workers.	Achieved	In 2020 we worked with our cleaning suppliers to pilot the use of Direct Worker Reporting, to help us better understand working conditions and potential issues for cleaners across our estate (page 11). A second call cycle is scheduled for early 2021.
We will reduce the impact of identified risks by conducting meetings with 80% of our GNFR strategic suppliers identified as highest ethical risk (Outstanding from 2019).	Achieved	Supplier management meetings have been held with all our highest ethical risk strategic suppliers (in IT, Property and Logistics).
We will hold a risk-assessment workshop for our Logistics category (Outstanding from 2019).	Achieved	In January 2020 we held a risk-assessment workshop for Co-op colleagues involved with our Third Party logistics suppliers and operations (page 13).

Progress against our 2020 targets

What we said we'd do in 2020	How have we done?	What have we done?
2. Training, capacity building and collaboration		
By the end of 2020 we will embed training on effective workplace communication, grievance mechanisms and providing access to remedy in our Food supplier engagement programme.	Achieved	<p>In 2020, we refocused much of our training to help Food suppliers address the impacts of Covid-19 in the workplace (page 12). Effective workplace communication and access to remedy was a key part of this, including:</p> <ul style="list-style-type: none"> - revisiting the Effective Communication Toolkit for Multi-Language Workforce with suppliers; - discussions on building more inclusive workforces; - sessions on handling bullying and harassment, detecting and managing issues, and innovative ways of engaging workers and improving communication.
We will complete training of key HR colleagues to identify, report and manage potential modern slavery cases in our own business, and include this in their inductions (Outstanding from 2018).	Behind schedule	<p>In 2020, 68% of key colleagues in our HR Services team completed the training (following delays due to technical issues with our online learning system). The roll-out to key teams will be completed in 2021, along with a review of content for inclusion in inductions.</p>
3. Campaigning on modern slavery		
We will continue to provide access to work placements and paid employment in the Co-op Group, and support Bright Future meet its target of 300 placements by 2020.	Behind schedule	<p>We continued to provide placements to Bright Future candidates in Co-op Food stores in 2020, though numbers are significantly lower than anticipated. It was not possible to offer new placements during the height of the pandemic, and although we were one of the first Bright Future business partners to re-commence placements, it has been challenging to support candidates this year. Bright Future's overall goal of 300 placements has been significantly impacted.</p>
We will support Bright Future to become an independent, sustainable partnership from 2020 and beyond (with the Co-op as a partner) so that victims can continue to access work placements and paid employment in the future.	Achieved	<p>Bright Future (Co-operative) Limited was registered with the FCA in May 2020 with Co-op Group as a Founding Member (page 16). Co-op's Senior Campaigns and Public Affairs Manager is a Director on the new Board.</p>
We will produce a full report of our campaign activities 2017-19 ('Three years on') to raise awareness of Modern Slavery and make the case for enhanced Government support (Outstanding from 2019).	Close to target	<p>We commissioned an independent review of our campaign in October 2020. We have extended the period covered by the review to include work carried out in 2020. The report, which is being prepared by the Rights Lab at the University of Nottingham, will be available in early 2021.</p>

Co-operative Group Limited

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