

# UK Ethical Business Report

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Whitepaper



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# Foreword

**The introduction of the Modern Slavery Act (2015) by the then UK Home Secretary, Theresa May saw global praise and some criticism. A piece of landmark legislation, the Modern Slavery Act heralded a significant step forward in recognising and addressing the issue of human trafficking and modern slavery.**

Intended to increase awareness and transparency in supply chains, the legislation has continued to require UK businesses with a turnover above £36m to publicly disclose their commitment and efforts in preventing modern slavery.

Whilst its introduction has received praise and has been a catalyst for similar legislation like the Australian Modern Slavery Act (2018), its limitations regarding enforcement and safeguarding have been highlighted, including upon its introduction as well as more recently.

Following its introduction in 2015, the Act has been subject to scrutiny and several formal reviews by NGOs and charities, parliamentary committees, and members of both the House of Commons and the House of Lords. Reviews have included recommendations to mandate elements of due diligence in the supply chain, introduce robust enforcement for non-compliance and develop effective remediation and safeguarding measures.

Several elements of the Modern Slavery Act have acted as a precursor for other supply chain due diligence and anti-modern slavery legislation that have been proposed or adopted globally. Increasingly, businesses in Australia, Canada, the EU and India are expected to develop OECD-aligned human rights due diligence processes and report on the outcome of their activities.

Whilst legislation is yet to be introduced in the UK which matches these requirements, many proactive UK businesses have recognised that there are issues in their industries and have sought to develop more effective approaches to prevent modern slavery.

Our Ethical Site Survey Whitepaper draws upon data that has been collected through the activities that Achilles has undertaken on behalf of our UK clients. Private and public sector bodies who have proactively undertaken evaluation of their own supply chains to address the issue of modern slavery, particularly those in the UK construction industry.

## Acknowledgements

Since the introduction of the Ethical Business Programme, many individuals, companies, charities, academics, government and non-government bodies have cooperated with us. Their cooperation has contributed both directly and indirectly to the success of the programme in recent years.

We would like to acknowledge the following businesses and bodies who have been instrumental to the success of the programme, the list is non exhaustive and there are many others that have helped to refine the programme as it is today:

- Scape
- Unseen
- Mercaston Solutions
- Rights Lab, University of Nottingham
- Balfour Beatty
- Kier
- The Crown Estate
- Great Portland Estate
- British Land
- Wates
- Yorkshire Water
- McLaughlin & Harvey
- Morgan Sindall
- John Sisk
- Willmott Dixon
- Legal & General
- Lendlease
- Sir Robert McAlpine
- Multiplex





“Achilles’ Ethical Site Survey work is an essential contribution to understanding the nature and extent of exploitation in this high-risk sector in the UK. The findings contain important messages, including from those most affected, about how to tackle this significant problem. We are excited to partner with Achilles to turn these insights into action, and to support private, public and third sector actors in ensuring construction work is decent work.

We join Achilles in encouraging businesses across sectors to continue centering workers’ voices as they monitor recruitment and working environments, for a full picture of potential labour problems.”

*Rights Lab, University of Nottingham*

## The Programme

Introduced in 2018 to respond to several client requests to help align to the due diligence requirements of the Modern Slavery Act, the Ethical Business Programme aimed to identify potentially unethical employment practices and modern slavery indicators in the UK construction sector. At the heart of the programme is Achilles’ philosophy, built on over 30 years of transparency and collaboration.

Since its introduction, the programme has continued to evolve and adapt to the dynamic employment landscape in the UK. Achilles, our clients and partners have engaged collaboratively with government enforcement agencies and public and private sector groups to provide insight into our findings. As recently as November 2024, analytics from the programme has been shared with Members of Parliament and the Anti-Slavery Commissioner for New South Wales.

Consisting of three key elements, confidential interviews with workers (known as Ethical Site Survey), management system audits (known as Ethical Business Audits) and analytical reporting, Ethical Site Surveys have been undertaken on hundreds of construction sites and involved the confidential surveying of over 10,000 workers. Hundreds of Ethical Business Audits have also been undertaken to follow-up on findings raised at site level, providing a more robust due diligence process.

Analytical reports at site level and at sector level have enabled us to collaborate closely with our partners to identify potential improvement initiatives that we believe will help to drive long term benefits for workers in high-risk industries like the construction industry.

# Data Insights

Our whitepaper focuses specifically on the programme between 2019 and 2023. In that time Achilles has visited hundreds of construction sites across the UK and Ireland. The data contained within this report is specific to site surveys undertaken between 2021 and the summer of 2024 where data collection approaches were standardised in alignment with client requirements, this standardisation has allowed for greater levels of analysis and benchmarking across regions, industries and trades.

The profiles presented within the report have been normalised to consider the proportions of workers interviewed in specific locations, from certain nationalities or those that are involved in a particular trade.

Each profile has been developed based on the following assessment criteria:

- Whether an individual raised an issue against a specific survey topic
- The geographical location that the interview took place
- The role of the individual
- Their immigration status
- Their employment status
- Their type of employment
- Their average age
- Their nationality

By analysing responses in this manner, we hope that the data becomes a more valuable tool to identify specific regions, trades or nationalities who may require increased support or intervention.

**Data Collection:** Between 2021 & 2024

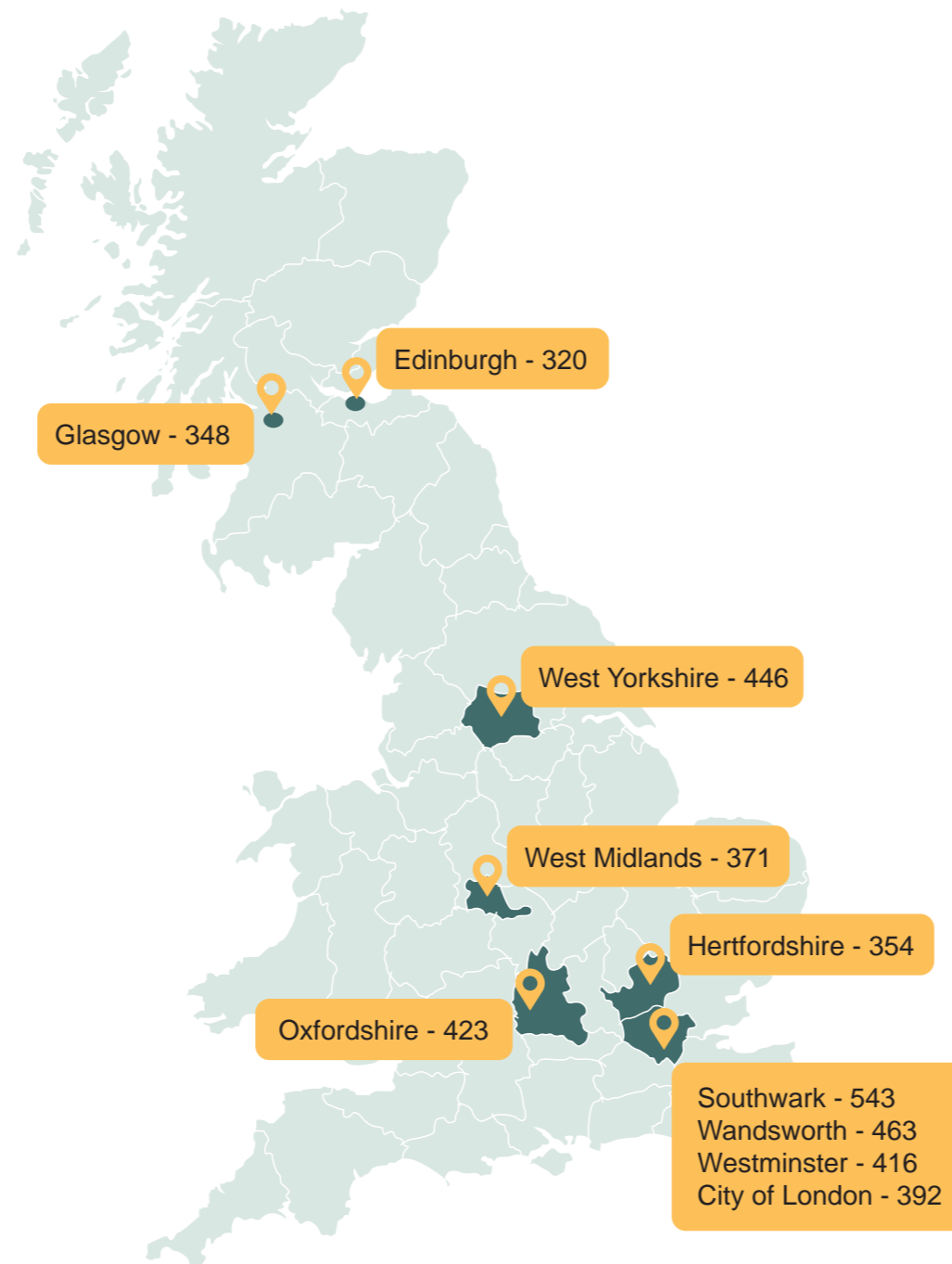
**Areas Visited:** 63 counties across the UK and boroughs of Greater London

**Individual Interviews:** 9,834

**Roles/Trades:** 72

**Nationalities:** 102

## Main Locations



## Specific Sectors (Top 3)

Construction	8284
House Building	697
Renewables	107

## Top 10 Nationalities

United Kingdom		4756
Romania		1818
India		367
Poland		244
Bulgaria		240
Moldova		234
Albania		213
Lithuania		198
Ireland		183
Ukraine		139

## Findings by Trade

What is your role within the company?	Percentage
Drylining/Fit out	17%
General Operative	10%
Plant operations (including slingers, banksmen and traffic marshals)	9%
Carpentry	8%
Electrical & Cabling	7%
Groundworks	7%
Plumbing & Pipework	6%
Steelwork including fixing & welding	5%
Brickwork	4%
Glazing & Cladding	3%



# Data Collection

To collect the data, Achilles' highly qualified auditors have worked closely with land and asset owners, main contractors and investors to identify work sites to survey. To avoid the possibility of collusion as much as possible, surveys are undertaken without prior announcement beyond specific arrangements that are made directly with trusted individuals employed by our partners and clients.

Each individual worker is selected at random and is interviewed confidentially, personal information that can identify a worker is not taken and audit teams work to capture the voice of as many individuals as possible. In some instances as many as 600 workers have been interviewed on larger construction sites.

Questioning is undertaken in a conversational manner and follows an agreed line of dialogue to capture specific information. Depending on the nature of the discussion, Auditors may deviate from the agreed topics within the methodology in order to capture specific information that

may be important. All workers that Achilles engages with are encouraged to raise any issues that they would like to be fed back, regardless of the nature of the point to be raised. This approach enables Achilles to identify key trends and profiles that can inform decision making whilst also providing workers the opportunity to voice concern or feedback opportunities for improvement without fear of reprisal.

Key topics covered during interviews include:

- Interviewee demographics e.g. age bracket and nationality
- Employment practices e.g. provision of a contract of employment and hours of work
- Modern slavery indicators e.g. freedom of movement, living conditions and travel arrangements
- EDI e.g. bullying and harassment
- Workplace safety e.g. access to safety equipment and safety training

# Findings of Concern

Within the interview data, there were several findings that present greater concern. Statistically, the number of findings is low, however, either individually or when combined with other factors they present the possibility of greater risk to individuals.

Several of the interviews that identified issues outlined above involved migrant workers with mixed levels of English language ability. Their immigration status, limited language ability and awareness of UK employment law presents a greater cause for concern given the likelihood that these individuals may not be aware that they are being exploited. Individuals may also not be aware of the employment rights afforded to them under United Kingdom law.

The following findings have been extracted from the data given their importance:

- **3** workers reported that they had been restricted from accessing or using their own mobile phone.
- **21** workers reported that they'd been required to pay forms of recruitment fee prior to their employment.
- **10** workers reported that they had not been paid directly into their own bank account.
- **111** workers reported that deductions that had been made post employment had not been explained to them. These deductions were in addition to taxes that they had expected.

# Further Findings

## Recruitment Fees Profile

Location	Tower Hamlets	Role	Plant Operative
Industry	Construction	Nationality	Indian

21 individuals responded that they had been required to pay a form of fee or deposit to their employer or agency provider prior to the commencement of work. Of those required to pay a fee, Indian nationals working in the Tower Hamlets area were identified as having reported the issue most frequently.

Given the immigration status of the individuals that had reported the issues and the associated fees, it was believed that workers may be at higher risk of being forced into forms of debt bondage.

## Conditions of Employment Profile

Location	City of London	Role	Drylining
Industry	Construction	Nationality	Moldovan

32% of individuals surveyed responded that employment arrangements had been provided verbally, via text or not formally received. Those involved in drylining and fitout in the construction industry were most likely to report that they had received informal advice on their working conditions. Data shows that self-employed Moldovan and Eritrean nationals in the City of London area were most likely to report that they had been provided with employment information verbally or via text message.

Terms and conditions of employment play a critical role in mitigating unfair employment practices. Workers who are unaware of their basic employment terms and their statutory rights may be at increased risk of being exploited, particularly individuals who may not be UK nationals or have recently commenced work in the UK.

## Wages Profile

Location	Dublin	Role	General Operative
Industry	Renewable Energy	Nationality	Brazilian

Workers in Dublin, undertaking work at a renewables project reported that in some instances wages had been paid that were below national minimum levels. General operatives were most likely to report that there had been an issue regarding levels of pay.

Most Achilles data shows that workers are paid above minimum wage requirements, in some instances this may include National Living and London Living Wage. However, due to the prevalence of administration fees, typically around £20, some workers had worked below minimum wage after deductions were calculated.

## Administration Fees Profile

Location	Tower Hamlets	Role	Plant Operative
Industry	Construction	Nationality	Republic of Ireland

The use of administration or payroll fees is consistent across the construction industry due to the nature of employment of many workers. The cost of fees and the method of deduction typically varies between a standard price or a percentage deduction. On average, workers reported that where deductions were taken the amount was typically £22 per week. Those involved in plant operations including signalling, most frequently reported that they had been required to pay administration fees for work. Worryingly, in some instances, workers were not made aware of the deductions until after they had received payment for their first week of work.

Section Five



Modern Slavery Awareness Profile

Location	Dublin	Role	Operative
Industry	Shipping	Nationality	Moldovan

Education and awareness play a crucial role in identifying and preventing exploitation or modern slavery. Since the introduction of the Ethical Site Survey, analysis has indicated that there is limited awareness on-site when workers have been asked about modern slavery awareness or training on what to look for. Moldovan operatives were found to be least likely to be aware of the signs of modern slavery with Dublin identified as the location with the highest number of respondents who demonstrated a lack of awareness.

To learn more about the indicators of modern slavery, our partners **Unseen** have created free to access information [here](#).

Time Away from Work Profile

Location	West Midlands	Role	Scaffolder
Industry	Construction	Nationality	Poland

Aside from excessive working hours presenting potential examples of exploitation, fatigued workers in dangerous working environments such as construction projects are statistically more at risk of injury. As a minimum, workers should expect to receive one day off in every seven and have adequate rest time built into the working day. Interview data indicates that over 100 workers have reported that they have not received adequate time away from work, most commonly these workers were located in the West Midlands and were from Ukraine or Poland.

Overtime Profile

Location	Tower Hamlets	Role	Operative
Industry	Construction	Nationality	Republic of Ireland

Linked to adequate rest periods, interview data also indicates that individuals from the Republic of Ireland were most likely to report that overtime was not voluntary. Over 100 workers reported that they were not free to refuse overtime. Most commonly, it was scaffolders who reported issues regarding the right to refuse overtime. The issue was most prevalent in the Tower Hamlets area of Greater London and the West Midlands.

Access to Free Safety Equipment Profile

Location	Brent	Role	Bricklayer
Industry	Housing	Nationality	Ukraine

UK legislation requires that individuals are provided with free Personal Protective Equipment (PPE). In 2022, PPE regulations were extended to cover ‘Limb (b)’ workers. This describes workers who have a more casual employment relationship and work under a contract for service.

Interview data has identified that both directly employed workers and ‘limb workers’ had been charged for PPE on many occasions. On average, 30% of those that were interviewed, that fell into the two employment brackets had reported that they had paid for some or all of their PPE. On some occasions, this decision was voluntary e.g. when a worker opted for their own safety boots as opposed to those provided by the company.

# Summary and Conclusion

Since the development of the Ethical Business Programme, Achilles, our clients and partners have been fortunate to gather a comprehensive data set directly from members of the construction industry workforce. Year-on-year analysis of the data since has highlighted common trends, particularly those relating to the provision of terms and conditions of employment, the use of payroll or administration fees, lack of right-to-work checks, and a lack of awareness of modern slavery indicators on site.

Whilst 2022 and 2023 data indicates some cause for optimism with slight improvements in increased modern slavery awareness and the use of formal contracts of employment, there continue to be significant challenges. Much of the interview data does not directly indicate the prevalence of modern slavery. However, several of the issues combined with a complicated supply chain structure which is supported by a migrant workforce present the possibility that individuals may find themselves subject to exploitation.

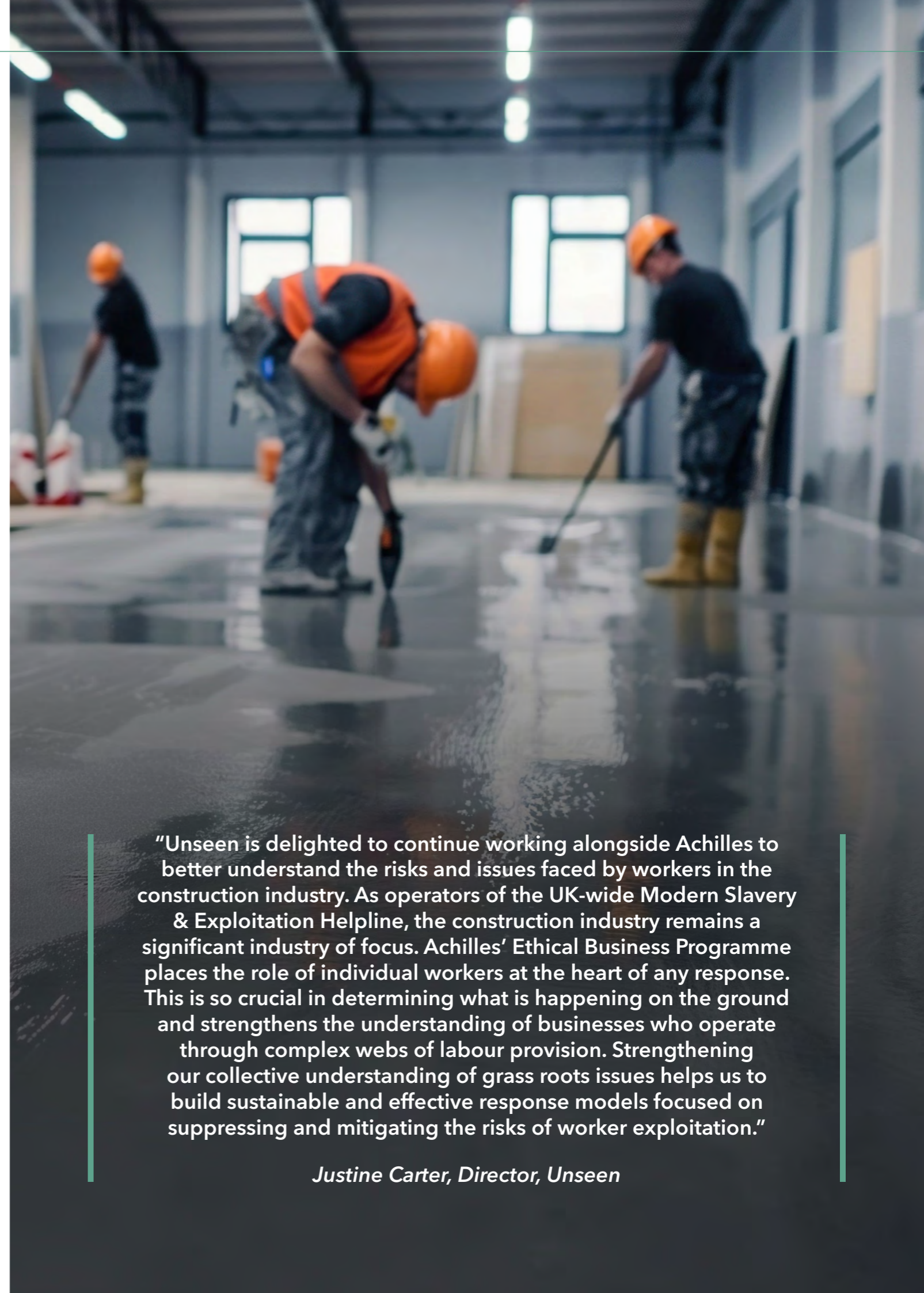
Recent, high-profile cases in other, more “stable” industries have demonstrated that workers can be exploited seemingly at will. The risk is therefore exacerbated when we consider the often transient and unstructured nature of site-related construction activities.

Ethical Site Surveys and the associated data have enabled companies in the

industry to form more intelligence-led decisions when prioritising their focus on high-risk areas within their projects or their supply chain. Through collaboration with businesses, government and non-government bodies, the findings and demographics data provide an opportunity to develop clearer strategies at corporate and policy level to ensure employment rights are upheld, as well as potentially prevent cases of modern slavery in the UK construction industry.

Many businesses that have used the data that Achilles has collected on their behalf have been able to focus on specific sub-contractors or suppliers and adapt their own training and induction processes to provide site workers with greater knowledge of the employment standards and arrangements they should expect.

With the overarching information contained within our report and the distribution of granular data to clients, government, and non-government organisations there is an opportunity to consider how workers are engaged by contractors, sub-contractors, agency providers and through umbrella companies. The sector can also consider methods to define a more standardised approach when communicating minimum employment arrangements that individuals can expect to receive. Businesses can also further develop their on-site guidance on spotting the signs of exploitation or modern slavery to raise awareness at site level.



**“Unseen is delighted to continue working alongside Achilles to better understand the risks and issues faced by workers in the construction industry. As operators of the UK-wide Modern Slavery & Exploitation Helpline, the construction industry remains a significant industry of focus. Achilles’ Ethical Business Programme places the role of individual workers at the heart of any response. This is so crucial in determining what is happening on the ground and strengthens the understanding of businesses who operate through complex webs of labour provision. Strengthening our collective understanding of grass roots issues helps us to build sustainable and effective response models focused on suppressing and mitigating the risks of worker exploitation.”**

*Justine Carter, Director, Unseen*

500+

People



Expert global team including validators and auditors provide end-to-end supply chain management and client support in more than 20 languages.

22

Countries



Global reach and local presence ensures understanding of local regulations, language and culture to enable superior supply chain risk management.

6700+

Audits



Achilles unique desk and on-site audit and worker interview capability supports rigorous supply chain due diligence requirements and goals.

#1

Global Platform



The MyAchilles platform is designed to collect, validate and manage complex supply chain data and simplify supply chain management and reporting.

# About Achilles

Since our story began more than 30 years ago, Achilles' goal has been to build a more sustainable, cleaner, safer and fairer world.

Using our global technology platform and protocols based on our unrivalled ESG knowledge and experience, our highly qualified validators and auditors perform due diligence and provide deep insights that ensure the organisations can confidentially manage supply chain risk and fully meet ESG, sustainability, human rights and health and safety obligations.

## Comprehensive Supply Chain Risk Management

Achilles provides a complete supply chain risk solution. We are world-leading experts in procurement and supply chain regulation, health and safety, financial and cyber risk and sustainability and carbon management.

## Unrivalled Supply Chain Transparency

Achilles rigorous validation of supplier information draws from multiple sources

to create a complete picture that uniquely also includes in-person audits and worker interviews to provide unrivalled ESG and supply chain transparency.

## Effective Carbon Reduction

Achilles provides the only accredited Carbon Reduction programme in Europe to independently measure and reduce carbon emissions and meet all stakeholder reporting requirements. In 2022, Achilles saved organisations 97,000 tonnes of CO2 – equivalent to the planting of 4.8 million trees.

## The Achilles Difference

Achilles is the only ESG specialist to offer truly in-depth assessments, including on-site audits, to provide the level of supply chain transparency and confidence truly required by today's most environmentally conscious and ethical organisations.

## Learn More

To learn more about Achilles and how you can harness our capabilities within your own organisation, contact us [here](#).



[www.achilles.com](http://www.achilles.com)

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Global Risk Management