



# ABP UK Modern Slavery Statement.

September 2023

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ABP UK – Modern Slavery Statement 2023

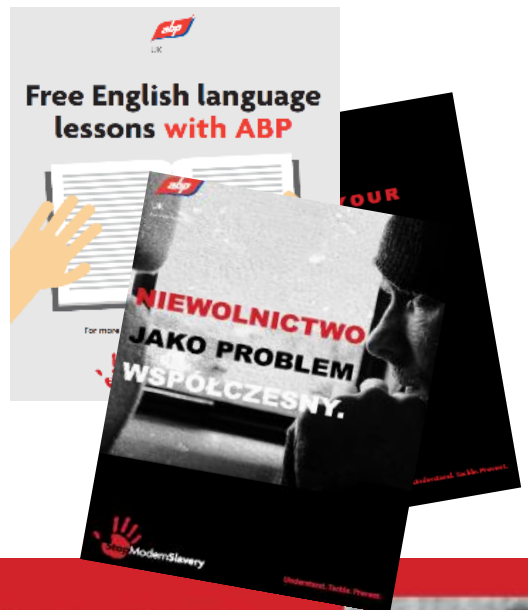


# Introduction

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015. It sets out the steps taken by ABP UK during the year ending 31 March 2023 to prevent modern slavery and human trafficking in its business operations and supply chains.

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## SPOT THE SIGNS.

Modern Slavery takes all forms. It's an issue that affects people of all ages, genders and races. Victims may show any number of the following signs:

- ↳ **DEPENDENCE**

They may depend solely on their employer or gang leader, be without authentic ID, or travel exclusively with colleagues.
- ↳ **BEHAVIOUR**

They may suffer from a lack of social interaction, be distrustful of the authorities, or feel they're obliged to work without pay.
- ↳ **ACCOMMODATION**

They could be unaware of their address, unable to give out contact details, or live in substandard accommodation with colleagues.
- ↳ **FINANCES**

They may have limited or no access to their earnings, or be forced into applying for benefits, credit agreements and loans.
- ↳ **APPEARANCE**

They may have unexplained injuries that appear to be the result of assault, or have no choice but to wear the same clothes every day.

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# 1. About ABP UK

ABP has been providing quality meat to thousands of customers for over sixty years. From humble beginnings in the Republic of Ireland, the ABP Food Group has developed a reputation for quality, efficiency and innovation. These values run throughout the portfolio and have been vital in making sure that we are able to deliver in line with customer and consumer expectations.

ABP UK is a division of the ABP Food Group which, for the last 35 years has grown to become one of the world's leading food production companies. The UK division proudly employs over 6,000 people across 17 operating sites (13 primary processing, 4 retail packing and 2 frozen convenience foods sites) in Northern Ireland, Scotland, and England, with its UK support office in Birmingham. The company structure consists of a central core including Finance, IT, Commercial, Technical, and HR who support the Production Operation at each site.

ABP has a range of suppliers, from office milk deliveries for tea and coffee to packaging and labels for our products to be displayed in supermarkets. Our most significant suppliers are those who provide our protein ingredients, such as beef and lamb, other edible ingredients and our labour providers who supply temporary and permanent recruitment solutions. ABP do not own the farms that rear our livestock or the lorries that dispatch our products, but we work with the suppliers that provide these and other services such as security and storage to make sure they understand our policies and supplier requirements. We procure livestock from thousands of farmers across the UK and we sell our products to retail supermarkets, food service, manufacturing and wholesale distribution markets around the world.

## 2. Our Policies in Practice

ABP operates several policies across its businesses to combat modern slavery, which are regularly reviewed and developed by senior management.

The policies are based on the following commitments and standards:

- UN Guiding Principles on Business and Human Rights
- ETI Base Code
- GLAA Licencing Standards
- Stronger Together Guidance
- Responsible Recruitment Toolkit
- Retailer Codes of Practice

In the Supply chain the following policies apply:

- **GLAA licencing** standards detailing the licencing requirements.
- **Customer codes of practice**, where customers set ethical standards for supply chains.
- **ETI Base Code**, setting labour standards
- **The Employer Pays Principle**, ensuring no worker bears the cost of recruitment.

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Internal policies are:

- ABP UK Modern Slavery Policy
- Ethical Trading Statement
- Human Rights Policy
- Guidance for Farms Policy
- Responsible Recruitment Policy
- Accommodation Standards Policy
- Whistle Blowing Policy for confidential reporting by workers and independent investigation of concerns
- Anti Bribery and Corruption Policy
- Young Workers Policy to prevent risks to young workers.
- Our **Employee Handbook** emphasises our values and outlines the rights and responsibilities for our employees.
- We have a **zero-tolerance policy** on discrimination, harassment, bullying and victimisation.

## 3. Identifying Risk

### Risk

The risk of modern slavery and exploitation within the food supply chain is high, and we recognise our duty of care towards our colleagues to mitigate these risks. Only by identifying these risks can we implement measures to reduce them. Our key risk areas include:

- Labour supply, both locally and internationally, across our sites;
- The farms that supply livestock to our abattoirs;
- Any supplier, particularly beyond the first tier where we do not have direct sight of processes and procedures in respect to the supply of products and ingredients.

### Mitigation

There are formal industry standard risk assessments used by our business and supply chains in the context of:

- SEDEX ethical risk assessments at every one of our UK sites;
- SEDEX engagement with our non-protein supply base;
- Customer specific ethical audits and engagement
- Supplier verification process;
- Labour Supply Management process;
- Our award-winning worker interview & colleague welfare programme.

Ensuring that all our colleagues are aware of the risks of modern slavery and exploitation is our first commitment to reducing risk. By providing information on how to **“SPOT THE SIGNS”** to all staff, everyone is equipped to recognise issues and understand how to escalate them. Our line managers and HR colleagues are provided with robust training on exploitation within supply chains to ensure that all our recruitment and onboarding activity is conducted in line with our standards.

We work closely with our labour supply chain to provide training, support and guidance where required to enable them to meet our standards.

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Our labour supply chain spans several countries and is identified as one of our main supply chain risks. We conduct recruitment directly and through our partner labour agencies, both within the UK and overseas. We recognise that the risks of forced labour, child labour and human trafficking across international borders are present in some of our source countries. New recruitment opportunities create new risk to our colleagues and our business, and we will continue to implement best practice, improve our procedures and ensure our labour partners uphold our commitments in all aspects of their business.

We will ensure we are prepared for any new risks that could develop as we continue to recruit further afield in a changing global landscape, and we will only embark and sustain relationships with organisations that can commit to reaching our standards.

## 4. Tackling Risk

We continue to see significant challenges in the labour market, due to the end of free movement and an increase in recruitment activity in different geographic locations within our supply chains. These complex and developing threats shape our current and future actions and we are equipped to address them.

ABP continues to lead the way in combatting and mitigating the risk of modern slavery and exploitation in its operation. In our sixth year of reporting, ABP commits to drive innovation, resilience and education on the issue as the threats of modern slavery evolve.

We subscribe to the **MINIMUM** expected measures which include:

- Maintaining A/B membership of SEDEX and active participation in working groups, and all sites subject to SMETA auditing;
- Active member of the GLAA User Group;
- A risk based Ethical Action Plan;
- Structured internal ethical audits and worker interviews;
- Multi-lingual whistle blowing phone lines;
- Stronger Together Business Partners
- Responsible Recruitment Toolkit users

We also go a **STEP FURTHER** to include:

- Partnership with ex GLAA consultants used for all internal site and external supplier ethical audits;
- Implementation of a multi-lingual Employee Assistance Programme with additional help line options;
- Worker's voice engagement via various feedback mechanisms;
- Mandatory internal training delivery by appointed Modern Slavery partners;
- An Ethics Dashboard to monitor key indicators of risk, such as risk heatmapping, site turnover, temporary labour usages, working hours, workplace accidents, language proficiency and attendance at classes.

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For our **SUPPLY CHAIN**, we are committed to ensuring that:

- Our non-livestock supply base are connected via SEDEX and completing the risk assessments;
- Our labour partners are committed to our ethical standards through our supply terms and can actively demonstrate this at service review meetings, routine audits and via worker interviews
- Our labour partners domestically and globally are committed to the Employer Pays Principle and understand that recruitment is a cost to be borne by business and not the worker.

## 5. Training & Awareness

ABP remains committed to raising awareness of the issue of Modern Slavery via the following learning opportunities:

- Modern Slavery Awareness training for all colleagues during on-boarding & induction;
- More in depth Modern Slavery Awareness, Responsible Recruitment and Supply Chain Transparency training for all line mangers, HR colleagues, welfare marshals and employee forum representatives;
- Multi-lingual Modern Slavery Awareness materials, including posters, flyers and business cards
- Supplier training & support at on boarding.

## 6. Who we Work with

ABP partner with external consultants who possess extensive expertise in this area, to build our own capability and understanding to maintain our focus on intelligence gathering and detection of any concerning practices and trends arising in our business or the wider supply chain.

- Former experienced GLAA enforcement and public sector enforcement such as police officers and DWP investigators;
- Industry peers who help build awareness and share best practice and assist other organisations to adopt good practices to mitigate the risk in the UK as a whole;
- ABP maintain an open dialogue with and provide support to the GLAA;
- ABP has dedicated multi-lingual whistleblow line which enables colleagues to choose their native language to voice any concerns;
- ABP participate in various Human Rights Working Groups and undergo regular training with organisations such as the ETI, ALP, CIPD, RRT and SEDEX;
- ABP partner with and develop Labour Providers enrolled on our preferred supplier list to ensure they have processes and systems aligned with our own.

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# 7. Key Performance Measures

## Aims

Our Modern Slavery agenda is at the front of our People Strategy, and our established aims and measurable KPI's are incorporated in all site and business objectives. These are:

- To embed ABP UK values and policy relating to tackling the threat of modern slavery and exploitation across the business;
- To take a pro-active and visible approach to mitigate the threat, risk and harm of modern slavery and exploitation;
- To maintain a framework of risk assessment, compliance and accountability to identify and maintain best practice;
- To support the retention and wellbeing of employees through improving the working and social environment via regular worker interviews, welfare checks and 'worker's voice' mechanisms;
- Improved levels of engagement via a range of channels leading to improved productivity.

## Key Performance Indicators

And in doing so implementing an MS strategy with specific key performance indicators to measure progress by for the next 12 months:

- Risk based Modern Slavery Intelligence model & network for each geographical region in the division which allows a deeper dive into the existing worker interview and welfare programme;
- 100% awareness of the risk of Modern Slavery & Exploitation;
- Report on % of information reports submitted from external bodies
- Refresher Programme Training and internal Modern Slavery and Ethics conferences and roadshows to showcase the organisation commitment to this agenda;
- Reduction of turnover of direct and indirect employees;
- Improvement of attraction & retention rates.

# 8. Looking Ahead

ABP is fully committed to continuous improvement across all areas of the business and applies this to its approach to reducing the risk of modern slavery and exploitation.

ABP will never deem this matter to be fully closed, as continued labour shortages and changing recruitment practices present new risks, challenges and uncertainty. As labour shortages increase, the cost-of-living crisis grips and supply chain complexities present themselves, it is critical to ensure ABP and the wider industry fully commit to improving standards, implementing best practice and supporting the welfare and rights of all colleagues.

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ABP recently commenced discussions with the organisation FiftyEight to explore expansion and wider adoption of the JustGoodWork app for skilled workers coming to work in the UK. This provides workers with unbiased, accessible up to date information on the recruitment process, their job role and living and working in the UK.

## 9. Conclusion

The Modern Slavery agenda at ABP UK is far reaching and involves a significant investment of both time and money. The challenges within the last 12 months continue to grow in complexity, with the wider reach of our recruitment. The post-Brexit and post-pandemic landscape has had a far-reaching impact on labour availability in the sector, and accessing labour only becomes more complex when utilising visa schemes or recruiting in different locations.

ABP continue to work closely with the GLAA sharing relevant intelligence through our close network. Over the last 12 months we have investigated concerns around labour providers making spurious applications on behalf of candidates for status under the European Union Settlement Scheme, as well as potential allegations of document holding by individuals outside our authorised recruitment channels. The concerns were ultimately unfounded and there was no risk to any ABP colleague, but all concerns were duly investigated, and colleague welfare remained at the forefront of our approach. ABP continues to be aware of potential unlicensed labour providers acting in different locations and flags to the GLAA as appropriate.

The Central HR Team work closely with site operations to provide a strong support focus on all labour initiatives across the business. All accommodation provided by ABP to colleagues is rigorously checked and maintained in accordance with industry standards, and we work with all labour providers on a tightly managed preferred supplier list to ensure that recruitment is sustainably sourced and managed.

If agency labour provider standards are not fully aligned to ABP's own, it partners with the agencies who are willing and able to drive improvements that benefit colleagues.

In accordance with Section 54 of the Modern Slavery Act 2015, this statement has been approved by the ABP UK Board of Directors.

**Sarah-Jane Fulton**  
**HR Director**

**September 2023**



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