

# Eliminating modern slavery from projects

---



---

## Authors

Prof. Naomi Brookes, WMG, University of Warwick  
Prof. Jacqui Glass, The Bartlett School, UCL  
Dr Armando Castro, The Bartlett School, UCL  
Prof. Giorgio Locatelli, The School of Civil Engineering, University of Leeds  
Dr Gloria Oliomogbe, University of Leeds

## APM research sponsor

Daniel Nicholls, APM research manager

## Acknowledgements

The authors would like to thank the Delphi participants for the generous way in which they allocated their time to this research. Without their interest, this investigation into such an important area would not have happened.

The team would also like to thank APM for the support and particularly Daniel Nicholls, whose advice was invaluable.

## Executive summary

Modern slavery involves the **recruitment, movement, harbouring or receiving of people through any means for the purpose of exploitation**. It is an extensive problem and one that causes immense human suffering. International Labour Organization figures suggest that there are 24 million victims of modern slavery or forced labour around the world at any one time, with a substantial proportion of these working on project-related activities.

Modern slavery causes **reputational risk** to organisations from the perspective of customers and investors. In the UK, it is now subject to specific legislation. The damage and costs of legal action and compensation to victims of modern slavery can be crippling. Projects are particularly susceptible to modern slavery as they have complex flows of materials and labour that need to be constantly reinvented for each unique project context.

The **Association of Project Management** sponsored a research investigation involving the **University of Warwick**, the **University of Leeds** and **University College London** to understand how project practices need to change to eliminate modern slavery. In order to answer this question, the research team undertook a Delphi exercise with experts representing **project practitioners** (eg. from organisations such as HS2 and Sir Robert McAlpine), **NGOs** (eg. The Bingham Centre and The Institute for Human Rights and Business) and **professional membership organisations** (eg. The International Association for Cost and Contract Management and the Royal Institute of British Architects), as well as **academic researchers and individual experts**.

The investigation finds that the key to eliminating modern slavery is to give individuals working on projects the competence and confidence to spot modern slavery and to know what to do when this occurs. This requires support at an organisational, sectoral and legislative level. This report details this support.

### The investigation recommends:

- **For academics:** Follow-on work looking at application frameworks and further exploring the role of multi-stakeholder initiatives for eliminating modern slavery.
- **For project practitioners:** Cost-effective solutions for eliminating modern slavery that 'piggy-back' on existing project practice and project governance.
- **For professional membership organisations:** Recognition of their key role in seeking to eliminate modern slavery in projects and promoting proposals for doing that at organisational and individual levels.

## Contents

Authors	2	3.4 Delphi Stage 2: The Delphi event	16
Executive summary	3	3.5 Delphi Stage 3: Feedback on the event findings and implications for action	16
1 Introduction	5	4 Findings	17
1.1 The APM Research Fund	5	4.1 Initial questionnaire findings	17
1.2 Aim and structure of this report	5	4.2 Delphi exercise and feedback findings	18
2 Context	6	4.3 Implications of findings for action	22
2.1 The extent of modern slavery	6	5 Recommendations	25
2.2 Formal definitions of modern slavery	7	5.1 Recommendations for researchers	25
2.3 What are the drivers of modern slavery?	8	5.2 Recommendations for project practitioners	26
2.4 How can modern slavery be eliminated?	10	5.3 Recommendations for professional membership organisations	27
2.5 Modern slavery in the context of projects	12	References	28
3 Investigation approach	14	Appendices	31
3.1 Investigation aim and methodology	14	Appendix 1 – Survey questionnaire	31
3.2 Identifying the Delphi participants	15	Appendix 2 – Event running order	31
3.3 Delphi Stage 1: The questionnaire	16		

# 1. Introduction

## 1.1 The APM Research Fund

The Association for Project Management (APM) is the only chartered body for the project profession, with more than 30,000 individual members and 500 organisations participating in our Corporate Partnership Programme.

As an educational charity, we are committed to developing and promoting the value of project management in order to deliver improved project outcomes for the benefit of society.

APM's research programme aims to advance new and existing knowledge in the delivery of projects, programmes and portfolios. The programme has a broad range of research initiatives and activities that are open for individuals and organisations to engage with at any time. APM's Research Fund was established within the research programme to provide funding for small-scale research projects or to provide seed funding for larger research projects. The 'Eliminating Modern Slavery in Projects' investigation was supported by this initiative.

The investigation was conducted over a period of five months by the team described in Table 1.

Name	University
Prof. Naomi Brookes (principal investigator)	University of Warwick
Prof. Jacqui Glass	University College London
Dr Armando Castro	University College London
Prof. Giorgio Locatelli	University of Leeds
Dr Gloria Oliomogbe	University of Leeds

*Table 1: The investigation team*

## 1.2 Aim and structure of this report

The aim of this report is to provide a complete record of the investigation to APM in a systematic and scholarly style. It is structured to offer context for the investigation, derived from both practitioner experience and academic literature. It provides a description of the research approach used in order to frame the knowledge produced by the investigation. It details the findings and interprets those findings as recommendations for academic researchers, project practitioners and professional membership organisations.

## 2. Context

### 2.1 The extent of modern slavery

Modern slavery is an extensive problem. It involves and affects not only the victims but also brand owners, buyers, suppliers, non-governmental organisations (NGOs), the media, governments and wider society.

International Labour Organization (ILO) figures suggest that there are 24 million victims of forced labour around the world at any one time, with construction accounting for 18 per cent of these. Current estimates of the number of modern slaves in the UK range from 10,000 to 13,000 (Bales et al, 2015). Modern slavery has become a topic of great public concern and is becoming increasingly newsworthy. This highlights the reputational damage that organisations may be exposed to if they are found to be harbouring slaves or if there is slavery in any part of their supply chain. This damage and the costs of legal action and compensation to victims could be crippling for an organisation. These factors, combined with increasing investor concern, provide cogent rationales for the elimination of modern slavery.

Three articles spanning November 2019 to January 2020 show the breadth of the media coverage and the diverse manifestations of modern slavery across the globe.

**CASE ONE:** Amelia Gentleman of *The Guardian* reported on 21 January 2020 the true cost of a £10 manicure. Vulnerable young Vietnamese people are being trafficked to work in cut-price nail bars, with the lack of spoken English among the staff serving as a warning flag for further investigation. Operating in plain sight, nail bars might seem unlikely fronts for modern slavery; after all, it is hard to imagine such an innocuous service being linked with such serious crimes. Kevin Hyland, the UK's first anti-slavery commissioner, who stepped down in 2018, says people remain confused about the presence of exploitation on the high street because they expect trafficking to be hidden. "People see the shops – they've been there for years, police cars drive past them, the local authority collects their rubbish – so they assume they can't be one of the places where modern slavery happens." Familiarity can also add a sense of respectability to the premises. "The longer the shop has been there, the more accepted it is," he says.

**CASE TWO:** An undercover investigation by BBC Three and Zak Garner-Purkis of *Construction News* painted a picture that is difficult to accept as a feature of modern Britain. Garner-Purkis's report from 19 December 2019 showed that modern slavery hides in plain sight, with construction projects getting built using illegal suppliers because the industry is desperate for labour and often faces tight budgets. A gangmaster assured the undercover agent posing as an unscrupulous builder that the workers were under his control. A price of £70 a day for 15 hours' work is agreed, with men being paid £4.50 an hour to work seven days a week with no breaks. Organised crime groups (OCGs) frequent the places where casual workers are recruited, and a black market exists for construction labour, particularly when it comes to agreeing bigger deals for more extensive work. Unsurprisingly, OCG members and the victims of modern slavery are often indistinguishable in appearance. The criminal gangs that traffic people cultivate a climate of a fear, exploiting familial and geographic links in order to hide their actions under the guise of legitimate connections to their victims. The fear instilled in the victim, mixed with their often illegal immigration status, empowers the criminal gangs. This also provides the basis for the central defence typically argued in modern slavery cases – that the victims were in fact voluntary participants and had a legitimate business relationship with the gangmasters. The difficulty in policing this market means that it's currently easier to buy slave labour than it is to block it.

---

The Modern Slavery Act mandates that organisations operating in the UK with a turnover of £36m or more per annum must issue a statement on how they are addressing modern slavery

**CASE THREE:** In a *Guardian* article on 22 November 2019, Lauren Zanolli reported that Honduran construction worker Delmer Joel Ramírez Palma had been arrested by US immigration officials in New Orleans. Ramírez Palma had previously warned managers about the safety issues which resulted in the deadly Hard Rock Hotel collapse on a busy downtown intersection on 12 October 2019 – a tragic incident that killed three and injured dozens, including Ramírez Palma. According to Mary Yanik, senior staff attorney at the New Orleans Workers' Center for Racial Justice: "The timing is highly suspicious... and the circumstances of the arrest are extraordinarily suspicious." There was no direct evidence tying Ramírez Palma's arrest to his employer, but the case highlights the unique risks that undocumented immigrants face on project sites, advocates said.

The UK's Modern Slavery Act was enacted in 2015. It concerns slavery, servitude, forced or compulsory labour and human trafficking, and it provides for the protection of victims. It also makes provision for an independent anti-slavery commissioner and for connected purposes. The Act mandates that organisations operating in the UK with a turnover of £36m or more per annum must issue a statement on how they are addressing modern slavery within their business (Gadd and Broad, 2018). The business coverage and the inclusion of the global supply chain give the Act an international reach to wherever businesses are sourcing from (Voss et al, 2019). The advent of the Act has increased awareness of modern slavery in the UK and stimulated demand for training, certification and awareness programmes. However, there is still concern about the level of non-compliance and organisations only paying lip service to the Act.

## 2.2 Formal definitions of modern slavery

There are a number of definitions of modern slavery:

*"Modern slavery is that condition in which one or more individuals or organizations exercise complete control and possession of a person's body, labor, capabilities and movement through the overt or threatened use of violence or other forms of coercion. It lies at the extreme end of the spectrum of servitude and includes forced labor, slavery, trafficking and smuggling, along with what is termed 'abusive migration'."* (Patterson and Zhuo, 2018)

*"Modern slavery is used as an umbrella term to capture different forms of exploitation, including but not limited to various forms of labor exploitation, such as forced labor... but it can also include human trafficking, forced marriage and the removal of organs."* (Voss et al, 2019)

Modern slavery has five common features:

1. Victims are forced to work through threat.
2. Victims are controlled by an 'employer', typically through mental, physical or threatened abuse.
3. Victims are dehumanised and treated as a commodity.
4. Victims are physically constrained or restricted in freedom.
5. Victims are subject to economic exploitation through underpayment.

(Crane, 2013)

These alternative framings illustrate that, despite the term 'modern slavery' increasingly circulating in policy, legislative, and civil society arenas, there is no widely agreed definition of modern slavery, and the term is not defined in any international instrument (Voss et al, 2019). The lack of a clear definition is echoed by Patterson and Zhuo (2018), who note a general agreement that the study of trafficking and modern slavery is beset by serious definitional problems. These problems challenge the validity and compatibility of empirical findings. Patterson and Zhuo critique the most authoritative body on the subject, the ILO, on the change from the use of the term 'forced labour' or 'servitude' to the term 'modern slavery' (ILO, 2017). While acknowledging the need for change so as to include other accepted forms of exploitation – such as forced marriages, for example – Patterson and Zhuo were of the view that 'modern slavery' dilutes the term 'slavery' by making it a subcategory of itself.

Crane (2013) noted the ambiguities around the term 'modern slavery', deeming it to be inadequately broad to be of practical use and often misunderstood by workers in exploitative conditions. Crane was of the view that the term modern slavery could distract from the objectives of anti-slavery legislation in the UK and overseas.

Chuang (2015) concurs that definitional difficulties cause problems in tackling modern slavery. She points out that flexibilities in definitions run counter to the legal principle that crimes and punishments should be clearly defined in law, thus prejudicing the rights of the accused. She also argues that the term 'slavery' is itself problematic. By implying that there are specific 'slavers', it absolves governments of their responsibility to dismantle a context where slavery can thrive, especially in terms of maintaining strict border controls that force workers into the arms of illegal traffickers to bypass them. She states:

*"This approach absolves – behind a humanitarian agenda – the state for its role in creating the structures that permit, if not encourage, coercive exploitation of workers, especially migrants. Any commitment to addressing the structural contributors to the problem thus becomes extraneous to the anti-slavery project. States need not, for example, consider the relationship between tightened border controls and the growth in the market for clandestine migration services."*

Despite the problems associated with defining modern slavery, any study must define the parameters of its scope. This investigation has adopted the UK government's definition of modern slavery, as refined by Public Health England in its work in this area:

*"The recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation."* (PHE 2019)

## 2.3 What are the drivers of modern slavery?

**Key drivers of modern slavery are:**

- globalisation;
- supply chain complexity;
- informal employment practices; and
- government ambivalence.

**Globalisation:** Arguably the greatest driver of modern slavery is the spread of globalisation. Indeed, the International Labour Organization has referred to forced labour as "the underside of globalization" (ILO, 2008). Inherent within globalisation is a search by organisations for cheaper goods and labour through global sourcing practices. Gold et al (2015) draw attention to the exploitative supply chains behind raw and finished goods and commodities due to organisations seeking comparative cost advantages. Consequently, slave-made commodities are inseparably mixed up with commodities of other provenance as they head towards the consumer – at the exporter or wholesaler level, for example. Furthermore, the drive for cheaper commodities leads to organisations neglecting their ethical responsibilities. Crane (2013) argues that slavery is in effect an attempt to underprice key resources through illegitimate means. Businesses are focused on cost-reduction strategies, and not workers' welfare, which inherently creates opportunities for exploitation and modern slavery to occur. The driving force of globalisation is underpinned by other, more contextual drivers that also lead to the adoption of modern slavery. Patterson and Zhuo (2018), as well as identifying globalisation, also highlight the impact of domestic economic changes, sociological developments, politico-legal changes, personal factors and the growth of gender imbalance due to a combination of medical and political changes.

**Supply chain complexity:** Linked to globalisation is the increasing complexity of supply chains and the potential for modern slavery to be hidden within these. Voss et al (2019) point out that modern slavery and labour exploitation in the fashion and textile sectors, for example, arise from the fragmented nature of their supply chains, with global supply chains being organised across multiple tiers around the world. Brand owners tend to work closely with their first-tier suppliers, but other tiers of the supply chain are often not known to brands and exist outside their immediate scope of influence. Voss et al argue the following:

"The opaque structure of the supply chain enables suppliers to outsource production to other businesses without an awareness of the ultimate source of their product and without assuming responsibility for due diligence along the entirety of the supply network, which creates conditions that support modern slavery. Supply chains vary in their risk or exposure to modern slavery. Even when businesses are committed to the elimination of modern slavery within their supply chains, the identification and monitoring of all their suppliers and sub-tier suppliers are near-impossible tasks in global supply networks. The commercial relationship in supply chains usually does not stretch further than one tier in their supply-chain management approaches. Most businesses will naturally focus on their larger, strategic suppliers which are commercially the most important to them, whereas most of the modern slavery risk may be in peripheral, hidden and informal actors in the supply chain or in areas where modern slavery is structurally embedded in the business model and culturally accepted."

New (2015) recommends that all suppliers should be treated equally from a modern slavery perspective and that this should include both suppliers of workers (labour flows) and suppliers of materials and sub-assemblies (material flows).

**Informal employment practices:** Environments in which modern slavery flourishes also tend to be those where employment practices are at best informal and are sometimes outright criminal. Crane (2013) highlights informality in employment practices and the criminalisation of certain types of work as creators of environments where exploitation thrive, which may be supported by governments that create and/or maintain highly exploitative labour conditions, enabling the trafficking of people. It was found that informal recruitment practices that lack transparency may encourage the use of exploitative labour.

**Government ambivalence:** Although governments often pay lip service to eliminating modern slavery, their reluctance to act remains a powerful force in its survival. Citing the 2013 Rana Plaza collapse in Bangladesh as an example, Blitz and Simic (2019) question the sincerity of governments when it comes to eliminating modern slavery. Highlighting the gap between formal expressions of commitment and practice, they attribute the gap to the uneven implementation of national laws and watered-down commitments by national governments. Research by Deshingkar (2019) has also highlighted the "nexus between policy, culture, brokerage and poverty" that belies the complicity of governments in maintaining controls on labour flows across national boundaries, which ultimately leads to slavery. Pinheiro et al (2019) state that:

---

Many workers do not consider their conditions sufficiently appalling to warrant action, with some attributing their situation to bad luck or the function of structural hierarchies which they must endure

*"While slavery has been outlawed globally in national legal systems, the degree to which these regulatory frameworks are implemented effectively or have been established to give the impression of governmental efforts to end slavery is questionable."*

Other factors that influence the growth of modern slavery include a cultural acceptance of slavery and the difficulty of detecting it. Blitz and Simic (2019) note that many workers do not consider their conditions sufficiently appalling to warrant action, with some attributing their situation to bad luck or the function of structural hierarchies which they must endure. Such socio-culturally embedded understandings may also undermine the effectiveness of anti-slavery efforts. New (2015) also states that one of the key issues here is forced labour's potential invisibility and the difficulty of detecting it.

*"The firm is likely to encounter very significant levels of active deceit and denial from anyone involved in forced labour, and so normal use of auditing and certification mechanisms is likely to be problematic. Consequently, the types of approach used for some areas of supply chain monitoring (questionnaires, pre-notified audit visits) may not be suitable – or, indeed, pointless – for the investigation of forced labour."*

New (2015)

## **2.4 How can modern slavery be eliminated?**

### **The complexity inherent in eliminating modern slavery**

The complex interplay between the various drivers of modern slavery make its elimination very difficult. Cockayne (2016) states:

*"The economic drivers of slavery intersect with political and social vulnerabilities; susceptibility to slavery is, unsurprisingly, correlated with socio-political marginalization and disenfranchisement. The demand for cheap labour intersects with individual vulnerability, often caused by poverty, domestic discrimination, conflict and displacement. Even those forms of slavery that seem particular to conflict, such as the forced recruitment and use of children, seem to follow a similar cost-saving and industrial logic. Arguably, understanding the points of intersection presents an invitation for further social scientific investigation."*

Mechanisms for dealing with modern slavery will need to take a holistic perspective. A multi-faceted approach needs to include economic, social, cultural and legal considerations. The approach must also be scalable and contextual. It will require improved victim identification and co-operation with businesses, employers, workers and civil society. Given the difficulty in tackling the problem, the first step may be to undertake some form of context-specific mapping. This may be of existing legislation to identify potential areas of address, but it should also involve identifying taxonomies and typologies of victims and perpetrators (Blitz and Simic, 2019). Gold et al (2015) also suggest the mapping of supply chains to highlight areas of involvement with modern slavery (although they admit that, given how hard it is to detect modern slavery, this may be difficult).

### **Structural solutions**

At an organisational level, the ILO (2008) has advocated a range of structural solutions that could be employed to inhibit modern slavery, including:

- developing a clear policy on forced labour and slavery;
- training auditors and compliance officers;
- establishing measures to monitor suppliers and subcontractors; and
- extending monitoring to contract agencies.

However, Crane's (2013) work reveals the limited effectiveness of codes of conduct and other such initiatives, as the slave operators play a fundamental role in responding to and shaping these external factors. He suggests that co-operative certification programmes such as Fairtrade (which ensures that producers in developing countries get a fair price for their products) or Rugmark (which ensures that carpets are made without the use of child labour, including forced and slave labour) may play a more successful role by instituting a form of privatised, non-state, market-driven governance.

### Increasing public pressure

One of the most fruitful avenues for eliminating modern slavery comes from the increasing pressure being exerted by public interest in ethical and environmental issues. Katenbayeva et al (2016) highlight the role that public pressure plays in driving traceability in supply chains. The decision to invest in a slavery-free supply chain is based on the risks of litigation and reputational damage due to this public pressure. Gold et al (2015) point out that the use of slave labour beyond first-tier suppliers presents legal challenges for organisations. This pressure leads to a notion of supply chain transparency. New (2015) highlights how this could force firms to provide greater levels of detail about the exact provenance of their products, and to make specific data available as a public good.

### Developing new legislation

Although legislation is often viewed as a panacea for eliminating modern slavery, caution must be exercised with respect to its efficacy. The UK's Modern Slavery Act provides an interesting example. Blitz and Simic (2019) explain that in January 2019, a distinguished panel of parliamentarians published a damning report on the application of the Modern Slavery Act. This report evaluated the transparency of supply chain provisions and laid out some common criticisms of modern slavery. One recurring issue was the design and operation of the UK's modern slavery legislation. The report authors found that there was uncertainty over which companies were covered by the legislation and condemned the level of reporting by firms as inadequate. They also pointed to poor compliance and identified a major weakness in the legislation, since large sections of the economy, including public bodies, were exempt from the requirement to report on their own supply chains. The guiding conclusion from this report was that this legislation is far from sufficient to address the offences that fall under the Modern Slavery Act 2015. Voss et al (2019) also suggest that Section 54 of the Modern Slavery Act is currently not as effective as intended. Statements vary in quality, and there have been very few prosecutions where they have been inadequate. The experiences of the Modern Slavery Act are cautionary.

---

Given the complexity of eliminating modern slavery and the inherent difficulties in doing this at an organisational level and through legislation, one approach that may be useful is the concept of a multi-stakeholder initiative

### Multi-stakeholder initiatives (MSIs)

Given the complexity of eliminating modern slavery and the inherent difficulties in doing this at an organisational level and through legislation, one approach that may be useful is the concept of a multi-stakeholder initiative (MSI). MSIs are defined by Mena and Palazzo (2012) as global institutions involving corporations and civil society organisations that 'fill the gap' in providing governance solutions for ethical issues where national legislation and other initiatives have failed. MSIs are a result of the co-operation of at least two of the three following actors: government, corporations and civil society (represented by NGOs or humanitarian organisations).

### Four avenues of MSI operation have been identified (Palazzo and Scherer, 2011):

- providing learning platforms;
- developing behavioural standards, eg. codes of conduct;
- developing mechanisms for auditing and compliance; and
- issuing labels and certificates.

Mena and Palazzo (2012) argue that MSIs can effectively privately regulate by meeting the basic requirements of credibility and effectiveness. Comparing the legitimacy of several MSIs would allow a better understanding of the criticism levelled at certain MSIs by NGOs, as well as potential areas of improvement for these initiatives. MSIs can also be benchmarked against the ideal of democratic legitimacy. Crane (2013) highlights the role that MSIs can play in eliminating modern slavery. Gold et al (2015) give the Harkin-Engel Protocol as a good example of an MSI. The Harkin-Engel Protocol was a voluntary agreement to end forms of child labour in the production of cocoa. It was signed in response to a 2003 BBC documentary on the extent of slave and child labour on West African cocoa farms. Bringing together governments, the cocoa industry, cocoa workers and civil society organisations, the Harkin-Engel Protocol led to the founding of the International Cocoa Initiative (ICI) in 2002 as a repository of best practice and a driver for tackling child and slave labour. Gold et al (2015) use this to argue that MSIs are an invaluable approach to the reduction of slavery in the supply chain, but they also go on to identify another approach that interacts at a different level. While MSIs such as the ICI involve a whole host of stakeholders – including vendors and purchasers, unions, legislative and regulatory bodies, and others – community-centred approaches (CCAs) aim to change local institutional settings so as to immunise specific arenas against slavery.

## 2.5 Modern slavery in the context of projects

So far, this section has concentrated on modern slavery in the totality of the organisational experience. However, there are peculiarities to that experience in a project context that make this specific area worthy of investigation. For instance, certain attributes of projects make eliminating modern slavery far more difficult:

**Projects as temporary organisations:** One of the defining features of projects is that they are temporary organisations established in response to a specific customer or client requirement (Sydow and Braun, 2018; Turner and Muller, 2003). This means that both the labour and materials supply chains need to be specifically created each time a new project is embarked upon. This places a high burden on the project delivery organisation to ensure that both material and labour flows are free from the influence of modern slavery. Organisations that are in an operations management rather than a project management scenario can theoretically establish a supply chain in perpetuity. The fact that projects are temporary – and hence need a constant reinvention of material and labour flows – places a much greater burden on project practitioners to ensure that these flows do not contain elements generated by modern slaves.

**Transorganisational governance in projects:** The delivery of projects can require the collaborative effort of a substantive number of different organisations (Ruuska et al, 2010) This often requires a general alignment of governance between organisations, but this will be particularly relevant to governance surrounding issues of modern slavery. Changes to standards, codes of practice and policies to assist in eliminating modern slavery cannot simply be instituted in one organisation. Instead, they will need to be aligned across many organisations. What's more, the relationships between these organisations can often be adversarial, which makes this alignment a far more complex task.

**The highly competitive nature of some project businesses:** Not all projects are carried out by dedicated 'project' businesses (see, for example, internal transformation projects), but some organisations make their money through the repeated delivery of projects – and face down very stiff competition to do so. In these project-focused businesses, the pressure to reduce the cost of material and labour flows is immense. Katenbayeva et al (2016) highlight the susceptibility of construction supply chains and labour flows to modern slavery. Glass (2019) quotes figures showing that just 28 per cent of construction material businesses and 19 per cent of broader construction businesses in the UK produced annual statements that were compliant with the Modern Slavery Act.

Despite these challenges, there are some contextual attributes that facilitate the elimination of modern slavery in projects. Individuals and organisations that deliver projects have recourse to a wide variety of professional membership organisations to support them in project activities. In a UK context, these include the Royal Institute of British Architects, the Royal Institute of Chartered Surveyors, the three Engineering Institutions (Civil, Mechanical, and Structural), the Chartered Institute of Building, the Chartered Institute of Procurement and Supply, and APM. In addition, and regardless of sector or region, project activities are supported by global, project-focused membership organisations. These organisations have an important role to play in codifying knowledge to support effective project management practices, which could be harnessed by initiatives to eliminate modern slavery.

The prevalence of modern slavery and the challenges of eliminating it in a project environment provided the impetus for the central research question behind this investigation, which is reiterated below:

*"How should project management practices be changed to eliminate modern slavery?"*

---

The fact that projects are temporary – and hence need a constant reinvention of material and labour flows – places a much greater burden on project practitioners to ensure that these flows do not contain elements generated by modern slaves

## 3. Investigation approach

### 3.1 Investigation aim and methodology

The aim of this investigation was to answer the following research question:

*"How should project management practices be changed to eliminate modern slavery?"*

The initial scope of the research question was broadened from a focus on megaprojects to the whole of the project experience in order to be of relevance a wider proportion of APM's membership population.

The methodology employed to answer this research question was a Delphi study. A Delphi study is a systematic and interactive research technique for obtaining the judgement of a panel of independent experts on a specific topic. Individuals are selected according to predefined guidelines and are asked to participate in two or more rounds of a structured elicitation of views. After each round, the researchers facilitating the process summarise the responses from the previous round and use it as an input to catalyse responses in the subsequent round, hence reaching a form of group consensus around the initial research question. This research method differs from traditional simple survey methods in that the respondents are identified as having particular expertise before the knowledge elicitation and in that it enables the respondents to arrive at a consensus. This increases the reliability and the extendibility of the research outcomes. Delphi techniques have a long provenance in management research (Wedley et al, 1979) and are still used, particularly in the area of forecasting (Jiang et al, 2017). Delphi methods have been seen as problematic because of the potential for peer pressure to influence results (Ford, 1975). However, in the context of this investigation, the benefits from such an approach counterbalanced these concerns.

The overall approach of the research investigation is presented in Figure 1.

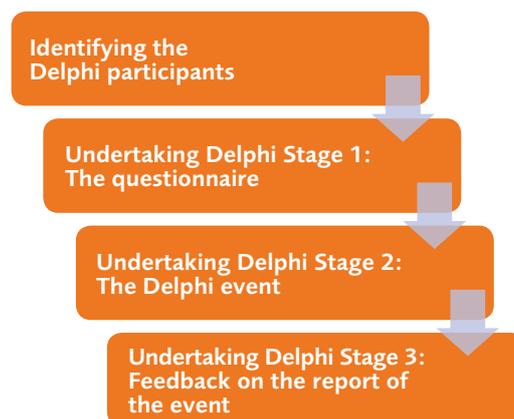


Figure 1: The Delphi process

Expertise was required on the reality of dealing with sensitive ethical issues in a complex corporate setting

### 3.2 Identifying the Delphi participants

As indicated in section 2.1, expertise in eliminating modern slavery from projects can be found across a diverse range of organisations. The Delphi participants needed to represent this broad range of organisational involvement. Furthermore, the expertise required did not exclusively lie in the realm of specific knowledge of modern slavery. Expertise was required on the reality of dealing with sensitive ethical issues in a complex corporate setting. The categories identified as important were:

- professional membership organisations with a significant involvement in project practice;
- corporate project practitioners in sectors in which modern slavery is rife;
- NGOs involved in improving business ethics; and
- academic researchers and individual experts in modern slavery.

Self-selecting volunteer experts were identified through approaches to APM, the Major Projects Association, Constructing Excellence and the researchers' own networks. Some of the initial cadre were unavailable for the date of the Delphi event, so this took place with the following representatives:

<b>Professional membership organisations</b>	Royal Institute of British Architects (RIBA)
	Engineering Construction and Industry Training Board (ECITB)
	International Association for Commercial and Contract Management (IACCM)
	Association for Project Management (APM)
	Institution of Civil Engineers (ICE)
<b>Project practitioners</b>	Jacobs
	HS2
	Sir Robert McAlpine
	Nichols Group
	Mace Dragados
<b>NGOs</b>	Institute for Human Rights and Business
	Bingham Centre
	Office of the Independent Anti-Slavery Commissioner
<b>Academic researchers and independent experts</b>	A further four academic researchers and independent experts

Experts were asked to represent the views of their organisations

### **3.3 Delphi Stage 1: The questionnaire**

The survey instrument was developed by the researchers by operationalising the research question. The questionnaire aimed to cover the experts' individual and organisational experiences of modern slavery and to pose a specific challenge to elicit a response in the context of projects, the specific focus of this investigation.

The survey questionnaire is attached in Appendix 1 of this report. The responses to the questionnaire were then collated and analysed using a 'template' approach (with the initial questions acting as the template). As a result of the initial analysis, the questions were focused into two further questions and populated with the response from the original questionnaire to seed the discussion.

### **3.4 Delphi Stage 2: The Delphi event**

The Delphi event was held on the afternoon of 15 November 2019 at The Bartlett School, UCL. The programme of the event is given in Appendix 2 of this report. Given the disparity in the experts' experience in issues of modern slavery and the definitional issue, the event began with a presentation to 'onboard' participants, providing a background to this investigation and the definition of modern slavery being adopted by it. Participants were then provided with vignette scenarios concerning modern slavery to act as a stimulus for their discussions.

The expert participants were divided into four multi-disciplinary groups and asked to respond to specific questions formulated from the initial questionnaire. The questions were:

- What can a project professional do to eliminate modern slavery from projects?
- What can professional membership organisations do to assist project professionals in eliminating modern slavery from projects?

They were asked to capture their discussions on A1 pro forma and then to present their group's findings to the whole cohort. Notes were taken on these presentations by the investigation team and triangulated between members.

Following the event, the responses of the expert participants (in terms of the completed pro forma and the notes from their presentations) were collated by the investigation team. These were then analysed through a combination of templates and thematic analysis to yield a series of thematic findings. The investigation team then reflected on these findings to identify what implications these had for ongoing actions to change project practice to eliminate modern slavery.

### **3.5 Delphi Stage 3: Feedback on the event findings and the implications for action**

The final stage in the Delphi process was to capture the outcome of the event in report form and to issue this back to participants for a final opportunity for them to refine their responses. Two specific questions were asked about the outcomes encapsulated in the report:

- Participants were asked if the 'Summary of findings' failed to capture an issue that was considered important; and
- Participants were asked if the 'Implications for action' were erroneous or if any important implications had been missed.

The responses from the participants were then incorporated into a final set of findings and recommendations.

## 4. Findings

### 4.1 Initial questionnaire findings

This section delineates the findings from the first phase of the Delphi exercise, the questionnaire. It also explains how these results were used to seed the discussion in the next round of the Delphi exercise.

**Experts' personal experience of modern slavery:** Most experts had not had direct, personal encounters with modern slavery but have become increasingly aware of it at a project, programme and organisational level through the experience of others. Those who had encountered modern slavery highlighted the increased presence of modern slavery in certain geographical areas. Some experts pointed to the importance of research in shaping their encounters with modern slavery.

**The impact of the 2015 Modern Slavery Act:** The Modern Slavery Act has had mixed results. Some changes include the rise of more mature ethical sourcing. The use of organisations such as SEDEX is a good example of this.

**Manifestations of modern slavery in projects and their supply chains:** Modern slavery is manifested primarily through labour and material flows. The country or region provides an important context. Modern slavery is more likely to be an issue in projects and programmes carried out in particular countries. The industry context is also important. A fractured supply chain characterised by several levels and poor transparency can often hide modern slavery. The use of a complex web of labour agencies, sub-contractors and criminal organisations acts as a warning signal.

**The major challenges to eradicating modern slavery from projects:** The expert participants highlighted the following factors:

- power dynamics between larger and smaller organisations in supply chains;
- difficulties capturing the true impacts of supplier cost-reduction strategies;
- lack of understanding and ignorance about modern slavery;
- lack of industry-wide support;
- data protection restraints; and
- the drive for cost competition.

**Possible solutions to eliminate modern slavery from projects:** The following factors were identified:

- changes in the ethical and moral environment in which projects are performed, driving change and informing decision-making;
- certification schemes provided and policed by professional project management organisations;
- techniques for more robust identification of stakeholders;
- more effective project and programme governance;
- effective use of technologies such as blockchain and organisations such as SEDEX; and
- greater supply chain scrutiny.

**The role of formal project management practices in eliminating modern slavery:** The expert participants highlighted the 'piggy-back' role of formal project management. It provides a foundation that modern slavery elimination strategies can be bolted onto. For example, formal project management can:

- foster and promote ethical ways of working;
- strengthen governance;
- facilitate a piggy-back strategy; and
- enable/shed light on procurement practices.

---

**Formal project management provides a foundation that modern slavery elimination strategies can be bolted onto**

The greatest challenge in interpreting the experts' responses lay in structuring those responses to be able to produce provenanced, feasible and specific recommendations. This dilemma echoed the definitional difficulties explored in this report. To this end, a framework was developed that encouraged the experts to categorise their experiences at an individual, organisational and sectoral level. This was seeded with responses from the questionnaire and presented for the experts' examination at the next round of the Delphi investigation.

## 4.2 Delphi exercise and feedback findings

This section presents a summary of findings, thematically grouped in terms of the two questions posed at the Delphi event. These contain the amendments submitted by the participants in the final round of the exercise, as well as feedback on the outcomes report.

### 4.2.1 Factors affecting the elimination of modern slavery from projects

The responses from the multi-disciplinary groups were collated and aggregated to give the themes presented in Figure 2.

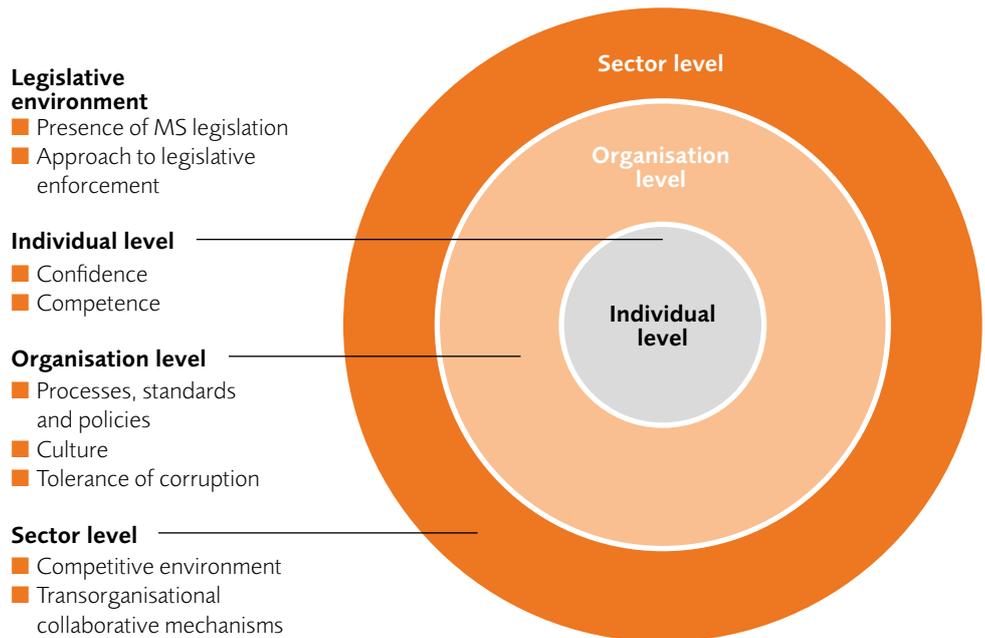


Figure 2: Factors affecting the elimination of modern slavery from projects

#### Individual-level factors

The findings indicate that, for an individual working on a project, confidence and competence are deemed vital attributes. These attributes are necessary in order to recognise modern slavery and to know what to do to when it is encountered. A project actor who works in a project organisation that has a code of conduct, a supportive culture, effective project-level stakeholder engagement and senior management buy-in will be more confident.

In contrast, a project actor is likely to have reduced confidence if he or she cannot speak the local language, doesn't know his or her rights, or knows that nothing will be done after flagging modern slavery. Fear for their own safety, fear of being misunderstood, and fear that their actions may make things worse or make them look stupid also reduce the project actor's confidence in recognising modern slavery and knowing what to do.

Processes, standards and policies, culture, and tolerance of corruption were critical factors influencing the ease with which modern slavery can be eliminated from project delivery

In addition, if the project actor works in a project organisation that works to an agreed standard and approach, with access to training, mentoring, induction, continuing professional development and access to advice and guidance on modern slavery, that project actor will have not only increased confidence but also the competence to recognise modern slavery and know what to do. In contrast, if the project actor lacks access to grievance mechanisms, the ability to raise issues, and knowledge of what modern slavery looks like, they will have reduced confidence and competence when it comes to recognising modern slavery and knowing what to do.

### Organisation-level factors

The findings indicated that, at the organisational level, processes, standards and policies, culture, and tolerance of corruption were critical factors influencing the ease with which modern slavery can be eliminated from project delivery.

**Processes, standards and policies:** Individual organisations need to develop standard approaches that give project participants guidance on (or that even mandate) their actions when they encounter modern slavery. These standard approaches need to be supported with appropriate training and reinforced with sanctions where required. The expert participants recognised the need, among other approaches, for:

- organisational codes of conduct;
- training and training assurance;
- altered induction processes to address issues of modern slavery;
- inclusion and alignment of modern slavery policies with other areas such as health and safety, as part of a 'piggy-back' approach;
- supply chain processes that have clear sanctions if modern slavery is encountered, particularly via project control and governance mechanisms (possibly by embedding this into contract conditions, eg. withholding payments, or payments directly related to KPIs); and
- close partnerships with other stakeholder project organisations to improve standards relating to eliminating modern slavery.

The experts also highlighted the utility of sharing organisations' approaches to standards and auditing at a project level.

**Culture:** The expert participants noted that a culture which does not prioritise doing the right thing over making a short-term profit is likely to be a seed bed for modern slavery. Optimism bias or an attitude of 'It'll be OK' without taking any action to make it so were also identified as enablers of modern slavery. A culture which fails to promote concern for issues of corporate social responsibility through an obvious lack of interest by senior management was also seen as a culture in which modern slavery could thrive.

**Tolerance of corruption:** Although related to culture, the expert participants felt that tolerance of corruption was particularly strongly related to the prevalence of modern slavery in projects. A clear anti-corruption stance was viewed as highly conducive to engendering a similar response to modern slavery in projects.

### **Sector-level factors**

One of the most important factors identified by the expert participants at a sector level was the presence of a competitive environment. This operated both as an enabler and a barrier. Slim profit margins and the compression of project lead times may well drive organisations towards low-cost solutions, which could potentially involve modern slaves. This was particularly true in the construction sector, which suffers from very slim contractor margins. Conversely, competitive environments where a reputation for ethical project work is seen as important by consumers may make organisations far more careful about avoiding modern slavery in their projects. A similar situation might be encountered where project investors require projects to demonstrate their adoption of measures to eliminate modern slavery from their remit.

Another factor enabling the elimination of modern slavery was the promotion within the sector of transorganisational collaborations. These included such initiatives as:

- sector-wide agreements on common standards for modern slavery prevention;
- provision of access to sector-wide best practice (eg. case studies, reports and lessons learned);
- awareness campaigns, anti-slavery days and other such events; and
- sectoral promotion of pre-qualification questionnaires.

### **Legislative environment factors**

Unsurprisingly, the expert participants identified the presence of anti-slavery legislation as a crucial factor in promoting a project environment free from modern slavery. However, legislation should not only be put in place: it should also be enforced.

Participants saw the role of professional associations as acting in three main spheres of activity: at an organisational and sectoral level, and also in influencing the legislative environment

#### 4.2.2 The role of professional associations in eliminating modern slavery from projects

The expert participants in the Delphi exercise also identified what they perceived as the role that professional membership organisations could play in eliminating modern slavery from project organisations. Figure 3 demonstrates how participants saw the role of professional associations as acting in three main spheres of activity: at an organisational and sectoral level, and also in influencing the legislative environment.

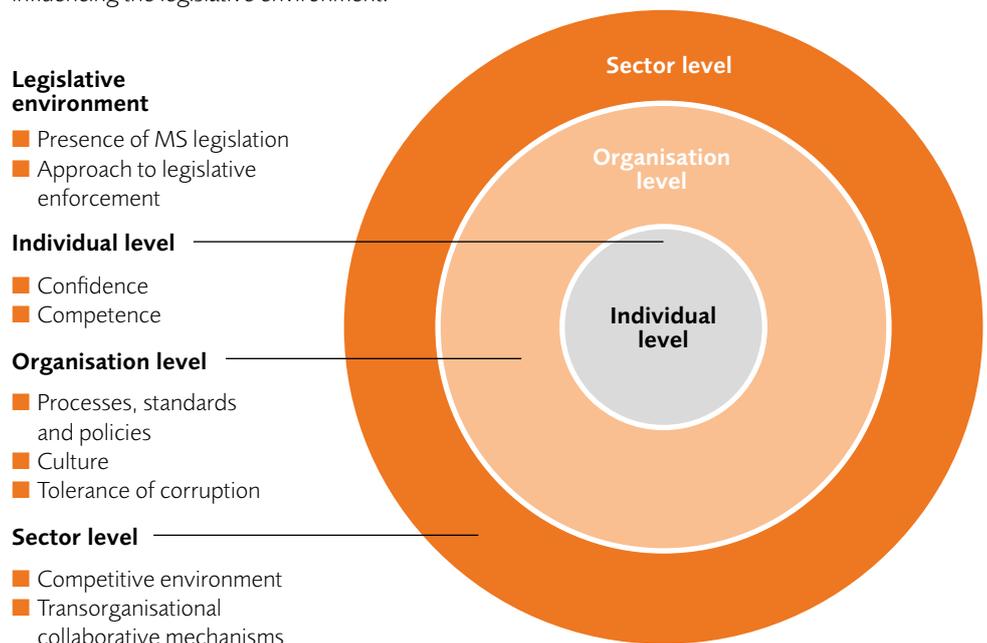


Figure 3: Spheres of impact of professional membership organisations in eliminating modern slavery

##### Organisation-level roles

The participants felt that the key role for professional membership organisations at an organisational level was to support the provision of standards and processes. This would be achieved through activities such as:

- defining, updating and reviewing standards;
- prescribing processes;
- formulating model contract terms;
- providing codes of conduct;
- providing and updating training, mentoring frameworks, competence frameworks and continuing professional development; and
- providing induction materials.

##### Sector-level roles

One of the key roles envisaged by the participants for professional membership organisations at a sectoral level was the dissemination of best practice advice. This would be achieved through activities such as:

- collating, analysing and sharing case studies;
- generating lessons learned;
- providing advice and guidance across the sector; and
- publishing rankings and statistics on sectoral performance.

Participants also identified that professional organisations could provide wider support through the provision of:

- reporting services;
- helplines (e.g. Unseen UK's modern slavery hotline);
- expert witness services; and
- lobbying and advocacy work with project client bodies within and across sectors.

#### Legislative environment and individual-level roles

The participants also suggested that professional organisations should aim to have an impact at an individual level by setting the standards of conduct with respect to modern slavery for individual members. These mandated standards of behaviour would mean that individuals could be 'struck off' or disciplined if they failed to follow them. Professional membership organisations also had a role to play in promoting changes in the legislative environment.

#### 4.2.3 Other issues

The Delphi exercise participants also highlighted the following issues relating to the elimination of modern slavery from projects:

- Standards are useful, even if incomplete or inadequate, as at least they start a conversation.
- Making official immigration procedures simpler and cheaper will disincentivise migrant workers from using unofficial routes and falling into modern slavery.
- Transnational organisations should use the best national standards globally.
- Legislation and standards are only effective if they are enforceable.
- Collaboration across the project supply chain and between competitors is vital if modern slavery is to be eliminated from projects.

### 4.3 Implications of findings for action

#### 4.3.1 Changing the behaviour of individuals is the dominant factor in eliminating modern slavery from projects

Having summarised the findings from the expert participants' discussions, the investigation team then reflected on these in order to assess their implications for eliminating modern slavery (see Figure 4 below).

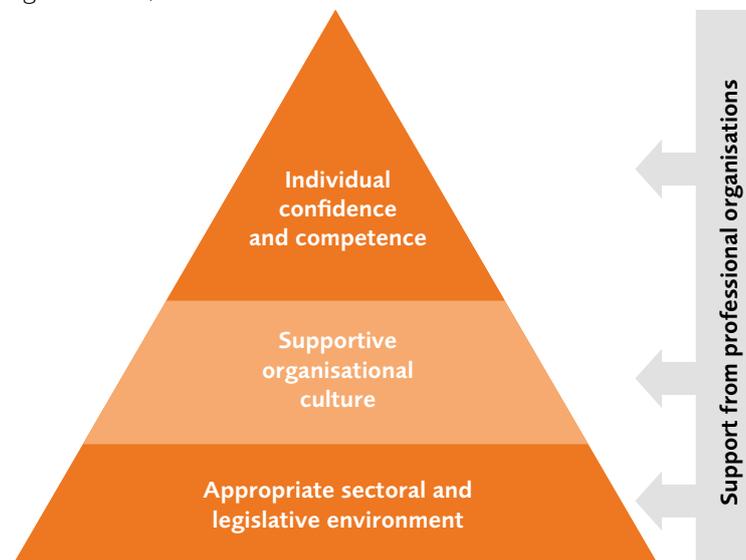


Figure 4: Requirements for the elimination of modern slavery in projects

Competence and confidence interact in a virtuous circle. The more competent an individual feels in dealing with a situation involving modern slavery, the more confident they are going to be in acting in an appropriate manner

The investigation team recognised the dominant role that changing an individual project participant's behaviour has on eliminating modern slavery from projects. Individuals will be responsible for recognising modern slavery and for acting in a way to eradicate it. In order to change individuals' behaviour to improve their ability to do this, individuals need to have improved competence and confidence.

Individuals need competence to:

- be aware of modern slavery in their project; and
- know what to do when they uncover it.

Individuals need confidence to have the courage to do the right thing.

Competence is engendered through having an appropriate framework of standards and processes and being trained in how to use them. Confidence arises when an individual is not afraid of jeopardising their own career or safety by speaking out and does not fear making the situation worse by acting. Confidence, to a certain extent, is a personality trait – but it can be developed. For example, the seniority of an individual may increase their levels of confidence. Competence and confidence interact in a virtuous circle. The more competent an individual feels in dealing with a situation involving modern slavery, the more confident they are going to be in acting in an appropriate manner.

Improving the confidence and competence of an individual to act sits at the apex of the framework of activities required to eliminate modern slavery from projects (see Figure 4). However, this apex needs to be supported by an appropriate organisational context and a favourable sectoral and legislative environment.

#### **4.3.2 Individual confidence and competence are developed within an organisational context**

Although confidence and competence are individual attributes, they need action at an organisational level to develop them. As such, eliminating modern slavery from projects needs a clear organisational framework of standards, policies and procedures that have been developed so that modern slavery is precluded from projects.

This will be far easier to undertake in an organisation that has a high level of project maturity. Such an organisation will already possess a framework of interlinked processes, standards and governance that relate to project governance. Additional elements that relate specifically to eliminating modern slavery can be injected into these.

Formal aspects of the organisation are insufficient, on their own, to develop confidence and competence. The organisational culture also needs to be supportive, and senior management have a vital role to play in this respect. 'Calling out' and 'not walking past' must be seen as not only acceptable but an imperative. As with formal organisation-level characteristics, this cultural acceptability will be easier to engender if it is already in place for other aspects of the project, such as quality or health and safety.

### **4.3.3 Sectoral competition can act as a driver and an inhibitor of modern slavery**

Sectoral competition drives organisations into situations where modern slavery thrives. Pressure to reduce costs and lead times for projects can cause organisations to use labour and material flows that encompass modern slavery. Resisting these competitive pressures is very difficult for individual organisations. Action is required at a sector-wide level to overcome these and will need to be legislative and global to be effective.

That said, sectoral competition does not always drive the use of modern slavery – it can also inhibit it. This is especially true where investors or customers are highly sensitive to reputation. Organisations that are found to have used modern slavery are likely to lose substantive business in these situations, either through lost business or legislative penalties.

### **4.3.4 Professional membership organisations can offer support at an individual, organisational and sectoral level**

Professional membership organisations are well placed to support the elimination of modern slavery from projects at an individual, organisational and sectoral level. At a sectoral level, they have the transorganisational reach to promote change to governments and to create sectoral codes of practice (for example, around issues such as contract terms). At an organisational level, they can provide exemplar project governance structures that practitioners can adopt. At an individual level, they can provide guidance and codes of practice for behaviour, as well as helplines that individuals can access outside the organisations to which they belong. As such, professional membership organisations may give individuals confidence and competence to eliminate modern slavery, despite the organisational and sectoral context that they find themselves in. The involvement of professional membership organisations in eliminating modern slavery in projects is important and can contribute to success.

## 5.0 Recommendations

### 5.1 Recommendations for researchers

The work of this investigation informs two specific streams of research and provides useful starting points for further research activities:

**Further developing the framework:** Reviewing the context of modern slavery for this research revealed the definitional problems that researchers have encountered when trying to reflect upon modern slavery. Providing a framework through which to explore and temper reflections is a vital part of this type of research. This work builds on the seminal output of researchers such as Maon et al (2009) in outlining corporate social responsibility. The 'onion' framework developed in Figures 2 and 3 – comprising concentric spheres of individual, organisation and sector activity occurring within a legislative environment – proved to be useful in understanding mitigation strategies for eliminating modern slavery. The utility of such a framework in the context of other aspects of corporate social responsibility could be a fruitful research endeavour.

It was striking to note the similarity between the participants' views of professional membership organisations and the functionality of MSIs

**The congruence of multi-stakeholder initiatives and the role ascribed by the Delphi participants to professional membership organisations:** It was striking to note the similarity between the participants' views of professional membership organisations and the functionality of MSIs as described by Scherer and Palazzo (2011). See Table 2.

Characteristics of MSIs	Activities ascribed to professional membership organisations
Developing behavioural standards, eg. codes of conduct	Codes of conduct
Providing learning platforms	Processes, standards and policies
Developing mechanisms for auditing and compliance	Transorganisational collaborative mechanisms
Issuing labels and certificates	Stimulation of legislation

*Table 2: Comparing the functionality of MSIs and professional membership organisations in eliminating modern slavery*

This suggests that the further investigation of professional membership organisations acting as MSIs could be very useful in identifying mechanisms to eliminate modern slavery in projects. Case-based research to understand professional project organisations such as MSIs could be useful in the context of corporate social responsibility.

## 5.2 Recommendations for project practitioners

A key concern raised by the experts in the initial questionnaire component of the Delphi exercise was the cost of anti-slavery initiatives. This consideration has been given extreme importance when crafting the following recommendations, which as far as possible use existing structures and practices as a foundation for further development. However, this does not negate the fact that labour and material flows that do not involve modern slavery are likely to be more expensive. Project practitioners need to understand how much additional cost they are willing to bear not to be implicated in modern slavery.

### Specific recommendations

**Improve the organisation's overall project management maturity:** A useful starting point for practitioner organisations wishing to eliminate modern slavery from their projects is to consider their overall project management maturity. Increasing maturity in project management is associated with more effective project delivery. By improving adherence to existing standards and policies relating to project management practice, organisations can build effective routes towards incorporating anti-slavery measures into project governance and ensuring those measures are adhered to.

**Develop a clear message to be delivered to all individuals involved in the project and 'piggy-back' on other similar initiatives:** Many projects will already be conducted in an environment where there is a statutory responsibility to give all actors involved specific and defined information. This will normally pertain to health and safety. In a construction context, this will relate to CDM (construction design and management) regulations. By reviewing these existing mechanisms, routes can be identified that already get universal policy messages to individuals. Project practitioners can then draft a simple policy statement that:

- describes how individuals may encounter modern slavery in their work; and
- explains what to do if individuals think they have encountered modern slavery.

This will provide individuals with the confidence to act in the face of modern slavery and can be incorporated into the existing communication mechanisms at relatively little extra cost.

**Consider amending existing project procurement mechanisms:** Existing project procurement procedures are already likely to involve measures that streamline the tendering process. Usually, this is carried out by a mechanism such as a pre-qualification questionnaire (PQQ). PQQs could be amended to ensure that all sub-contractors comply with legislation such as the Modern Slavery Act and take active (and enumerated) steps to eliminate modern slavery in their own sub-contractors. Such flow-down contractual requirements are commonplace in sectors with particular legislative responsibilities – such as nuclear decommissioning – but there is no reason why they cannot be used elsewhere.

**Focus on material flow hotspots:** Monitoring the complex and frequently changing world of a project's material flow to eliminate modern slavery is an impossible task. This is especially true for large projects where expenditure on material flow will run into the billions. In this situation, it is important that project practitioners undertake material flow scanning exercises to highlight the classes of material that they procure that are most likely to have involved modern slavery. Efforts should then be focused on these aspects of material flow every time a new project supply chain is established. Network Rail undertook a similar exercise and identified that the procurement of protective equipment was one of the material flows that was often delivered by modern slaves and is now subject to high levels of scrutiny whenever its projects demand new sources.

**Look out for developments in digital project data and analytics:** Much of the difficulty of policing material and labour flows in a project environment lies in the huge complexity and scale of the organisations involved in project delivery. Mapping that complex network is an immensely difficult exercise but one that will be made far simpler by the advent of analytical tools for Big Data in a project context. Particularly relevant in this context is the United Nations University's Delta 8.7

exercise (delta87.org). Although many of these applications are immature, as project practitioners increasingly use data analytics in their projects, they will need to consider their application to modern slavery elimination initiatives.

### 5.3 Recommendations for professional membership organisations

The most important finding for professional membership organisations that participate in the project arena is the unique role that they can play in eliminating modern slavery from projects. They are able to initiate and govern activities at individual, organisational and sectoral levels, as well as in the broader legislative environment. The recommendations listed below capitalise on this ubiquity. However, professional membership organisations need to recognise how to resolve conflicts of interest that are inherent to this multiplicity of roles. They need to understand how to support individual members in complying with the various codes of conduct that corporate members of the same project organisation may be violating.

#### Specific recommendations

**Review codes of conduct to include considerations of modern slavery:** Nearly all professional membership organisations have codes of conduct which individuals must comply with if they are to be allowed to remain a member of the professional body. These are very important, as breaching the code of conduct could in some cases mean exclusion from the profession and potentially from the individual's source of employment. Currently, professional codes of conduct incorporate little specifically to do with eliminating modern slavery. Professional membership organisations should review their codes of conduct to ensure that members are precluded from dealing with modern slavery in terms of material and labour flows.

**Review individual training that they provide for professional development:** Professional organisations often provide accredited training routes for individuals' professional development, sometimes leading to a defined status. These individual training offerings should be reviewed to ensure they cover the identification of modern slavery and the next steps that should be taken.

**Consider how modern slavery is addressed in their offer to corporate members:** Professional membership organisations not only act at an individual level but also have corporate organisation-level interactions. These involve providing organisations with explicit bodies of knowledge and/or competency frameworks. Additionally, they provide thought leadership in terms of where the profession may be developing. Professional membership organisations are continually evaluating and refining their corporate offerings, and incorporating procedures that relate to eliminating modern slavery could easily be accommodated in one of these routine reviews. Professional membership organisations also need to reflect on the reputational damage they would experience if one of their members was found to be implicated in a case of modern slavery. They should assess whether this awareness should form part of their thought leadership development and hence should appear in some format in their programme of corporate activities.

**Consider sector-level and government campaigning roles:** The Delphi participants clearly identified a requirement for professional membership organisations to share best practice advice regarding eliminating modern slavery at a sector level. This included collating, analysing and sharing case studies and generating lessons learned. A further requirement was identified in terms of providing rankings and statistics across organisations relating to the elimination of modern slavery from members' projects. Professional membership organisations are uniquely positioned to offer these services, and they should reflect on whether their mission statement confer a moral imperative on them to do so. There may even be a business case in support of such activities. Similarly, the degree to which professional bodies engage in campaigning naturally varies. Legislation such as the Modern Slavery Act is a crucial element in counteracting modern slavery, but it needs to reflect reality in order to be effective. Campaigning for change is a good way to get a practitioner's viewpoint into such legislation, but it also requires considerable resources and specialist knowledge. Professional membership organisations again need to reflect on their mission statements when it comes to carrying out such activities in the context of eliminating modern slavery.

---

Campaigning for change is a good way to get a practitioner's viewpoint into legislation, but it also requires considerable resources and specialist knowledge

## References

- Bales, K., Hesketh, O., & Silverman, B. (2015). Modern Slavery in the UK: How many victims?. *Significance*, 12(3), 16-21.
- Blitz, B., & Simic, A. (2019). The Modern Slavery regime: A critical evaluation. *Journal of the British Academy*, 7 (Supp. 1), 1-34.
- Chuang, J. (2015). Debate: The challenges and perils of reframing trafficking as 'modern-day slavery'. *Anti-Trafficking Review*, (5).
- Chesney, T., Evans, K., Gold, S., & Trautims, A. (2019). Understanding Labour Exploitation in the Spanish Agricultural Sector Using an Agent-Based Approach. *Journal of cleaner production*, 214, 696-704.
- Cockayne, J. (2016). The Anti-slavery Potential of International Criminal Justice. *Journal of International Criminal Justice*, 14(2), 469-484.
- Crane, A. (2013). Modern Slavery as a Management Practice: Exploring the conditions and capabilities for human exploitation. *Academy of Management Review*, 38(1), 49-69.
- Deshingkar, P., Awumbila, M., & Teye, J. K. (2019). Victims of Trafficking and Modern Slavery or Agents of Change? Migrants, brokers, and the state in Ghana and Myanmar. *Journal of the British Academy*, 7(S1).
- Ford, David A. Shang Inquiry as an Alternative to Delphi: Some experimental findings. *Technological Forecasting and Social Change* 7.2 (1975): 139-164.
- Gadd, D., & Broad, R. (2018). Troubling Recognitions in British Responses to Modern Slavery. *The British Journal of Criminology*, 58(6), 1440-1461.
- Glass, J. (2019). Modern Slavery Project (Product) Supply Chains: Manifestation of context and problematising for future research, Presentation at the Annual Meeting of the Academy of Management – Professional Development Workshop, August 2019.
- Gold, S., Trautims, A., & Trodd, Z. (2015). Modern Slavery Challenges to Supply Chain Management. *Supply Chain Management: An International Journal*, 20(5), 485-494.
- Jiang, R., Kleer, R., & Piller, F. (2017). Predicting the Future of Additive Manufacturing: A Delphi study on economic and societal implications of 3D printing for 2030. *Technological Forecasting and Social Change*, 117, 84-97.
- International Labour Office, (2008). *Combating Forced Labour: A handbook for employers and business*. Geneva: International Labour Office
- International Labour Organization, (2017). *Global Estimates of Modern Slavery: Forced labour and forced marriage*, ILO, Geneva, Switzerland
- Katenbayeva, A., Glass, J., Anvuur, A. M., & Ghumra, S. (2016). Developing a Theoretical Framework of Traceability for Sustainability in the Construction sector. 12th Corporate Responsibility Research Conference, Istanbul, Turkey.
- Maon, F., Lindgreen, A., & Swaen, V. (2009). Designing and Implementing Corporate Social Responsibility: An integrative framework grounded in theory and practice. *Journal of Business Ethics*, 87(1), 71-89.

- Mena, S., & Palazzo, G. (2012). Input and Output legitimacy of Multi-Stakeholder Initiatives. *Business Ethics Quarterly*, 22(3), 527-556.
- New, S. J. (2015). Modern Slavery and the Supply Chain: The limits of corporate social responsibility?. *Supply Chain Management: An International Journal*. 20(6), 697-707.
- Patterson, O., & Zhuo, X. (2018). Modern Trafficking, Slavery, and Other Forms of Servitude. *Annual Review of Sociology*, 44, 407-439.
- Pinheiro, S., Emberson, C., & Trautri, A. (2019). 'For the English to see' or effective change? How supply chains are shaped by laws and regulations and what that means for the exposure of modern slavery. *Journal of the British Academy*, 7(s1), 167-190.
- Public Health England, (2019). <https://www.gov.uk/government/publications/modern-slavery-and-public-health/modern-slavery-and-public-health#definition-of-modern-slavery> [accessed 31/01/2020]
- Ruuska, I., Ahola, T., Artto, K., Locatelli, G., & Mancini, M. (2011). A New Governance Approach for Multi-Firm Projects: Lessons from Olkiluoto 3 and Flamanville 3 nuclear power plant projects. *International Journal of Project Management*, 29(6), 647-660.
- Scherer, A. G., & Palazzo, G. (2011). The New Political Role of Business in a Globalized World: A review of a new perspective on CSR and its implications for the firm, governance, and democracy. *Journal of Management Studies*, 48(4), 899-931.
- Sydow, J., & Braun, T. (2018). Projects as Temporary Organizations: An agenda for further theorizing the interorganizational dimension. *International Journal of Project Management*, 36(1), 4-11.
- Turner, J. R., & Müller, R. (2003). On the Nature of the Project as a Temporary Organization. *International Journal of Project Management*, 21(1), 1-8.
- Voss, H., Davis, M., Sumner, M., Waite, L., Ras, I. A., Singhal, D., & Jog, D. (2019). International Supply Chains: Compliance and engagement with the Modern Slavery Act. *Journal of the British Academy*, 7(s1), 61-76.
- Wedley, W., Jung, R., & Merchant, G. (1979). Problem-Solving the Delphi Way. *Journal of General Management*, 5(1), 23-36.

### **Additional material**

- Bales, K. (2002). The Social Psychology of Modern Slavery. *Scientific American*, 286(4), 80-88.
- Bales, K., Trodd, Z., & Williamson, A. K. (2011). *Modern Slavery: A beginner's guide*. Oneworld Publications.
- Craig, G. (2017). The UK's Modern Slavery Legislation: An early assessment of progress. *Social Inclusion*, 5(2), 16-27.
- Davidson, J. O. C. (2010). New Slavery, Old Binaries: Human trafficking and the borders of freedom. *Global Networks*, 10(2), 244-261.
- Davidson, J. O. C. (2015). *Modern Slavery: The margins of freedom*. Springer.
- Datta, M. N. (2014). Using Big Data and Quantitative Methods to Estimate and Fight Modern Day Slavery. *S AIS Review of International Affairs*, 34(1), 21-33.
- LeBaron, G., & Rühmkorf, A. (2017). Steering CSR through Home State Regulation: A comparison of the impact of the UK Bribery Act and Modern Slavery Act on global supply chain governance. *Global Policy*, 8, 15-28.
- Jansson, D. B. (2014). *Modern Slavery: A comparative study of the definition of trafficking in persons*. Martinus Nijhoff Publishers.
- Kara, S. (2017). *Modern Slavery: A global perspective*. Columbia University Press.
- Kempadoo, K. (2015). The Modern-Day White (Wo) man's Burden: Trends in anti-trafficking and anti-slavery campaigns. *Journal of Human Trafficking*, 1(1), 8-20.
- Ngwe, J. E., & Elechi, O. O. (2012). Human Trafficking: The modern day slavery of the 21st century. *African Journal of Criminology & Justice Studies*, 6.
- O'Connell Davidson, J. (2013). *Troubling Freedom: Migration, debt, and modern slavery*. *Migration Studies*, 1(2), 176-195
- Rezaeian, M. (2016). The Emerging Epidemiology of Human Trafficking and Modern Slavery. *Middle East Journal of Business*, 55(3705), 1-5.
- Scarpa, S. (2008). *Trafficking in Human Beings: Modern slavery*. Oxford University Press on Demand.
- Siller, N. (2016). Modern Slavery: Does international law distinguish between slavery, enslavement and trafficking?. *Journal of International Criminal Justice*, 14(2), 405-427.
- Skinner, E. (2008). *A Crime so Monstrous: Face-to-face with modern-day slavery*. Simon and Schuster.
- Stevenson, M., & Cole, R. (2018). *Modern Slavery in Supply Chains: A secondary data analysis of detection, remediation and disclosure*. *Supply Chain Management: An International Journal*.
- Stringer, C., & Michailova, S. (2018). *Why Modern Slavery Thrives in Multinational Corporations' Global Value Chains*. *Multinational Business Review*.
- Ucnikova, M. (2014). OECD and Modern Slavery: How much aid money is spent to tackle the issue?. *Anti-Trafficking Review*, (3).

## **Appendix 1**

### **Initial survey questionnaire**

1. Tell us about you.
2. What is your job role?
3. What is your personal experience of dealing with modern slavery?
4. What is the experience of modern slavery within your organisation?
5. Have either of these experiences changed since the Modern Slavery Act of 2015?
6. How do you think MS manifests itself in projects and their supply chains?
7. In your view, what are the major challenges to eradicating modern slavery from projects?
8. What possible solutions could be used to eliminate modern slavery from projects?
9. What role can changing formal project management practices play in eliminating modern slavery?

## **Appendix 2**

### **Event running order**

- 13:45 Registration and refreshments
- 14:00 Welcome, Professor Naomi Brookes, University of Leeds
- 14:05 APM and its research activity, Daniel Nicholls, Association for Project Management
- 14:10 Setting the scene: Modern slavery in projects, Professor Jacqui Glass, The Bartlett School, UCL
- 14:20 The way ahead: Feedback from the initial Delphi questionnaire  
Dr Gloria Oliogmobe, University of Leeds
- 14:30 Delphi exercise 1: Eliminating modern slavery – Individual, organisational and sectoral perspectives
- 15:20 Delphi exercise 2: Prioritising and refining responses (Refreshments will be served during this activity)
- 15:45 Delphi exercise 3: The role of professional organisations in eliminating modern slavery in projects
- 16:30 Feedback and the way forward, Professor Naomi Brookes, University of Leeds

## Association for Project Management

Ibis House, Regent Park,  
Summerleys Road,  
Princes Risborough,  
Buckinghamshire HP27 9LE

**Tel (UK)** 0845 458 1944  
**Tel (Int)** +44 1844 271 640  
**Email** [info@apm.org.uk](mailto:info@apm.org.uk)  
**Web** [apm.org.uk](http://apm.org.uk)

### APM Research Fund Series

The APM Research Fund has been set up within the Research programme to provide funding for small-scale research projects or to provide seed funding for larger research projects.



For further information, please visit [apm.org.uk/research](http://apm.org.uk/research)

Please contact us with your views and suggestions:  
[research@apm.org.uk](mailto:research@apm.org.uk)