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The UK construction and facilities management sector's response to the Modern Slavery Act: an intra-industry initiative against modern slavery

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Addressing modern slavery in UK construction

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The UK construction and facilities management sector's response to the Modern Slavery Act: an intra-industry initiative against modern slavery

Introduction

Decent work for all has been identified as a key UN Sustainable Development Goal. The risk of potentially using unethical labour practices in supply chains has been receiving increasing attention on strategic corporate agendas (Lund-Thomsen and Lindgreen, 2014). This has been driven by increased awareness and reduced tolerance for supply chain ignorance on the consumer side and by new legislation – both leading to increased pressures for both action and disclosure (Marshall et al., 2016). New legislation in form of the Modern Slavery Act 2015 forces particularly organisations operating in the UK to address and confront the issue of unethical labour practices in their supply chains.

Unethical labour practices in supply chains are not, per se, a new topic. Child labour has been a regular and frequent occurrence in the global textile industry (Smestadt, 2010) and the atrocious conditions under which blood diamonds and many minerals are being mined have been explored in past research (Hofmann et al., 2018). A key difference to previous ethical problems in supply chain management however lies in the legal approach of the UK's Modern Slavery Act. The Act includes a section that requires companies to produce an annual statement on modern slavery in their supply chains. In contrast to business obligations against bribery it does not include penalties for non-compliance and leaves enforcement largely to civil society (LeBaron and Rühmkorf, 2017), which is resulting in much lower compliance rates in comparison to other reporting obligations, for example the gender pay gap reporting obligations. (Phillips and Trautrims, 2018).

Meaningful corporate responses to ethical challenges in supply chains may require sector-wide initiatives, combining the procurement volume and supply chain power of the main players in a sector. Such efforts are called Multi-Stakeholder Initiatives (MSIs), i.e. "multi-sectoral initiatives that bring together a range of stakeholders to create governance solutions for social and environmental problems" (Moog et al., 2015: 470). They are increasingly considered critical to tackle complex contemporary societal challenges as these cannot be resolved by a single organisation and thus require multi-stakeholder engagement (Berkowitz et al., 2017; Roloff, 2008). MSIs establish processes for standard-setting as well as social and environmental reporting, and sometimes implement monitoring mechanisms such as certification and third-party verification of adherence to new governance norms (Moog et al., 2015). Examples include the cocoa industry's International Cocoa Initiative (ICI) against forced and child labour in West Africa, the Conflict Free Smelter Initiative and the Kimberley Process on blood diamonds. Yet little is known about the processes in which sustainability managers must engage to create and maintain an effective MSI.

This paper discusses the case of setting up a specific type of multi-stakeholder initiative - an intra-industry alliance - in the UK construction and facilities management sector. This sector is regularly highlighted by the UK's Independent Anti-Slavery Commissioner for its high modern slavery risk. From a conceptual point of view, this paper adds to the literature by adopting a processual perspective. Such a perspective has not been widely adopted in the socially-responsible supply chain field to date (van Bommel, 2011) despite its relevance when exploring how the transition towards more responsible practices unfolds in an inter-organisational context, where problems of understanding are

common (Vlaar et al., 2006) and the key role of promoters of new ideas and novel practices becomes apparent (Gutierrez-Huerter O et al., 2020).

This paper first outlines relevant literature on ethical issues in strategic supply management before describing the measures implemented against workforce slavery in the case of the UK construction and facilities management sector. The analysis is structured using Tuckman's (1965) conceptual model of group development, with best practice and benchmarks for tackling the issues of slave labour in business operations and supply chains identified. In the discussion, we attribute the points raised to Gold et al.'s (2015) framework on modern slavery in supply chains, featuring the major constructs of detection, remediation (see also Stevenson and Cole, 2018), capabilities and institutional context. The paper concludes by highlighting the implications for theory and management practice.

Ethical Issues in Strategic Supply Management

Ethical issues in strategic supply management have been largely discussed through the marketing lenses of customer impact or corporate social responsibility (CSR) (Lund-Thomsen and Lindgreen, 2014) and are linked to the concept of corporate citizenship that grants companies social, civil and political rights and duties (Matten and Crane, 2005).

Carter and Jennings (2004) argue that procurement departments are key for implementing culture change towards social responsibility in supply chains as they translate corporate 'talk' into visible action that can be recognised externally, by suppliers, but also internally by employees in the buying organisation. They also identify the need for authentic credibility by the managers driving social responsibility in the procurement organisation, particularly the importance of individual procurement employees' values. Carter and Jennings (2004) further highlight debates within the literature on whether governments should promote social responsibility in procurement through regulation. The results of their study of UK firms does not support regulation as a driver for social responsibility in procurement but they encourage further research into sustainable procurement within systems of well-designed government regulation.

In recent years, we have witnessed the emergence of collaborative efforts within and across industries to address specific social or environmental issues, particularly at the level of supply chains. These multi-stakeholder initiatives or consortia often bring together large companies, which may be competitors, from a sector and other actors, such as NGOs, as a way to develop joined-up thinking or solutions (Roloff, 2008) and offer new modes of supply chain governance through certifications or standards (Xu et al., 2016).

Frequently multi-stakeholder initiatives, these institutions aim to govern complex and global multi-tier supply chains (Mena et al., 2013). Wilhelm et al. (2016b) characterise these multi-tier supply chains and identify the difficulties for buyers to implement sustainability in the supply chain due to supply chain complexity, institutional distance, transparency, tier 1 sustainability management capability, and buyer-supplier power asymmetries. They conclude that within these categories diverse and often unique real-life supply chain realities exist that require in-context investigations and post-hoc considerations of transferability to other supply chain realities.

Forming alliances has predominantly been researched from a power perspective to achieve a bargaining advantage (Chae and Heidhues, 2004). Using this bargaining power to push sustainability

implementation in the supply chain is, however, only one of Wilhelm et al. (2016b)'s multi-tier supply chains classifications and appears embedded in a traditional understanding of supply chain power (e.g., Kraljic, 1983). The reach and effectiveness of (coercive) power-based diffusion beyond the first-tier supplier is hampered by information asymmetries (Wilhelm et al, 2016a) and network asymmetries (Gold et al., 2020), which often implies that suppliers have to be lifted "on board" by the privileges and developmental potential (Yawar and Seuring, 2017) of strategic buyer-supplier partnerships (Pagell et al., 2010).

Multi-stakeholder initiatives or meta-organisations are a popular means for governing multi-tier supply chains, as in the early case of the Roundtable of Sustainable Palm Oil (von Geibler, 2013; Carmagnac and Carbone, 2019). Intra-industry alliances can be considered a particular type of multi-stakeholder initiative. These intra-industry alliances combine not only buying power but also align jointly held interests and coordinate their implementation. Canzaniello et al. (2017) investigate a strategic alliance of buyers addressing sustainability risks in their suppliers. Their results show an orientation towards streamlining processes, standards, and reporting infrastructure across the membership of the initiative and development of risk reporting capabilities particular in the non-strategic supplier base. Beyond the efficiency gains for its members, a standardised approach eases the facilitation of sustainability implementation on the supplier side as it reduces conflicting requirements from multiple customers and fosters learning in sub-tiers of the supply chain (Lechler et al., 2019).

Despite some evidence on the systemic shortcomings of government regulation of modern slavery (Fransen and LeBaron, 2019), legislation is often called for to get companies engaged at all (Christ et al., 2019). In the UK it was indeed the introduction of the UK Modern Slavery Act that rapidly increased corporate attention to the topic of slavery in supply chains. One of the main ambitions of the Act was to raise awareness about the unlawful existence of modern slavery. A key challenge for companies implementing changes to practice in response to the Modern Slavery Act is the limited visibility that they have (Carter et al., 2015) not only of their own operations but also of their multi-tier supply chains (Mena et al., 2013). Although actors with weaker ethical practices are expected mainly in the parts of the supply chain located in developing countries, slavery may also occur within an organisation's own operations and supply chains in developed countries (New, 2015).

For affected companies, new legislation like the Modern Slavery Act combines the risk dimensions of reputation damage and adverse consumer reaction with a need for compliance to avoid potential litigation. Policymakers often ascribe the role of policing global supply chains to multinational companies (Gold et al., 2015). Reporting regulations and legislation—written for example into financial legislation in the US Dodd-Frank Act or the Revenue and Taxation Code or a combination in the case of the California Transparency Act (New, 2015)—are first and foremost targeted at encouraging informed consumer decision making. The UK Modern Slavery Act adopts a similar approach. Most relevant for businesses is its transparency in supply chains provision which requires all commercial organisations with an annual turnover of more than £36 million that undertake business in the United Kingdom to produce an annual modern slavery and human trafficking statement. Although Government guidance recommends the inclusion of certain topics (for example supply chain structure and modern slavery policies), the Act does not establish or require that companies follow a specific reporting standard. The Secretary of State can enforce action to comply with the Act through an injunction, however it is noteworthy that such action has never been taken

yet despite widespread noncompliance (e.g. Phillips and Trautrims, 2018) and that the monitoring and enforcement of compliance with the Act has been left largely to civil society and customer pressure.

In many organisations, procurement departments engaged in sourcing and supply activities represent the key function to manage and mitigate risks in the supply chain (Roberta Pereira et al., 2014). Understanding where risks are located in the supply chain, together with how likely and impactful their occurrence is going to be, are key outcomes of risk assessments, which also impact decisions about which risk management and mitigation activities to put in place (Manuj and Mentzer, 2008). Locating and evaluating the risks for slavery in an organisation's operations and supply chains is therefore the first step in devising an operational response to the risk of slavery (Pinheiro et al., 2019).

Although one also finds slavery in local and regional production, generally speaking, global businesses and supply chains are more prone to slavery than localized supply chains. This is reflected by the tenet that global scale operations significantly increase risks and vulnerability to focal companies (James, 1990) and large companies are more exposed to reputation damage (Oelze and Habisch, 2018). Nonetheless, comparative cost advantages and other benefits related to global business may seem to outweigh the risks stemming from the increased distance, complexity and fragmentation of supply chains (Steven et al., 2014). Although risks can be addressed and reduced significantly in the product and supply chain design phase, supply chains may have grown organically or be deliberately created without thorough mapping and risk assessment (Manuj and Mentzer, 2008). The risks involved tend to be considered and managed only at a later operational stage instead of being considered, avoided, or mitigated at the design phase (Khan et al., 2008). While previous research has concentrated on economic and environmental risks (Christopher et al, 2011; Foerstl et al., 2010), ethical supply chain risks and their measurement and inclusion in procurement considerations are far less well researched (e.g. Bai and Sarkis, 2010; Klassen and Vereecke, 2012; LeBaron et al., 2017). In the section that follows we give an account of research into an intra-industry project involving a number of managers from major, market-leading UK companies in the construction and facilities management sector and their building materials' suppliers, as they faced the stipulations of the UK Modern Slavery Act.

Developing an intra-industry alliance: The Case of Construction and Facilities Management in the UK

An already established shared sustainability alliance was used as a base for setting up a new, time-limited alliance on modern slavery, since participating companies favoured a sector-wide response to the challenges of the Modern Slavery Bill. Therefore, tackling slavery in the construction sector required the provision of education material and guidance for training employees at all supply chain stages under leadership of the larger first-tier contractors and material suppliers.

In the construction and facilities management sector, the main contractor usually subcontracts major parts of its project operations. The risks for modern slavery lie both in the provision of labour and in the sourcing of materials but weightings differ depending upon the business and its role in the supply chain. In the echelons of first-tier contractors and materials supply, activities are rather concentrated among a small number of large corporations. Between these two stages, there lie a relatively large number of small and medium sized actors, who select their own suppliers and subcontractors independently. This makes construction supply chains complex and difficult to monitor. Regionally specific subcontractors are usually contracted on a per-project basis as the cost for travel and accommodation makes it uneconomical for a subcontractor to engage in projects further afield.

Construction and facilities management sites are scattered across the country and often hard to control for headquarters functions. Furthermore, as the sector's workforce contains relatively high proportions of migrant workers, employment through agencies and various models of self-employment, increase the risks of labour exploitation. The sector often faces shortages for specific skills and trades that make it difficult to find subcontractors or impose intense due diligence on them, while lower skill areas of the sector pay at minimum wage levels.

Research methods

This research utilised participative or engaged research methods where the researcher becomes part of the researched phenomenon. Methods that embed the researcher within the research setting and allow interaction and retrospective accounts at multiple points in time are particularly recommended for investigations of supply chain sustainability research (Touboulic, et al., 2018; Soundarajan and Brammer, 2018). This type of approach belongs to the family of 'action research' (Reason and Bradbury, 2006). Action research aims to contribute to change and is situated in projects that stimulate change in joint collaboration between researcher and organisations (Checkland, 1993; Näslund et al., 2010). Our study was guided by the need to understand the emergence and orchestration of collective action around ethical sourcing, and modern slavery in particular. The adoption of a participative approach provides access to insider knowledge of the intricate process of driving change for sustainability (Lüsher and Lewis, 2008; Meehan et al., 2016), and has been used for research on modern slavery lately (Benstead et al., 2018).

A key challenge of participative and engaged research approaches is the spread of data collection beyond a single point in time and across different types of data (Langley, 1999). In our research setting, senior managers in sustainable procurement established understanding, practices, and norms for the new phenomenon of modern slavery that they did not have to address previously. We combined data from interviews with the most actively involved group members, meeting minutes from each group meeting which were collectively approved, and the final guidelines report as a collectively agreed output by intra-industry alliance group members. Such triangulation of data sources mitigates observational error or bias thus increasing reliability and internal validity of the findings; at the same time triangulation facilitates a more complete portrayal of the phenomenon under investigation (Flick, 1992).

The interview transcripts were analysed by the lead researcher, who attended the group meetings and conducted the interviews, firstly using open coding. The interview and document data were then coded – using the initially developed codes - by another researcher, who did not take part in any of the meetings or interviews. The second step led to the identification of some new codes, subcodes and to the development of a more refined coding tree (see Table 1).

The participation of the researchers in the intra-industry alliance group ensured that data sources could be interpreted from the participants' view and also allowed capture of the 'soft data' related to debates and results (New and Payne, 1995). The researcher's involvement bridges the gap between practice and theory and contributes to avoiding the development of separate narratives (Starkey et al., 2009; Hodgkinson and Rousseau, 2009).

Reflexivity is an integral part of action research and serves to fully address the question of the researcher's embeddedness within the research phenomenon. Beyond the skills needed to stimulate

participation, it is necessary for action researchers to reflect on their own practice. While more quantitative research focuses on questions of reliability and validity, the quality process in action research is more context-bound. The involvement of the researcher in a cyclical process of preparation, participation and reflection guarantees the quality of the research (Näslund et al., 2010) and making their choices and the research process transparent should ensure quality. A reflective account is included in the discussion section of the paper to address this.

Findings

Aiming at the extraction of the views of managers who were positioned within the problem situation, in the next section we use Tuckman's (1965) model to illuminate how the group developed its response to the Modern Slavery Bill. Tuckman proposed a four-stage model of the development stages of a group setting and its task activities over time. Developmental stages related to the motivation for forming the group, storming the respective challenges, the development of norms related to the identification of risk hot spots and group consensus relating to collaboration, the adaptation of procedures, the introduction of countermeasures and education and training that realise group performance are identified and portrayed, together with nodes, descriptions and examples in the coding tree in Table 1.

Forming: motivation of group representatives

The participating companies in the alliance came from different segments of the UK construction sector, but all were from the downstream end of the construction supply chain and were market leaders of their segment. The group included construction project companies (housing, commercial property, infrastructure), facilities management providers and materials suppliers. The group was hosted by a shared sustainability organisation for the construction sector of which the companies were members already. However, membership of the alliance on modern slavery was not mandatory, but a result of each member's own motivation. The alliance focused mainly on the UK part of their operations but also considered overseas activities in sourcing. Overseas construction projects were only considered to a minor extent as not all companies engaged in such activities and those who did ran them in legally separate entities.

As the construction sector tends to operate through multiple tiers of often small or medium sized contractors, representatives from the participating companies aimed to establish guidance and leadership for their supply chains and their sector as a whole. The ambition was hence to go beyond legal compliance with the Modern Slavery Act and to aim for a more substantial development of the supply chain. In this sense, the sector aimed to eradicate modern slavery from their operations and supply chains, taking into account the limited resources of their small and medium sized suppliers. Mere compliance would have been relatively easy to achieve for the participating companies since the law mostly stipulates reporting duties.

From the very establishment of the alliance, representatives from the participating companies expressed the ambition to use the group for more than solely legal compliance. Although the Modern Slavery Act had triggered the genesis of the group, the participants all stated that the risk of reputational damage and public exposure of their organisations was larger than the legal risks from non-compliance with the Modern Slavery Act. The strength of this point increased over time as the group worked through the legal implications and compliance requirements of the Act.

Development stage	Node	Descriptions	Illustrative quote
Forming			
Motivation	Business	Ability to win work, cost considerations	[…] Did it affect their costs? Yes because they spent a lot of management time running around trying to do stuff which they should have probably been doing anyway. [Interview 4]
	Ethical	Beyond legal compliance	I think as a company we have a moral obligation to address, the issue. [Interview 3]
	Industry Leading	Taking leadership positions on the issues, innovating responses	We like to be seen as leading on a range of different issues and we just saw it as something that we wanted to proactively manage. It wasn't in response to kind of any perceived negative threat. We saw it as an opportunity to do something positive. [Interview 1]
	Legal	Obeying the law, avoiding prosecution	[…] if it hadn't been the legislation, I don't think we'd be doing anything different today to what we were doing for right or wrong. [Interview 2]
	Reputation	Press and public perception	The reputational impact if we find someone on our site is the biggest for us. So that's why there is that focus there. [Interview 2]
Storming			
Challenges	Inadequate Systems	Complexity of Supply Chains, lack of detection mechanisms, technological deficiencies	[…] the construction supply chain's very complicated and long and convoluted. So it does make that kind of accountability and responsibility quite difficult to follow. [Interview 2]
	Market	Supply and Demand, Purchaser and Buyer negotiating power	[…] challenge with ethical sourcing is that it puts more onus on us. We're asking more questions. We're interrogating. And they're in a position at the minute to say, 'We're just not going to work for you'. There's so much work out there that they can just turn around and say, 'We're not going to work for you. We'll just work for someone else.' [Interview 2]
	Ownership of Issue	Both internal and external stakeholders	[…] at the minute it's owned by legal, but part of what she's doing is incorporating what we're doing and incorporating what others are doing. […] Legal are leading on it but they're working with lots of different parts of the business to kind of pull that together. [Interview 1]
Norming			
Risk Hot Spots	Geographical	Cultural differences, workers from abroad, geographical prevalence of Modern Slavery	we can't put the rights or the wrongs of all India business, […] we're not big enough. […] So what you need to do is to understand the issues, understand the risks of those issues and prioritise what you can actually do to amend, fix, shape, those issues. [Interview 4]
	Responsibility of Detection	Both within the organisation but also external bodies (Border Agency, Police)	[…] business isn't the policeman. […] there's a piece that's not been properly funded and I think in a sense the Government wants to shift the cost on to business […] there's a limit to what business can do as being the- Yes you can do checks, you can do da-da, da-da, da-da, but you aren't the policeman. [Interview 3]
	Position of Risk	On-site, Sub-contractor, Supply Chain, etc.	[…] we're buying stuff from a big company who then goes to a small company and then there's slavery happening here, it's so diluted by the time it gets to us, it's very difficult and I

			think it's the length of the chain that makes it challenging. [Interview 2]
Performing			
Response	Adapting Procedures	Updating and adaptation of pre-existing documents (Code of Ethics, Contracts)	the approach we've taken as a UK-based company employing UK contractors and going down the route of building into the PQQ tender, do they check employee rights to work in the UK, focus on the CSCS cards [Interview 2]
	Countermeasures	New systems and checks: Auditing procedures, Schemes	We've started to roll out awareness campaigns. When we're doing the audit outside the UK now [...] modern day slavery will be on that agenda and this is about sort of raising awareness in the supply chain of, 'This is the legislation that we have in the UK. This is what we need to implement. [Interview 4]
	Collaboration	Intra-industry, NGOs, Other agencies (e.g. Ethical Trading Initiatives)	[...] we engage in that because we were engaging in these other businesses or organisations. Why were we involved in these other organisations, because we felt that [...] these were not coming without issues [...] and obviously joined organisations where you could collaborate and share work and thinking and then make it appropriate to your organisation. [Interview 4]
	Education and Training	Both within the organisation and externally	We wouldn't drop a supplier. We'd work with them. We did some audits recently and we didn't identify modern slavery but we've identified a gap in their audit process and so we're just working with them to improve that. [Interview 1]

Table 1: Coding tree

A consultant legal adviser produced guidance for the group on legal compliance with the Act and acted as an anchor for questions on legal perspectives and interpretation of the Act. Since for many suppliers the initial worry when facing the topic of modern slavery was legal compliance, this issue was taken very seriously. However, whereas the first meetings were dominated by the legal aspect of modern slavery, the proportion of non-legal aspects increased continuously over the year.

Storming: the challenges of intra-sectional interests

Although the participating companies all looked at the same ethical issue of modern slavery, they had very different perceptions of what the topic meant for their businesses' supply chains and of the selection of suitable response measures. In the early meetings of the alliance many representatives were uncertain whether they were going to remain the representatives of their organisations. The positioning of the topic in a business function and its 'ownership' was often not finally decided as many business functions were engaged in various aspects of the topic.

As the risk of modern slavery was located at different supply chain echelons, the response mechanisms were equally diversely located within the organisation. It was commonly agreed that response mechanisms had to be attached to already existing processes and that the avoidance of new structures was important for the efficient execution of any modern slavery measures. The debate on response mechanisms therefore always considered what existing structures were already in place. Similar structures were in place across all businesses and all representatives agreed that the group needed to produce output that could feed into risk assessments as everything else in the operational response would be triggered from the initial corporate risk assessment.

The discussion related to what functions would be involved in the response to modern slavery was aligned with the initial discussion on where the risks lay. Depending on where the risk of modern slavery entering the supply chain was located, the business functions involved varied.

The facilities management companies focussed mainly on human resources processes as their key risks were related to the use of external agency labour on site or even the direct recruitment of an enslaved person. Companies were legally required to check workers' rights to work in the UK – a process which was overseen by their human resources departments – and checks were added to ensure that the worker was not enslaved. Despite these procedural advances, barriers remained.

Some agency suppliers served customers worldwide and might not see a need to comply with the reporting obligations of the UK Modern Slavery Act and UK customer requests for information. Other suppliers needed to be developed to acceptable standards of modern slavery detection and avoidance through capacity building.

Although the companies developed guidance for their supply chains and their sector in general, there was no obligation for the participating companies to adopt them or enforce them as an industry-wide standard. As every participating company had its own legal advisors, sustainability strategies and supply chain design, it was deemed impossible to agree on an industry-wide standard at the risk of ending up with an overly general standard satisfying only the lowest denominator that might not be meaningfully combatting modern slavery. As the companies' ambition was to go beyond legal compliance, individual company and supply chain context prevented a one-size-fits-all.

Furthermore, companies were limited to how strongly they could push their supply chain partners for antislavery measures in the supplier selection process as suppliers and subcontractors were – despite the size and market share of the downstream companies – not always in a weaker negotiating position. An overseas supplier to whom a UK contract may only propose a small opportunity in its worldwide business might decide not to bother bidding for a contract that came with a too strenuous a pre-qualification questionnaire and extra effort. Also, domestically, a shortage of bricklayers and other skilled construction trades could lead a subcontractor to bid only for contracts that came with fewer additional compliance efforts. The group decided to produce a guide that translated the Modern Slavery Act into actions that suppliers needed to undertake to achieve at least compliance.

Norming: identifying risk hot spots

Over several meetings the group participants realised that their self-assessment of how to identify and avoid the risk of modern slavery varied between them. After repeated discussions on the key areas where slave labour enters the supply chain, individual risk hot spots crystallised: own operations, supplier on-site, supplier off-site, and the materials supply chain. These risk entry points were closely related to the companies' business models. For the materials suppliers the risk of modern slavery was predominantly in the materials that they source from many suppliers, often from overseas. For them the risk became mainly a procurement and supply chain auditing activity with an inclusion of modern slavery in their procurement code and in sourcing risk assessments.

For the representatives from facilities management providers the main risk area was the sourcing of workers from external labour agencies. These workers were brought on-site and would operate under the facilities management provider's brand. Contracts with the labour agencies would include vetting

procedures for the workers supplied and an exclusion of further subcontracting. However, it was hard to ensure that such subcontracting was not used, and the providers relied on the labour agencies' vetting accuracy. As UK immigration laws require employers to check for the right to work in the UK, such vetting procedures were already well established in the human resources management function and could be used to check for modern slavery risks too. Other procedures such as the use of payroll data, residency data and legitimacy checks were already widely established to avoid potential violation of immigration law. Such procedures had to be enhanced for the inclusion of checks on modern slavery but did not require entirely new procedures. Nevertheless, due to the large numbers of externally sourced workers, the likelihood that a slave could be brought onto site was still perceived as significant and the potential reputation damage higher than if such a situation occurred in a more remote tier of the supply chain.

The construction companies' representatives faced both materials and labour risks. The construction companies mainly engaged in the planning and execution of large construction projects by using multiple subcontractors who would equally subcontract some of the work further. Most of these subcontractors would arrange for sourcing their own materials unless specified otherwise by the construction company, thereby introducing new materials and labour risks for every new subcontractor-tier. The risk of modern slavery was further differentiated between subcontractors who operated on-site and those who operated off-site, i.e. pre-building parts on the subcontractor's site nearby and then bringing them onto the construction site.

Performing: formulating procurement guidance

Structuring its advice along the procurement process, the group developed procurement guidance that started with mapping the supply chain, assessing it for the risk of modern slavery entering the supply chain, pre-qualification exercise of supplier questionnaires checking for supplier capabilities and for reasons for mandatory and discretionary exclusion, inclusion of antislavery measures in the contract, auditing of managerial systems and performance against supply chain transparency and control, and eventually potential supplier development if necessary (see Figure 2). Although the materials suppliers used such human resources checks for their own employees and for contract labour in their operations (for example cleaning contracts at their headquarters), their main focus was on their suppliers, in particular their overseas suppliers. The main challenge for materials suppliers was that they used many specialised suppliers and often sourced products through wholesalers or other middlemen. Response mechanisms here were mainly in the procurement and supply chain functions and involved amending procurement codes, supplier selection processes (in particular supplier pre-qualification questionnaires) and supply chain mapping and auditing. The materials suppliers however also wondered about the need for customer education: reaching those who would usually specify a particular material without knowing about the material's exposure to modern slavery and also without being willing to pay a premium for materials sourced from a lower risk country of origin. Figure 1 illustrates the procurement and supplier management processes on which the group focussed. The dotted area covers the procurement due diligence process, the lined area covers supplier management which requires continued cooperation with suppliers.

Figure 1: Procurement Guidance for Combatting Modern Slavery
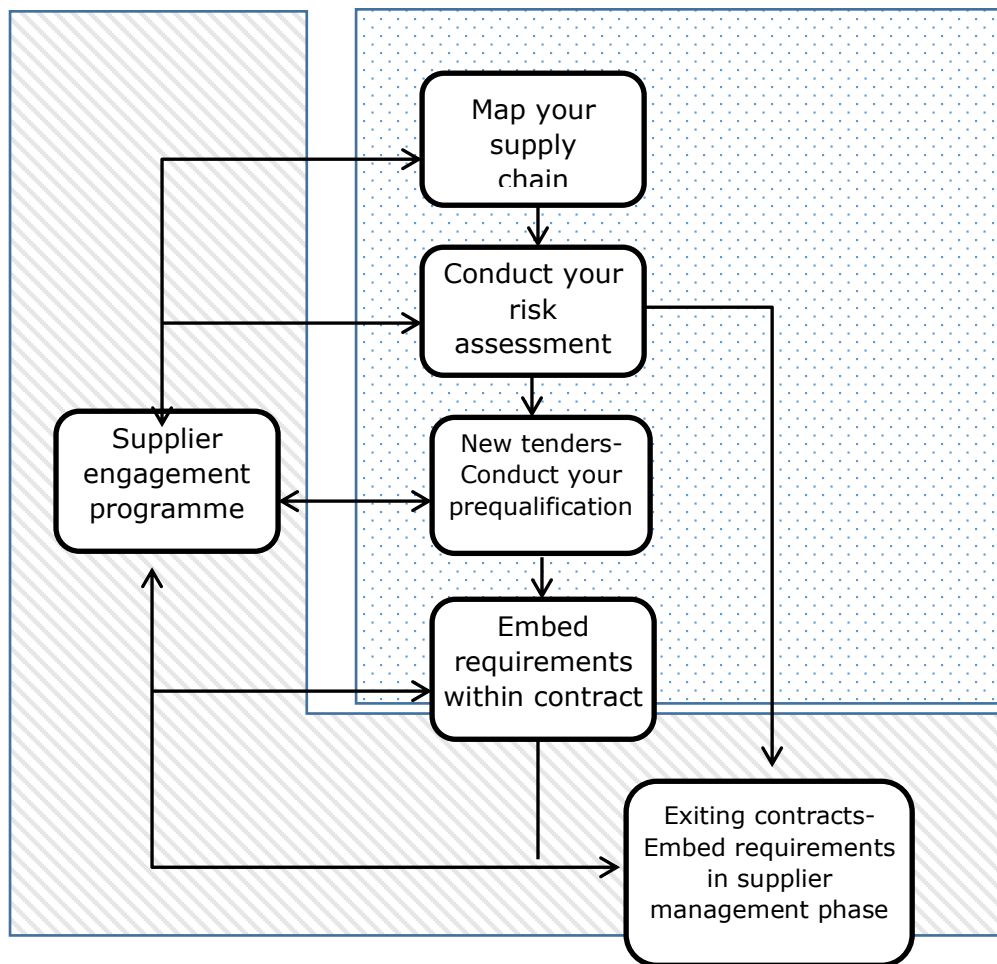
Adapted from: Supply chain sustainability school (2016) Supply chain sustainability procurement guidance

The construction companies began to adopt the human resources, procurement and supply chain amendments upon which facilities management and materials suppliers focussed. Additionally, they faced the challenge that they were largely project management organisations with most of the actual building activities subcontracted to small and medium sized companies. These subcontractors would also change from project to project with much less supplier continuity than in other industries. Subcontractor workers had to go through a vetting process before they were allowed to enter a construction project site. The vetting process was conducted through the health and safety function. The off-site activities of subcontractors were much harder to control and had to be addressed through supplier selection and education.

To summarise, legal compliance with the Modern Slavery Bill was relatively easy to achieve for suppliers and subcontractors. Going beyond mere compliance however, guidance, education material and risk assessment support tools were developed by the group which could be adapted by anyone in the supply chain and were developed with less resourceful small and medium sized subcontractors

and suppliers in mind. Education and awareness raising in the supply chain were key to substantially detect and reduce modern slavery.

Discussion

Although within the same area, our investigation of an intra-industry initiative is different to the investigations of intra-industry strategic alliances by Lechler et al. (2019) or Canzaniello et al. (2017) as the shared intra-industry sustainability alliance in our study was already well established and membership agreed at the board level of each member's company. As part of their existing membership in the shared sustainability alliance, representatives from each member company could join the modern slavery subgroup at their own volition.

This pre-existing intra-industry body, through which companies jointly worked on sustainability topics in the construction and facilities management sector, provided both a crucial infrastructure and trusted relationships. This may explain why, when compared to other high-risk sectors of the UK, construction and facilities management has been taking a frontrunner and leadership role in the eradication of modern slavery. Furthermore, a starting point of motivated individuals with an ambition to challenge modern slavery beyond legal compliance with the Modern Slavery Act confirms Carter and Jennings' (2004) study and underpins the need for the engagement of professionals who understand their sector and its context. It further raises the need for increased involvement and responsibility of professions, their regulatory bodies, and the widening of antislavery responsibilities to include both professional bodies and legislation such as the Companies Act which delineates the responsibilities of company directors.
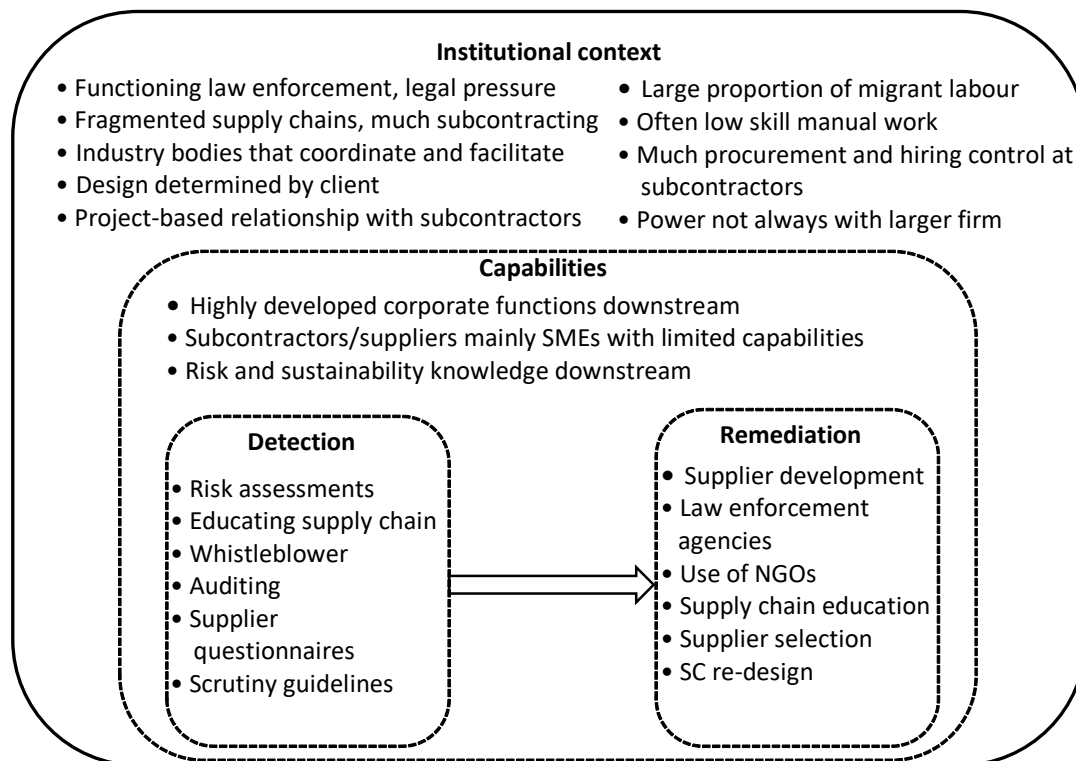
Furthermore, it must be highlighted that a relatively small group of the overall construction and facilities management companies with a duty to comply with the transparency of supply chains clause of the Modern Slavery Act were participating in the intra-industry initiative. Although the Act had certainly encouraged that engagement, a much larger number were not engaged in the initiative, showing the limitations of the Modern Slavery Act in driving business engagement on modern slavery. The absence of penalties under the Modern Slavery Act for non-compliance weakened the argument that managers were making in their organisations and emphasised even more the need for personal motivation of the managers as promoters of antislavery engagement as well as backing and resonance from and within their member organisations (cf. Gutierrez-Huerter O et al., 2020). This motivation may not be present in other sectors and one could debate whether the exposure of the construction industry to modern slavery through the Qatar World Cup may have caused earlier and more advanced sensitivity towards modern slavery that created a stronger motivation and willingness to take action.

Our analysis found that remediation for these businesses was limited to avoiding modern slavery or reporting it. The eradication of slavery as a social and societal challenge was not in their remit of business expertise and would require substantial capacity building. This aligns with New's (2015) suggestion that modern slavery –exemplary for similar social sustainability issues- shows the limitations of CSR in supply chain practice. The focus of these businesses' representatives was to protect the reputation of their organisations and to keep their supply chains free from slavery amongst other ethical risks; they were not dedicated to resolving a particular issue outside of their business model and value proposition. This goes some way to contradict concepts such as corporate citizens (Matten and Crane, 2005) and issue-focussed stakeholder management (Roloff, 2008) that advocate

business 'noble engagement' in complex social causes beyond their direct business interests and might, instead, be attributed to the business-focussed nature of the intra-industry alliance.

Figure 2 below illustrates the context of the UK's construction and facilities management sector. With many actors involved in the sector's supply chains, antislavery capabilities existed in different tiers of the supply chain and were not widely spread across the sector.

Figure 2: Structured view on Modern Slavery in the supply chain of the UK construction and facilities management sector

Institutional context
- Functioning law enforcement, legal pressure
- Fragmented supply chains, much subcontracting
- Industry bodies that coordinate and facilitate
- Design determined by client
- Project-based relationship with subcontractors
- Large proportion of migrant labour
- Often low skill manual work
- Much procurement and hiring control at subcontractors
- Power not always with larger firm

Capabilities
- Highly developed corporate functions downstream
- Subcontractors/suppliers mainly SMEs with limited capabilities
- Risk and sustainability knowledge downstream

Detection
- Risk assessments
- Educating supply chain
- Whistleblower
- Auditing
- Supplier questionnaires
- Scrutiny guidelines

Remediation
- Supplier development
- Law enforcement agencies
- Use of NGOs
- Supply chain education
- Supplier selection
- SC re-design

Adapted from: Gold et al. (2015)

Contextualisation had a large effect on understanding the response of businesses towards modern slavery: The fragmented supply chains in construction and facilities management were hard to control and the discontinuity of relationships, with little ambition on either side to maintain a relationship beyond completion of a project, reduced both the power of the customer and the opportunity to yield power through repeat-business. This supports Lechler et al. (2019) who see requirement confusion as a barrier for sustainability improvements in sub-tier suppliers. It is certainly an interesting question under what circumstances ethical risks such as the risk of slave labour might be perceived impactful enough to change the project-based short-term *modus operandi* within construction and facilities management toward long-term relationships. The mostly "soft law" approach of the UK Modern Slavery Act does not push companies hard enough in this direction (Fransen and LeBaron, 2019).

Researcher's reflections

Much of this study is based on data from interviewed managers, meeting minutes and documents. The researcher's and the practitioners' reflexive input into the data and the project cannot be ignored

as their social world is entwined with the account of experience (Cunliffe, 2003) and requires structured reflection (Sannö et al., 2018).

All participants were from similar levels of seniority and all worked in the same sector, and therefore a joint language was already in place and did not need to be established. All companies operated similar processes in which the modern slavery response could be embedded which made collaboration much easier. The researcher's involvement was as a neutral source for information and reflection. Information was provided about modern slavery as a phenomenon and knowledge transferred about modern slavery from other research disciplines into the business procurement context, a process that was facilitated by the commercial and procedural operations background of the group. The researcher also acted as a catalyst for reflection and as a subject expert from outside the sector. The researcher's involvement and reflection did not threaten group cohesion as the aim was knowledge creation and the interests of researcher and industry participants were not in conflict. The academic was as much a learner as the industry participants.

Based on the researchers' reflections, experiences of 'what worked' in this initiative and what can be considered as recommended actions and potential best practice for adaptation within future initiatives in other sectors, or on other human rights topics in the same sector, are presented and proposed in Table 2. The table follows the same structure as the coding tree in Table 1.

Development stage	Theme	What worked
Forming		
Establish mission and common goal for the alliance	Business	Antislavery engagement not a competitive aspect
	Ethical	Clarity on the ambition and goal of the group
	Industry Leading	Acceptance of leadership responsibility, members know level of support and resources within their organisations, support by leadership of member organisations
	Legal	Learning about the legal framework, clarity on the limits of collaboration (for example not talking about individual suppliers or prices)
	Reputation	Active engagement against modern slavery and frank conversation about challenges and missing knowledge and capabilities
Storming		
Understanding and addressing challenges	Inadequate Systems	Understanding why modern slavery is currently a problem in the sector, understanding why current mechanisms are insufficient, learning about modern slavery, learning how modern slavery enters the supply chain
	Market	Mapping other actors and their influence as a driver or barrier, creating routes to influence other sector stakeholders, awareness that joint language and consistent communication between members and their supply chains strengthens each other's influence and increases likelihood of adaptation
	Ownership of Issue	Willingness to 'own' the topic in the organisation, establish cross-functional teams in the organisation
Norming		
Bringing modern slavery knowledge to the sector's operational practices	Geographical	Migrant workforce patterns, regional prevalence in UK construction, prevalence of modern slavery in sourcing countries
	Responsibility of Detection	Both within the organisation and including external bodies (Border Agency, Police), collaboration with a range of state and civil society actors
	Position of Risk	Differentiation of modern slavery on-site, and at contractors, labour providers, materials supply chain
Performing		
Implementation of measures	Adapting Procedures	Incorporating modern slavery into existing documents (supplier code of conduct, recruitment, HR checks, whistleblowing)
	Countermeasures	New systems and checks: Inclusion in auditing procedures, workforce auditing, right to work on site, document checks, mandatory site induction
	Collaboration	Making use of antislavery NGOs infrastructure (modern slavery helpline) and resources, interaction with authorities, professional bodies, auditing bodies, exchanging intelligence and case experiences
	Education and Training	Identifying who needs training on modern slavery in the organisation, designing training material for contractors and supply chain, make use of existing training infrastructure

Table 2: 'What worked' and recommended actions

The project was compressed by a clear timeline caused by the passing of the Modern Slavery Bill into law in the UK. This legal pressure could be seen in the focus on supplier due diligence instead of supplier management activities. Although there was a difference in the levels of commitment to the project, a large number of participants engaged and contributed strongly as they all had similar knowledge needs that participation in the project addressed. This aligned interest helped the work speed of the group. There was however a moment when the early engaged companies were not willing anymore to start from square one every time a new company joined the intra-industry alliance and it was agreed that new joiners had to read up upon what had already been decided by the group to avoid a slowdown in progress. This is very different from the usual engagement in other groups of this community and can be related to the practical need for the project output to a particular deadline.

Individual participants were motivated by a personal affinity to sustainability-related topics and the ambition to own the topic of modern slavery to prevent it from becoming a pure compliance topic without operational effect. The topic was also new to construction and several larger participating companies were caught in scandals surrounding the construction of the Qatar World Cup, leading to

a clear organisational need to understand and handle the topic of modern slavery operationally. This desire for practically useful and implementable knowledge overlapped with the researcher's background in impact research, removing some of the usually occurring barriers in industry-academic collaboration.

Conclusions

Addressing Sustainable Development Goals such as the requirement to provide decent work requires a co-ordinated business response. Drawing upon original research data which charts the development of an intra-industry alliance, a particular type of multi-stakeholder initiative, within the construction and facilities management sector, this paper uses Tuckman's (1965) group development model to investigate the managerial development of an antislavery response by organisational representatives and brings a processual view to the academic conversation on how to improve the ethical performance of supply chains and, thus, contributes to our understanding of sustainability as a supply chain practice. The time compressed initiative went through clarifying its motivation, identifying the challenges of modern slavery and risk hot spots in sectoral supply chain operations, and the development of implementation guidance which built upon existing business processes.

This construction and facilities sector initiative provided a rich setting for investigation and allowed the extraction of specific contextual supply chain factors, for example the nature of supply chain relationships, the limitations of procurement power, the perception of risk to the organisation and its location in the supply chain, and the involvement of multiple organisational functions in the organisation's response to modern slavery risks. The study confirms Wilhelm et al. (2016b)'s view that consideration of context is crucial in supply chain sustainability research and that complexity at a tier 2 level makes diffusion of sustainability less likely, henceforth strengthening the need for buying organisations to collaborate and educate their supply chain in such settings.

Beyond legal compliance, the starting point for a successful intra-industry alliance against modern slavery must be the desire to fight modern slavery. Although legislation can be a catalyst for the provision of resources and corporate support, its effectiveness rests on the involvement of motivated individuals with knowledge of the sector. This may explain the gap between sectors in antislavery work and shows the weaknesses of the UK's Modern Slavery Act and its dependency on corporate and individual goodwill.

Even if all companies come from the same sector, a one size fits all approach does not work, as companies are positioned at different tiers of the supply chain, have different roles, business models, risk exposures, and capabilities amongst many other variations. Despite these differences that require a tailoring of the antislavery response to the individual organisation, shared understanding, language, community, and existing relationships between members turned out to reduce the barriers and time needed to make such an intra-industry initiative working.

Whilst our study remains within the current setting of the UK construction sector and its currently dominating business model framework, it does not discuss whether this business model framework itself systemically incentivises unsustainable behaviour in the supply chain and whether a more fundamental reorientation of the current business model framework may be required. The companies involved in the initiative focussed on the integration of antislavery measures in existing processes and avoided substantial investments in new infrastructure. Pushing for such investments would have

accentuated the tension between profits and ethics and thus increased resistance as those companies involved were already spending more on sustainability improvements in the sector than their competitors who were not members of the initiative. Referring to a real option approach, recent research has explained companies' non-investment in sustainability measures with low opportunity costs for postponing such investments (Cassimon et al., 2016). In this regard, the authors argue that governmental policymaking plays a crucial role to incentivize sustainability investments and protect first-movers, for example by reducing uncertainties about the benefits of the investment or reducing investment costs through subsidies. This suggests that a more active role of the UK government could remove barriers for proactive companies and help them strategically integrating ethical considerations into their business model.

The research contributes and expands the research stream of intra-industry alliances, conceived as a sub-type of multi-stakeholder initiative. It confirms that intra-industry initiatives leverage synergies and combined buying power for their collaboration but extends the scope to the implementation level and adds leadership and supply chain education as new key components for such intra-industry initiatives. It strongly supports Carter and Jennings (2004) in their argument that well-designed legal interventions trigger motivation for social responsibility initiatives in companies, further underlining the need for the inclusion of context, for example in terms of market structure, power concentration and organisation size, in future research on sustainability legislation and in the design of legislation. Furthermore, modern slavery guidance and regulation, and action against it, could be tailored to specific sectors, professions, and corporate functions.

The study contains value for practitioners as it was conducted within the supply chain and business context in which UK construction and facilities management companies operate. The initiative took advantage of existing collaboration infrastructure for sustainability improvement and the study therefore enables further work into the possibilities for adaptation of existing social sustainability improvement approaches based upon existing institutional and collaborative infrastructures. In combination with the extraction of the managerial considerations behind decisions, this account and analysis of an intra-industry initiative in construction can be used for the initiation and implementation of antislavery responses and social responsibility interventions more widely through intra-industry groups in other sectors.

The study also advances our knowledge of responding to an ethical issue in the supply chain through various steps carried out in a sector-wide initiative. It adds to academic knowledge regarding ethical issues in supply chain management by raising new considerations of managerial decision-making, for example the location of the risk in the supply chain and the different response depending on the business model and supply chain and procurement circumstances.

Further research is required to investigate the effectiveness of different antislavery measures that businesses are implementing and their impact on business operations and wider supply chain management. Our study also supports the need for more participative and engaged research in sustainable supply chain management scholarship to advance research on the implementation of sustainability improvements in real-life supply chain operations, to bridge the practitioner-scholar divide and to address research questions of transferability from one contextual setting to another.

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Appendix A: Data timeline

We conducted face-to-face semi-structured interviews with the representatives of the four most actively engaged members of the special interest group. The interview durations ranged from 42 to 78 minutes and interviews were conducted towards the end of the project between meeting 4 and 5. Interviewees came from various corporate functions of the participating companies. The participating companies nominated these individuals as they were in overall charge of the response to the upcoming Modern Slavery Act in their organisation. They can therefore be considered to be self-selected by the companies, following a key informant approach. The companies involved and their representatives' functional role are shown in Table 1. All companies were market leaders in their respective area with annual revenues between USD 500 million and USD 11 billion.

	Interviewee 1	Interviewee 2	Interviewee 3	Interviewee 4
Company	Construction company	Construction company	Facilities management company	Construction materials supplier
Job title	Sustainable Supply Chain Manager	Head of Group Sustainability	Sustainable Procurement Lead	Head of Sustainability

Table A1: Interview participants

For additional sources of data, we also used the documentation produced by the special interest group for the extraction of discussion and decision points; the final document, which is a guideline on the implementation of antislavery measures in procurement, and the meeting minutes. These documents were approved by group members. Such triangulation of data sources mitigates observational error or bias thus increasing reliability and internal validity of the findings; at the same time triangulation facilitates a more complete portrayal of the phenomenon under investigation (Flick, 1992).

Time	Event	Data sources
October 2015	First Group meeting	Attendance, notes, minutes
November 2015	Second Group meeting	Attendance, notes, minutes
December 2015	Third Group meeting	Attendance, notes, minutes
January 2016	Fourth Group meeting	Attendance, notes, minutes
	After Fourth Group meeting	Interviews 1 + 2
April 2016	Fifth Group meeting	Attendance, notes, minutes
	After Fifth Group meeting	Interviews 3 + 4
July 2016	Launch	Final document

Table A2: Timeline

The interview transcripts were analysed by the lead researcher, who attended the group meetings and conducted the interviews, firstly using open coding. The interview and document data were then

coded – using the initially developed codes – by another researcher, who did not take part in any of the meetings or interviews. This second step led to the identification of some new codes, subcodes and to the development of a more refined coding tree (see Table 1).