



# ILLUSTRO

TACKLING  
SLAVERY  
IN TODAY'S  
WORLD



## A GUIDE TO OUR BUSINESS TRAINING

We deliver training to understand modern slavery and support legal compliance, with practical steps to address the risk of forced labour in your supply chains.



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# Welcome

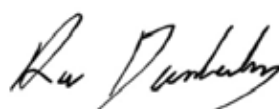
On behalf of Illustro Consultancy Ltd, I would like to thank you for taking your first steps toward learning about modern slavery in supply chains. Since 2017 we have been supporting businesses to combat modern slavery and we continue to develop our training to reflect the latest research and experiences from across the globe.

As you are undoubtedly aware, companies face growing expectations that production will comply with social and human rights criteria.

These expectations have developed into international covenants and partnerships, including the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, the UN Sustainable Development Goals, the UN Global Compact, and now the EU Directive on Corporate Sustainability Due Diligence (CSDD).

As such, modern slavery and wider human rights violations have become important issues for employers, organisations, and businesses. But why is this issue important to your company? Beyond the ethical implications, modern slavery and wider human rights violations present serious financial, legal, reputational, and operational risks to companies if not properly addressed.

At Illustro Consultancy we know the business of modern slavery - but more than that - we understand how to deliver training to those that can prevent it.



**Tony Dunkerley**  
Managing Director



# What We Do



## Training

We train criminal justice practitioners and private industries to investigate modern slavery and prevent forced labour in supply chains.

*"The training was very interactive, with classroom presentations, guest speakers, and mock investigations taking place 'live-time' across Anguilla. The courseware manuals were easily digestible and were presented in a professional manner. Highly recommended ."*

**Paul Morrison QPM MBA Commissioner RAPF, Eastern Caribbean**



## Education

We raise 'beyond awareness' on modern slavery.

*"The Illustro school workshop is extremely important. It helps bring awareness to children and teachers on the risks of human trafficking, modern slavery, and keeping safe online."*

**Mr. Alaku Gambo, Junior Secondary School, Area 11, Abuja, Nigeria**



## Student Support

We support students conducting research on modern slavery.

*"I had reached out to Illustro following a presentation they had given at my university on modern slavery. I was partnered with Tony and he supported me whilst I wrote my degree dissertation. Not only did he take the time to read over the final draft but provided me with feedback and considerations for improvement. It was great to have Tony by my side during this time and I would not hesitate to contact Illustro again in the future."*

**Molly Lloyd, BSc. (Hons.) Sociology, focusing on modern slavery in healthcare settings**





# What We Do

Illustro Consultancy Ltd provides international training, investigation, research support, and educational services to criminal justice practitioners, private industries, students, and the wider public in general on preventing, identifying, and dealing with modern slavery and wider human rights violations.

## Our Mission

To combat modern slavery and wider human rights violations by providing practitioners with the knowledge and skills to understand, identify, and respond to these human rights abuses. To actively work to reduce the factors that increase vulnerability to modern slavery and wider human rights abuses. We strive to achieve our mission objectives by adhering to our 5-pillars;



### Service

Deliver the best possible service by constantly updating our training packages to reflect current research and trends in a client-specific context based on needs and capacity.



### Expertise

Development and delivery of our courses by highly skilled and experienced trainers and consultants in their respective field.



### Awareness

Raise awareness of modern slavery and human rights violations within the wider context of social and corporate social responsibility.



### Equality

Promote equality by instilling respect and dignity through our work. We inspire clients to embrace inclusive, fair practices.



### Sustainability

Constantly review our own business and supply chain to ensure that the services we provide, and the way we provide them, adhere to human rights and wider ethical practices.

# Sustainability Plan 2020-2025

We aim to contribute positively to developing a more sustainable future. We measure our sustainability against the UN Sustainable Development Goals (SDGs).

We also understand how many SDGs cannot be achieved without eradicating modern slavery.

**Our particular areas of immediate focus are SDGs 8, 5, and 13.**

## 8 Decent work and economic growth



Sustainable economic growth will require societies to create the conditions that allow people to have quality job

- Take a responsible approach to procurement, taking into account the social impact from source to self, not source to shelf.
- Work with private companies and governments to provide sustainable working opportunities.
- Source our company-branded clothing from certified Fair Trade <sup>®</sup> suppliers.

## 5 Gender equality



Gender equality is not only a fundamental human right, but anecessary foundation for a peaceful, prosperous and sustainable world.

- Incorporate dedicated content that focuses on harmful practices such as child marriage and FGM (Female Genital Mutilation) [6] into our training curriculums.
- Incorporate dedicated content on investigating and supporting victims of domestic abuse [7], and gender- based discrimination into our training curriculums.
- Identify and partner with organisations that support victims of trafficking, including those that cater specifically for women and children.
- Encourage an equal gender-ratio of trainees.  
Recruit a balanced gender-ratio of trainers to deliver training, where possible.

## 13 Climate action



Climate change is a global challenge that affects everyone, everywhere

- Utilise public transport where possible.
- Track our corporate carbon footprint for all transportation through the Carbon Footprint Calculator <sup>™</sup> and aim to reduce and rebalance emissions through carbon offset projects.



Our full sustainability plan can be accessed via our website at [www.illustroconsultancy.co.uk](http://www.illustroconsultancy.co.uk)

# Modern Slavery In Supply Chains

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## Why should your business care about modern slavery and wider human rights violations?

### Legal compliance

Human rights due diligence in business continues to formalise into national and regional law. In 2015, the Modern Slavery Act came into effect in the UK. Section 54 of The Act requires every business which supplies goods or services and carries on a business or part of a business in the UK with a total annual turnover of £36m or more, to produce a statement of the steps a business has taken during the financial year to ensure that slavery and human trafficking is not occurring in their supply chains and in their own business.

The European Union have now introduced the EU Directive on Corporate Sustainability Due Diligence (CSDD). The CSDD introduces requirements for companies to identify and prevent, end, or mitigate the actual and potential impact of their activities on the environment and on human rights abuses. It obliges companies to conduct due diligence not just on their own operations, but also on the activities of their subsidiaries and other entities on their value chains with which they have direct and indirect established business relationships.

### Brand value

Ethical values directly relate to strength of brand value and reputation. Conversely, negative public image can lead to high revenue losses. Suppliers are an extension of your business and their negative publicity equals your negative publicity. Showing your company has ethical business practices can have a positive impact on purchase decision making.



# Risk of civil litigation

Forced labour and trafficking for forced labour are first and foremost morally unacceptable. Gaining profit from human rights abuses can lead to civil cases being brought against businesses.

## Consumer habits

As CSR continues to develop, consumers will evermore balance the cost and ease of purchase against ethical sourcing of products. Companies have historically, and contemporarily, focused on the sustainability of their supply chain in terms of the ongoing availability of the raw materials used to produce their product, as well as the environmental impacts in response to national and international laws and guidelines e.g. Climate Change Act 2008; Paris Climate Accord 2016. However, focusing purely on availability of the product has shown to overlook the adverse consequences to the people providing the labour used in the production process.

## Case Study

In 2016, Mohammed Rafiq, owner of the UK bed-making business Koze Sleep and supplier of major retailers in the UK, was convicted of conspiracy to traffic. Rafiq's conviction followed two Hungarian gangmasters who were found guilty of supplying slave labour to the UK factories run by Koze Sleep and its subsidiary Layzee Sleep. The two Hungarian gangmasters promised Hungarian workers good wages and accommodation if they travelled to the

UK. Instead, the workers were detained in overcrowded, squalid conditions, and forced to work up to 16 hours a day, often for up to seven days a week and for less than £2 a day. The court concluded that Rafiq had knowingly employed these trafficked men and "went along with their exploitation as a slave workforce."

**This marked the first conviction of a UK-based business owner under the Modern Slavery Act 2015.**

BBC, 20 January 2016





# Trade Risks

Fair trade regulations in some countries prohibit the import of goods that have been produced by forced or trafficked labour. Such allegations can result in confiscation of imported goods by public authorities, disruption to trade and production schedules, and even criminal investigations against importers.\*\*

## Negative investor relations

Allegations of forced labour and trafficking also have the potential to threaten investor relations. Socially responsible investors, as part of their Environmental, Social and Governance (ESG) assessments, will review the practical steps that companies have taken to eliminate forced labour.\*\*\*

## Case Study

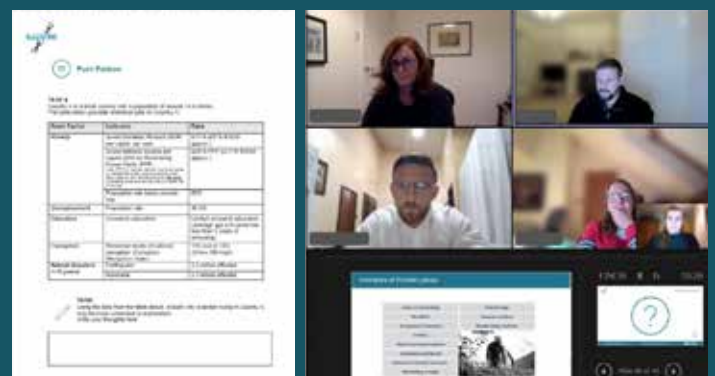
Galdikas & Ors v DJ Houghton Catching Services Ltd & Ors [2016] EWHC 1376 (QB) (10 June 2016)

The claimants were six individuals who alleged they were trafficked from Lithuania and subjected to severe labour exploitation on chicken farms in the UK. The Judge found in their favour on several claims including that they were not paid according to minimum wage requirements for agricultural workers. The defendants were also found to have made unlawful deductions or unlawfully withheld wages for an “employment fee” in relation to rent, and

failed to ensure the workers had adequate facilities to wash, rest, eat and drink. This marked the first High Court ruling in favour of victims of trafficking, in the first civil case against a British company.

This led to more than £1 million in compensation and legal costs.

The Guardian, 28 February 2020



\*\*The US Trade Facilitation and Trade Enforcement Act of 2015, signed by former President Obama on February 24, 2016, strengthened the capabilities of U.S. Customs and Border Protection (CBP) to enforce U.S. trade laws and regulations. More specifically, Section 307 of the Tariff Act of 1930 (19 U.S.C. § 1307), which prohibits the importation of merchandise that has been mined, produced, or manufactured, wholly or in part, in any foreign country by forced labour – including prison labour and forced or indentured child labour. Such merchandise is subject to exclusion and/or seizure, and may lead to criminal investigation of the importer(s).

\*\*\*Investors are now seeking guidance on this issue through the newly established Financial Sector Commission on Modern Slavery and Human Trafficking.

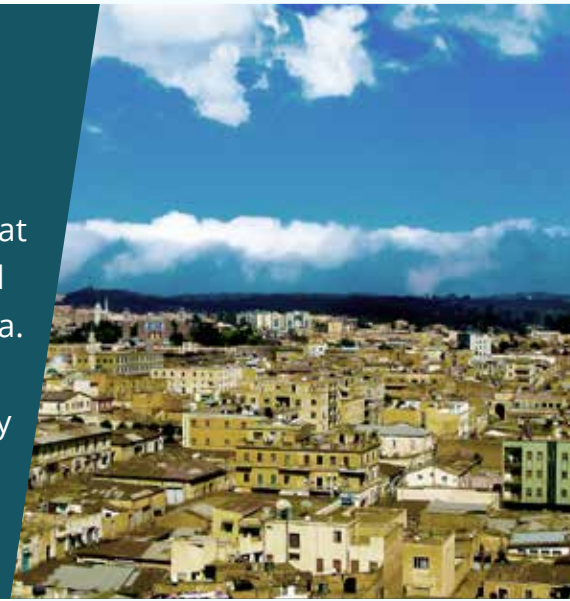
Forced labour and human trafficking for the purpose of forced labour are therefore important issues for employers. Governments around the world are starting to enact domestic legislation requiring businesses to eradicate modern day slavery in their supply chains. This can lead to a decrease in brand value, threaten investor relations, and ultimately lead to imposed injunctions to disrupt company operations.

The process therefore requires a top - down, bottom - up approach.

Understanding and commitment from senior board level, combined with trained staff and management will drive new practices within a business, as well as its supply chain by insisting on the same ethical standards for its suppliers.

## Case Study

On the 3rd January 2020, the Supreme Court of Canada ruled that a Vancouver based mining firm could be sued for slavery, forced labour and crimes against humanity over its operations in Eritrea. This marked a watershed moment where the Court recognised for the first time that a Canadian corporation may be held legally responsible for violations of international law that protect human rights.



Identifying and eliminating forced labour in supply chains requires gaining a clear understanding of how forced labour operates in different contexts, of who is affected and how. This process requires a holistic approach from the outset and will present challenges of time, resource, and expertise within companies.

At Illustro Consultancy Ltd, we understand that in order to find the problem you need to know what you're looking for in the first place. Our workshops are designed for business personnel to understand what modern slavery is, how to identify it, and how to practically reduce its presence within their own business, supply chains, and customer base.

There's also a few other things we understand:

### Training can be too generic and not cater to the role of key personnel.

Each of our workshops build knowledge step-by-step and are tailored to the roles and needs of the trainees. The content of our workshops are also regularly updated to reflect the most up-to-date and relevant information based on the latest experience and research from across the world.



## No one learns in the same way

Each workshop incorporates a range of learning methods that adhere to adult learning principles. Trainees will learn through visual aids, written exercises, case studies, reflection, live scenarios and directed, open source (internet-based) research on key reports and databases.

## People will naturally forget some things they have learned during their training

Each trainee receives a task booklet<sup>1</sup> or course manual<sup>2</sup> that compliments the delivery of the workshop and acts as a reference for the future.

## E-learning modules do not build sufficient knowledge for key personnel

We deliver dynamic, interactive learning environments during our face-to-face training, both in person or online remotely, to ignite the learner with the passion and expertise of our trainers. We engage our trainees with innovative activities and develop confidence in their knowledge and abilities to tackle the challenging issues of modern slavery and wider human rights violations.

# What makes our training different?

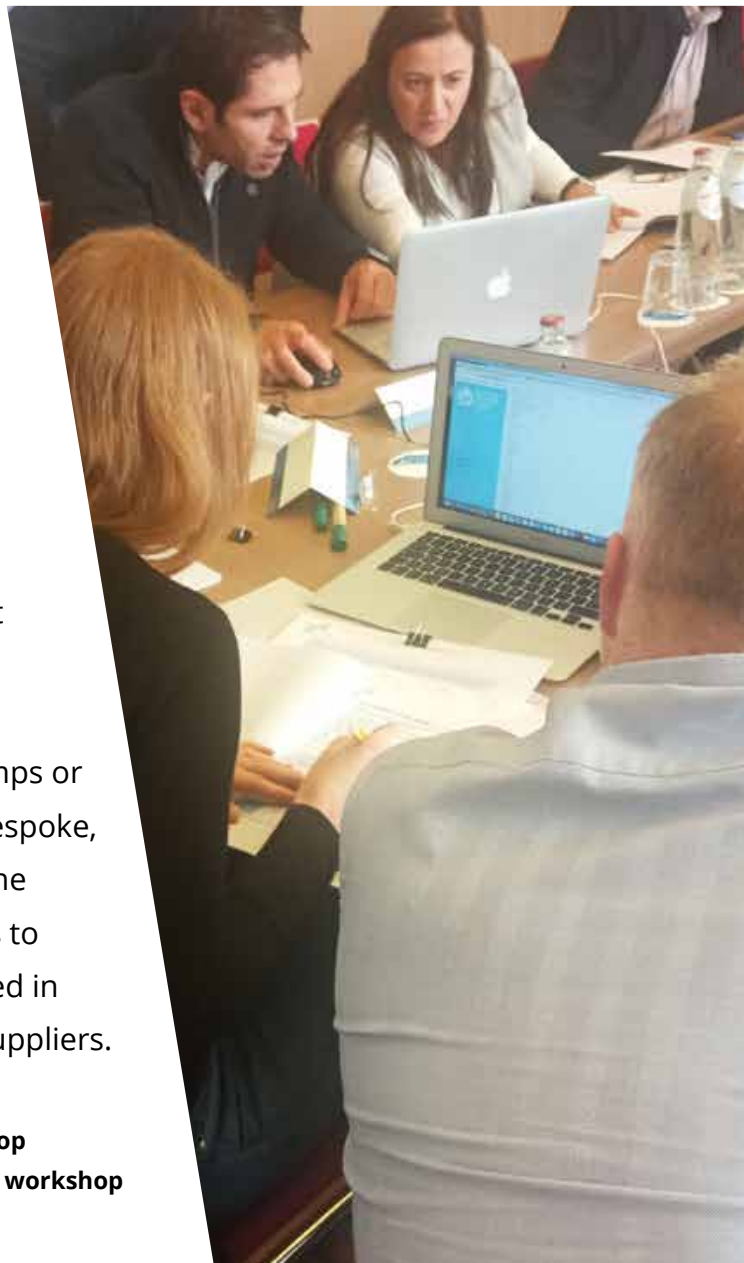
Our trainers have exceptional experience in dealing with modern slavery and wider human rights violations. We draw from a pool of international experts in law enforcement, human rights, national and international law, supply chain management, and academia. Combining our areas of expertise, together with the most up-to-date research, has allowed us to develop a unique approach to anti-slavery training.

We teach the theory behind modern slavery risks, allowing clients to predict future trends and align their supply chains to ensure limited disruption and prevent financial loss.

Our workshops are not just webinars, information dumps or standardised processes. All our training courses are bespoke, including interactive simulation exercises adapted to the company and sector, with tools that empower trainees to apply the techniques and information they have learned in relation to their own unique operations and existing suppliers.

**1For participants of our Modern Slavery in Supply Chains workshop**

**2For participants of our Conducting Human Rights Investigations workshop**





# Modern Slavery in Supply Chains

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Our Modern Slavery in Supply Chains workshop is designed for businesses to understand what modern slavery is, how to identify it, and how to practically reduce its presence within their own business and supply chains.

The workshop is bespoke in nature and tailored to our clients' needs, however our trainees have typically included Board Members, Global Supply Chain and Procurement Managers, Human Resources, Corporate Law, CSR Managers, and Sustainability Managers.

## Structure of the workshop

The workshop takes place over two full days and builds knowledge and practical skills step-by-step. Trainees learn through visual aids, written exercises, case studies, reflection, live scenarios and directed, open-source (internet-based) research on key reports and databases.



## Learning outcomes

Our workshop will ensure trainees:

- Understand what is meant by 'modern slavery' and its constituent offences
- Grasp national and global patterns of forced labour and modern slavery
- Identify the recruitment and control methods used by traffickers
- Pinpoint risks of modern slavery within your business and supply chains and anticipate future trends
- Develop and implement control measures to mitigate risks of modern slavery in the supply chain
- Identify and respond to forced labour
- Spot gaps in existing policies
- Develop a MSA Section 54 statement to promote company ethical values and increase brand strength



# Conducting Human Rights Investigations in Supply Chains

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Human rights violations in supply chains are a long-standing issue. Investigators of such violations face the challenging task of determining the cause, period, and material evidence of human rights violations, applying safeguarding principles to those harmed, and writing detailed reports based on objective facts.

Our Conducting Human Rights Investigations in Supply Chains workshop aims to enhance businesses' internal capacity to investigate potential incidences of human rights violations in their supply chains. The workshop is customised and tailored to our client's needs. Our typical trainees include Directors of Labour Relations, Heads of Global Subcontractors, Global ESH Risk and Compliance, Supply Chain and Procurement, Contract managers, and Human Resources.



## Learning outcomes

Our workshop will ensure trainees:

- Identify potential human rights violations and distinguish them from more commonly identified labour issues
- Understand the psychological impact of human rights violations on those affected and the unique effect this has on investigations
- Recognise who or what may be at risk and the types of risks in human rights investigations
- Develop safeguarding plans and ensure adherence to safeguarding principles
- Conduct interviews with potential survivors of human rights violations
- Apply the principles of effective reparations
- Develop correction and remediation plans
- Participate in debriefings of investigations
- Know the health and welfare support mechanisms available to investigators

The workshop takes place over three full days (in-person) or four half-days (online). It progressively builds knowledge and practical skills. Trainees learn through visual aids, written exercises, case studies, reflections, and simulation exercises.

# What is included in our trainings?



Email  
Support



Certificate



Task  
Booklet



Conducting Human Rights Investigations in  
Supply Chains Course Manual<sup>3</sup>



Modern Slavery Risk Assessment Key  
Datasets v.3<sup>4</sup>

<sup>3</sup> For participants of our Conducting Human Rights Investigations in Supply workshop

<sup>4</sup> For participants of our Modern Slavery in Supply Chains workshop

# Testimonials



We take great pride in knowing that 100% of trainees have rated 'excellent' for trainer knowledge, facilitation skills, business relevance of training, and overall value of the training. Here are some comments from our trainees...

” *“The training was one of the most interesting and impactful tasks I have undertaken.”*

Director of Global Ethics & Compliance  
Sims Limited

” *“Engaging, interactive and relevant. A much deeper subject than anticipated.”*

Group Procurement Manager  
Belron International Ltd

” *“The trainer’s knowledge, as well as the business relevance and overall enjoyment of the course was excellent. 10/10.”*

Site Manager  
Brymor Construction Ltd.



# FAQs

## ? Where will the workshop take place?

We operate globally and use training sites selected by our clients for their convenience, including online delivery.

- For face-to-face training, we have a few requirements to ensure that trainees get the most out of our training:
- The location provides access to WIFI/internet
- The location is sufficient in size for chairs, tables, break-away exercises, and wheelchair access, if required\* (minimum of 60 m2)
- A white screen and projector\*\* for visual/audio presentations

## ? Do trainees need to bring anything with them?

Yes. This is an interactive online workshop with tasks. All trainees will require the following:

- A WIFI-enabled portable personal computer (e.g. laptop, notebook or similar device) that can access WIFI networks, search the internet and download PDF files
- Device's charging cable

## ? What language will the workshop be delivered in?

The workshop is delivered in English. An English language proficiency level of level 3 (Professional Working Proficiency) or above is required to participate in the workshop.

## ? Will trainees have to do a little self-study before the workshop?

Yes. Prior to the workshop trainees will be required to review some common terms used throughout the training.

## ? How many people can be in the workshop?

The workshop is designed to cater for up to 10 persons.

\*Please inform us in advance if any trainees have any special requirements

\*\*A projector can be provided if not provided at the location





# Investigation services

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Our investigators have a wealth of experience in conducting complex investigations on serious and organised crime, both at national and international level.

Our investigation team comprises of former law enforcement, intelligence officers, and military specialists.

Together we conduct investigations on potential human rights violations in supply chains, as well as help support develop the supply chain investigation teams of our clients.

Contact us for more information



# Meet Our Trainers

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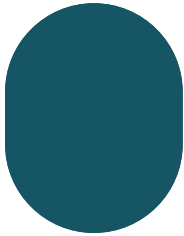


## Brigadier General (ret.) Pieter Cronje

Pieter is a former Human Rights lawyer and Brigadier General in the South African Police Service, where he established the first Human Rights Unit following the first democratic elections in 1994.

He is an expert trainer and educator on human rights and anti-human trafficking, operating in 69 countries with law enforcement on behalf of UNHCR, UNDP, UNODC, Commonwealth Secretariat, British Council, and the Raoul Wallenberg Institute in Sweden, to name a few.

Pieter's expertise also extends to the private sector, working in the extraction industry on pipeline security and human rights with BP and BHP Billiton.



## Jennifer Wascack, JD

Jennifer is an internationally-qualified attorney and MBA specialising in business and human rights. She is a former prosecutor and investigator with 20 years of experience in organisational leadership, policy, strategy, and advocacy on matters of global economic, social, and political inequality.

She works with companies across a variety of sectors to develop management systems that can identify and mitigate human rights risks within their organisation and supply chains.



## Mina Chiang

Mina has extensive research experience in modern slavery, forced labour, and human rights issues across a wide range of UN bodies, governments, and NGOs. Mina has now become a sought-after expert, especially for her experiences in countering forced labour in the scamming compounds in Southeast Asia and forced labour in the fishing industry.

With an interdisciplinary background in engineering, sociology, anthropology, and international development, Mina has consulted in some of the world's poorest and most conflict-affected countries in the world.



## Lieutenant Colonel (ret.) Dirk Burger

Dirk has 40 years of law enforcement experience with the Royal Netherlands Marechaussee. He is a former Head of Internal Investigations, Head of Criminal Investigation Department, and has managed multi-disciplinary teams across a wide range of law enforcement agencies.

As an experienced UN law enforcement advisor and trainer, Dirk is now widely recognised as an expert in combating organised crime, specifically in the areas of human trafficking, people smuggling, and intelligence development.

# Meet Our Trainers

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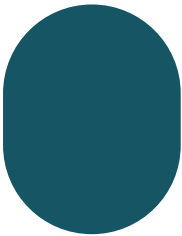


## Paul Smith

Paul is a qualified Forensic Accountant and a former UK police Detective Sergeant. His skill set is fairly unique, fusing his skills, experience, and training as a Detective with accountancy.

During the latter part of his police career, Paul was the coordinator for multi-agency investigations, those involving vulnerable adults as victims. Paul now also acts as an international Subject Matter Expert (SME) in all aspects of financial crime.

He has advised various Governments on the investigation of complex fraud, money laundering, corruption, and terrorist financing matters.

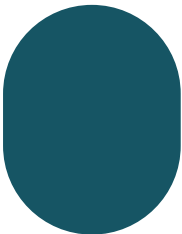


## Jackie Vallack

Jackie has 25 years' experience in UK law enforcement in investigation and intelligence roles.

Since leaving the police, Jackie has gone on to design, develop and deliver investigative training programmes on behalf of the UN and other international organisations across Africa and Asia.

In addition, Jackie has also performed the role of Senior Training Coordinator on police reform in support of the Ministry of Interior in Libya.



## Kevin Vallack

Kevin spent 25 years working in UK law enforcement and intelligence, with a focus on serious, organised crime, financial crime, and terrorism.

He was involved in the conduct and management of complex investigations, and covert operations both in the UK and internationally. This included several years running and managing Covert Human Intelligence Source led operations in sensitive Counter-Terrorism investigations.

In addition, Kevin also has extensive experience as a trainer for the UN and other organisations.



Want to find out more about Modern Slavery?

Check out our [#letstalkmodernslavery](#) campaign on social media platforms. Contact us to see how we can help your business combat modern slavery



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