

THE GOOD LIFE PROJECT:

AN INVESTIGATIVE REPORT TO EXAMINE THE ETHICAL CREDIBILITY OF
FOUR PROPOSED CLOTHING MANUFACTURERS AND IDENTIFY POTENTIAL
INDIRECT OR DIRECT LINKS TO MODERN SLAVERY IN THEIR SUPPLY
CHAINS

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ABSTRACT

Modern slavery is a global phenomenon, that is both inter and intra-national, it is an exploitative crime, and is an abhorrent abuse of human rights. Modern slavery encompasses a wide range of exploitation types, but is not limited to; sexual exploitation, domestic servitude, forced labour and criminal exploitationⁱ. Modern slavery is highly prevalent within production plantations overseas, often in the less economically developed world, where health and safety, standards of policing, and the upholding of human rights are nowhere near as scrutinous as it is in the Western World or absent completely. This research report will adopt a qualitative case study methodology to identify the potential and indirect links between clothing manufacturers and modern slavery. Due to the broad nature of modern slavery, this report will predominately focus on the exploitative nature of labour and assess the efforts which the listed manufacturers have undertaken to ensure that their garments are sourced ethically, thus complying with “the Transparency in Supply Chains provision in the Modern Slavery Act 2015 which seeks to address the role of businesses in preventing modern slavery from occurringⁱⁱ”.

SLAVERY IN SUPPLY CHAINS

Modern slavery is a global phenomenon, that surpasses age, gender and ethnicity, it is an international crime, with a harrowing 45.8 million people involved globally, of this approximately 25 million involved in forced labour. The complex and varied nature of this crime makes it increasingly difficult to identify and detect, and therefore the statistics may be under-recorded. ‘Poverty, limited opportunities at home, lack of education, unstable social and political conditions, economic imbalances are some of the key drivers that contribute to someone’s vulnerability in becoming a victim of modern slaveryⁱⁱⁱ. Products that we buy and use every day, are often a by-product of modern slavery which descends from a relentless drive for low-cost goods underpinned by globalisation and neo-liberal policies. Sourcing goods from countries with reduced labour rights track records and minimal law enforcement in exchange for profit, consequently, fosters an environment where human rights and labour rights are increasingly infringed upon. Due to the long and complex nature of supply chains, it may often be difficult to source a product throughout the whole life chain, from picking raw materials, product manufacturing to shipping and delivery.

HIDDEN SUBCONTRACTING

The global economy set to favour profits has resulted in the perpetuation of exploitative labour practices, as manufacturing low cost good overseas, helps countries in the less economically developed world, yield high levels of foreign direct investment. Producing goods at the lowest cost possible has resulted in lax working conditions and scarce wages. Competing pressures within overseas plantations to secure contracts is made worse by brands relentless demands for rapid production and a fight for low production costs. The high incidence of subcontracting can be attributed to buyers’ demands drive for; short lead times, last-minute design changes, lack of knowledge about the supplier’s productions schedule/capacity and inadequate monitoring. Furthermore, at the supplier level subcontracting can be accounted for; lack of capacity, poor production planning, late arrival of inputs, worker actions and political unrest.

Whilst international legislative frameworks have been adopted to help reduce the worst forms of labour, many manufacturers are outsourcing their manufacturing to other illicit factories to fulfil high demands from overseas brands. Outsourcing manufacturing to other firms not only conceals exploitative labour practices but prohibits the buyer from accurately sourcing the product and mapping the ethics at all stages of the global supply chain. Thus leading to transparency in global supply chains, and undermining legal and normative frameworks including ILO conventions, the 2011 United Nations Guiding Principles on Business and Human Rights and also more recently the 2015 UK Modern Slavery Act which calls for businesses to prevent modern slavery from occurring in their supply chains & organisations.

THE ILO

International labour standards are legal instruments drawn up by the ILO positioning basic principles and rights at work. 'They are either Conventions (or Protocols), which are legally binding international treaties that may be ratified by member states, or recommendations, which serve as non-binding guidelines.'^{iv} The fundamental ILO conventions address the following; non-discrimination, Freedom of association, recognition of the right to collective bargaining, prohibition of all forms of forced labour and Prohibition of child labour'. When overseas manufacturing firms continue to use illicit manufacturing partners, they are not upholding a commitment to following international labour standards, as many illicit manufacturing firms are exempt from audits, and taxes and not formally registered, thus concealing exploitation and not holding countries to account. Producing low-cost goods is synonymous with forced labour embodying modern slavery practices.

UN GUIDING PRINCIPLES ON BUSINESS AND HUMAN RIGHTS

When countries turn a blind eye to these exploitative practices, to secure FDI, countries are also undermining a commitment to upholding human rights within their labour practices. Within the broader legal framework, the notion of human rights is enshrined in guidelines and treaties, to help address 'the global governance gap'- which is the gap in regulation, evolving from companies increasingly outsourcing goods and operating globally. Within the legal framework and broader academic literature, the concept of due diligence has become embroiled in human right matters, with human right due diligence being understood as a 'business process through which businesses identify, prevent and mitigate and account for how they address and manage potential and actual adverse human rights' ^vTo create good due diligence, companies are encouraged to be transparent and accountable, and able to map entire supply chains. This due diligence is also referred to in the Organisation for Economic Co-operation and Development guidelines for Multi-national enterprises and applies to both supply chains and business partnerships.

UK MODERN SLAVERY ACT

More recent legislation such as 'The UK Modern Slavery Act 2015 aims to 'reduce and eradicate the various forms of exploitation, thus supporting Sustainable Development Goal 8.7, stipulating that organisations ought to "take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, and by 2025 end child labour in all its forms"^{vi}. The UK modern slavery acts call upon greater transparency within supply chains and calls for buying companies to help align purchasing practices with human rights standards. In order to achieve this, companies ought to ensure corporate accountability considerations are reflected within buying companies and purchasing departments, and relationships are collaborative. Pricing policies which embody both social and environmental quality, improved communication between suppliers and buyers, where suppliers can openly communicate about production scales and capacity and enhanced planning and supply lead times and an agreed equal and realistic contractual agreements, thus reducing, potential fines and penalties, should suppliers be unable to meet deadline thresholds. Businesses are also recommended to follow code of conduct, local and international laws and follow best practice industry codes, including but not limited to Worldwide Responsible Accredited Protection (WRAP) and the Fair Labour Association (FLA).

METHODOLOGY

Research objective:

The research objective is to investigate the potential indirect and direct links between listed clothing manufacturers and modern slavery overseas. This research will adopt a qualitative research methodology to analyse corporate social responsibility efforts of the following four clothing companies; Just Hoods AWD, Gildan Hammer, Russell's and Beechfield. Once these companies have been critically analysed; recommendations for the proposed clothing manufacturer will be proposed.

Research questions

1. Has the company produced a modern slavery statement?
2. What efforts have these clothing manufacturers undertaken to ensure modern slavery is not present in supply chains
3. Are the garments accredited by international laws, and best practice industry codes, if so, who?

Methodology

This research report has adopted a qualitative desk-based methodological framework to address the above research objective- sourcing ethically produced garments. This is the preferred methodological framework as using secondary data analysis, enables me to gain insight into already existing evidence about companies and their compliance with ethics and good practice concerning labour standards. Drawing upon this evidence is less time consuming than conducting primary research, and is readily available information. Researcher bias in regards to the data acquisition process is lessened, and analyses can be conducted easily and quickly. Whilst this data is more readily available, the reliability and validity of the data may still be undermined due to transparency in global supply chains-thus undermining the reliability and validity of data, as it may not be showing the true extent to what is being measured, due to potential exploitative labour standards being concealed.

For this research, I will be analysing primary documents and information cited on the websites for the above clothing manufacturers. I will be reviewing the modern slavery statements, CSR compliance, and which garments are accredited by international laws, and best practice of industry codes to ensure that modern slavery is not affiliated in any way or endorsed by the business. Alongside this secondary data analysis, I will also incorporate a case study methodological research approach into my work to help generate an in-depth, multi-faceted understanding of the different ways in which companies are adhering to CSR efforts. Where further information may be required, I may also conduct primary research and directly speak with representatives for these companies should I require further information.

CASE STUDY 1: JUST HOODS

In support of the first research question, Just Hoods by AWDIS has composed a modern slavery statement- where a discussion of ethics and sustainability is deliberated. Within the statement. It is cited that “products are delivered with integrity”. To ensure this, products are certified members of the Business Social Compliance Initiative (BSCI) which is an initiative of the Foreign Trade Association (FTA). The BSCI has worked in partnership with Social Accountability Accreditation Services (SAAS) to “conduct surveillance of BSCI audits and auditing companies to verify that BSCI auditing protocols are being followed. The auditing measures provide better insight into the audit quality and, at minimum, include a regular schedule of SAAS office audits and shadow audits of BSCI auditing companies and auditors”.^{vii} Moreover, “the BSCI program is not a program for certification - a supplier may not receive a formal certificate upon conclusion of the BSCI audit. The BSCI program is a voluntary system by which BSCI members (retailers and brands) work with their suppliers to comply with the BSCI code of conduct”.^{viii}

JustHoods is also endorsed by Worldwide Responsible Accredited Production (WRAP) which is the world’s most accepted independent certification for the apparel/textile, footwear, and sewn products industry. The program monitors and certifies lawful, humane and ethical production.

WRAP principles include

- ‘Compliance with laws and workplace regulations
- Prohibition of forced labour
- Prohibition of child labour
- Prohibition of harassment or abuse
- Compensation and benefits as required by law
- Hours of work as limited by law
- Prohibition of discrimination
- Health and safety
- Freedom of association and collective bargaining
- Environment
- Customs compliance
- Security’^{ix}

According to WRAP’s website, these principles “are based on generally accepted international workplace standards, local laws and workplace regulations which encompass human resources management, health and safety, environmental practices, and legal compliance including import/export and customs compliance and security standards.”^x Wrap operates a tiered certification program that needs to be renewed yearly, and it follows a code of twelve principles that cover and expand upon basic labour rights. To get certified, a company has to pay a registration fee, conduct a self-assessment in which the company is required to reflect on how it can improve its standards while showing that it has been “utilizing socially-compliant practices,” agree to be monitored by a WRAP-accredited organization, and then it must agree to receive random post-certification audits throughout the company’s certification period”^{xi}

JustHoods has also become PETA-approved to sustain its reputation as environmentally conscious. JustHoods cited the following, “The PETA-Approved Vegan logo was established to label products that no animal had to suffer for, and highlight vegan fashion items commitment to animals”.^{xii}

Within its modern slavery statement, the company has cited its efforts to ensure exploitative practices do not occur within the production chain by enabling consistent monitoring of mapping all stages of the entire manufacturing process, following the code of conducts produced by the above accreditations by sharing a commitment to fair and safe working practices, where stringent monitoring of all suppliers is conducted and in country-teams frequently visit and inspect factories. The brand has also recently come out with a new range called the 'organic and recycled edit' which JustHoods has described as being environmentally conscious, and making a "big difference to do better, to be better and inspire change, to match the ideals of consumers who love and want to wear products".^{xiii}

A telephone enquiry was also recently made by the CEO of the 'good life project' to Just Hoods, to obtain further information about the company and its product. When speaking with a business executive, it was reported that the garments are accredited by WRAP and Amfori BSCI which supports the information presented in its modern slavery statement. This line of enquiry also found that the garments are produced in Pakistan. From a preliminary google search of Pakistan's track record of modern slavery within the textile, The ILO identifies that 58 per cent of people in slave labour are in the major cotton- or garment-producing countries of the world: China, India, Pakistan, Bangladesh and Uzbekistan. This is attributed to such countries having a high vulnerability to the conditions that lead to slavery. Within Pakistan, the ILO has recently pledged funding to help minimize forced labour in such industries.

By the following WRAP, and BSCI, JustHoods is minimizing the risks of exploitative labour practices and lax working conditions in its factories overseas. JustHoods has also become PETA approved, thus signifying a positive stride towards cruelty-free clothing applicable to both animals and humans. Whilst it is encouraging that JustHoods is partnering with accreditors whose principles support minimizing labour exploitation, the success of WRAP which is a leading accreditor has been somewhat scrutinized for its involvement in a plethora of public scandals with WRAP certified companies being complicit in offences spanning from harassment cases and illegal firings to occurrences of more than 100 child labourers and unpaid wages. It is also an apolitical organisation and therefore focuses on compliance with local law, and does not lobby or advocate for issues such as freedom of association outside of local law, nor the concept of a living wage, which has not been defined.

Furthermore, auditing results are entirely confidential, do not necessarily involve local workers' organizations where facilities are located and do not include a complaint procedure. Whilst WRAP does develop plans for facilities to correct violations, workers and unions are not included in such an effort as a matter of practice. This is somewhat contradictory to its principle of freedom of association and collective bargaining. The ILO has described freedom of association and collective bargaining as being "fundamental rights, which make it possible to promote and realize decent conditions at work."^{xiv} The absence of this right enables modern slavery to thrive, as it will continue to thrive unless workers can self-organise and collectively negotiate with their employers.

Amfori BSCI is another accreditor with which JustHoods is associated too. The benefits of this membership include; "improving the social performance of companies supply chain, reduced cost and increased efficiency. A clear and consistent approach that highlights best practices. Improved resilience of business to industry and market changes and enhanced businesses' reputation by meeting the expectations of customers and stakeholders".^{xv} Unlike WRAP, Amfori BSCI has created a public report titled 'Amfori's response to recommendations for improvement- an approach to human rights due diligence within this report Amfori BSCI has responded to recommendations and implemented triangulation methods to cross-verify multiple sources (e.g. worker interviews, documents and site observations). All of these processes help mitigate the potential direct and indirect links of modern slavery.

In conclusion, JustHoods has complied with the UK modern slavery act (2015) by completing a modern slavery statement. Within the modern slavery statement, the company put forward their views on sustainability and ethics and the initiatives which are followed to fulfil this, including BSCI, WRAP, SASS and PETA. Further research from JustHoods also found that they have come out with a new range which is called the organic and recycled edit. This new range goes a step beyond ensuring modern slavery is not complicit within the production chain but also ensures that quality is enhanced. This new range may be an appropriate manufacturer for 'the good life project' merchandise range. Within this chapter, a brief discussion of WRAP and Amfori BSCI has been conferred, as these are the accreditors with which the company has partnered and the minimum standards which they are to uphold. Overall the company does seem to be very good and has aimed to go above and beyond, by furthering their ethics' in regards to the environment and animal welfare too.

CASE STUDY: RUSSELLS- EUROPE

In support of the first research question, Russell's has published a human trafficking and modern slavery disclosure statement, thus complying with the UK Modern Slavery Act (2015) and also the regulations cited under the California Transparency in Supply Chains Act (SB 657). Russells is a brand of 'Fruit of the Loom' and therefore the policies and procedures are affiliated with this leading brand. Within this statement, the company puts forward their definition of human trafficking and defines modern slavery broadly to include any form of servitude, forced or compulsory labour and human trafficking. Russell's has pledged a commitment to "continuously monitor and improve the effectiveness of prevention efforts, incorporating key learning into the enhancement of policies and practices, to eliminate any form of human trafficking or modern slavery in the factories producing a family of brands ""^{xvi} Russells Europe is also accredited by WRAP and Amfori BSCI.

A further report by Russells, presented the actions they had taken in 2019, to minimize modern slavery & human trafficking within its operations. These accomplishments include; enhanced code of conduct benchmarks- with migrants being informed of basic terms of employment, which was also incorporated into the brands' implementation of the commitment to responsible recruitment. This is an encouraging step made by the buyer to ensure that staff within the factories are aware of their terms of employment, and their rights. There is more protection. Furthermore, responsible recruiting and employees having a contract stipulating their rights and duties provides them with an understanding of their rights, with this information forced labour may be decreased.

Another improvement by the brand has included updated and modified posting requirements for its code of conduct, factory safety policy and human trafficking posters and mandate that these are to be provided in the languages spoken by every employee in the factory.

Before this, Russell's reported that the previous requirement was for languages spoken by 10% of the workers in the factory. This is highly concerning to know that 90% of employees were potentially denied vital information about the code of conduct, and factory safety. This not only undermines principles of equality- the state of being equal, especially in status, rights, or opportunities. But given recent disasters, in factories overseas in LEDCs, including; The 2012 Dhaka garment *factory fire killing more than 100 people*, and in April of 2013, the Rana Plaza building collapse, killing 1,132 people and injuring more than 2,500 others, **it's concerning that staff were potentially denied vital information about policies and procedures** in their languages including; code of conduct, factory safety and fire evacuation procedures. Policies and procedures are laid out to protect workers and minimize harm from occurring.

A further action carried out by the Brand in 2019 was the conduction of a gap analysis between the results of assessments conducted by industry recognised auditors and its code of conduct benchmarks. The brand identified that there were gaps in forced labour standards, and to mitigate this, additional compliance will be verified with on-site factory visits. This, therefore, shows that within this brand, they did find indicators of forced labour with individuals being 'compelled to provide work or service through the use of force, fraud, or coercion. Once the person is working, an employer may force, defraud, or coerce the victim to do work not agreed to at the time of recruitment'.^{xvii} This further indicates the importance of workers being informed of their basic terms of employment so that they can differentiate between expectations and exploitation which the brand have recently actioned.

Fruit of the loom has also issued a 'position statement on the allegations of forced labour of Muslim Uighurs and other ethnic minority groups in the Xinjiang Province of China, requiring suppliers to confirm and acknowledge the absence of forced labour in supply chains. Employees and suppliers who do not adhere to the zero-tolerance policy, and evidence of trafficking and modern slavery is found within the supply chain, and not remedied or appropriately addressed in a satisfactory manner, will result in the termination of business relationships. This signifies the brands' commitment to its zero-tolerance policy, however strict and ongoing measures ought to be regularly implemented.

Over 400+ factory assessments were conducted in 2019 and unfortunately, 27 findings associated with forced labour were identified including;

- 'lack of insufficient written policy on forced labour or procedure to ensure forced labour is not utilized in the supply chain'
- 'forced labour policy and procedure not reviewed annually'
- 'lack of training for workers on forced labour policy and procedure'
- 'payment of fees by foreign migrant workers for recruitment or employment'
- 'holding of foreign migrant workers' identification document factory'^{xviii}

Having acknowledged this, the brand has addressed the above with factories and provided them with corrective action plans or on-site visits, and have said that they will continue to monitor the corrective action plans for compliance.

The company produced the results from an outside consultant of the remediation program at one of its factories in Malaysia where the following was completed;

- 'completed reimbursement of recruitment fees to 99% of workers in scope, including those overseas'
- 'committed to zero-fee recruitment'
- 'strengthened recruitment practices'
- 'improved its overall working environment as confirmed by all workers'^{xix}

Further actions taken by Fruit of the Loom has included enhanced internal training on its code of conduct. With the brand, advising that all participants in supply chain management understand commitments and requirements. Paying close attention to matters such as trafficking and slavery and lessening risks. The brand has since, ensured all suppliers are given copies of the code of conduct in languages understood by the workforce. "In 2019, 499 hours of in-person and 12 hours of webinar training to employees and key partners covering human trafficking and modern slavery".^{xx}

Fruit of the loom also has a Social Compliance Assessment Program that is "designed to evaluate factories compliance with its code of conduct. Factories owned and operated by Fruit of the Loom, and finished goods contractors including subcontractors directly sourced by their company or a licensee and are accredited by third party or Fruit of Loom staff on an annual basis, these assessments are typically scheduled with factories, however, Fruit of the Loom has said that they

reserve the right to perform unannounced assessments at their discretion.^{xxi} They do not, however, mention the frequency of these unannounced assessments. The brand has also implemented mechanisms for workers to report suspected violations of the code of conduct by phone or email and has stated that they strictly prohibit any retaliation against persons who report violations.

Having assessed the above evidence, regrettably, the presence of modern slavery and trafficking has been identified in the supply chain of this chosen manufacturer despite being accredited by leading regulatory bodies. The brand has published findings from audits and put forward its' recommendations to do better. The report was published in 2019, which is considerably recent, in light of calls for enhanced protection of worker rights in southern Asian states following disasters such as, the 2012 Dhaka factory fire, the 2013 Rana Plaza factory collapse and Uyghur forced labour in China. Having identified multiple cases of modern slavery and human trafficking in factories overseas, I would not endorse this brand.

CASE STUDY: BEECHFIELD

Beechfield is a UK based company that produce high-quality headwear items. As a UK company, they have produced a modern slavery statement to support the 2015 UK modern slavery act. Within its' modern slavery statement, it communicates, it's a brand committed to offering good value products with industry-leading quality standards, not at the expense of any individual in the supply chain, nor with unacceptable environmental impact.^{xxii} Information about this brands' ethical policy is very scarce compared to the other brands researched. Attempts to make contact with the brand were unsuccessful, so further information about audit findings, CSR efforts and production countries has been limited.

The modern slavery statement has reflected its' core ethical principles, including the prohibition of forced or coerced labour. To mitigate the risk of forced labour occurring within the supply chain, the brand has implemented a stringent assessment program with all suppliers to ensure that factories adhere or surpass applicable local standards. These standards include but are not limited too; wages, health and safety, workers' welfare and human rights. All of these standards as synonymous with mitigating slavery and ensuring workers are well protected.

The brand carries out biennial CSR audits. Unlike the other brands researched in this report, Beechfield has not published the findings of these audits and has not put forward recommendations. It is therefore difficult to comprehensively identify whether there any direct or indirect links to slavery. Further research led me to an interview with Roger McHugh (managing director of Beechfield) it was only through this that I was able to find where products were sourced. "Products are made in partner factories in the Far East, predominately China. Field-based staff carry out audits for all manufacturing partners".^{xxiii} From this we know that the products are sourced in countries with lax labour track records, but the extent to which that brand can adequately minimize this has been challenging to identify because of minimal published data.

Beechfield is however accredited by fair trade, this enables cotton producers in developing countries to sustainably invest in their businesses and communities, and also examples Beechfields' commitment to giving back to local communities and also helps map slavery in supply chains, by ensuring cotton producers receive a fair payment for their produce, which is then introduced into the supply chain. Beechfield is also accredited by The Global Organic Textile Standard (GOTS) which is the worldwide leading textile processing standard for organic fibers. Other accreditations also include; OKEO-TEX- Organic content standards and REPREEVE which are all associated with fibers, cotton and materials. None of the accreditations, however, are specifically related to labour conditions and slavery such as WRAP or Amfori BSCI, which is concerning. With the minimal published data, I can see no severe risks to suggest that modern slavery and forced labour has

entered the supply chain. Further information may be required to reach a conclusive decision about this brand. As of now, I have still not received a response from the brand, about all of the countries it operates in, the nature of audits, and what recommendations they put forward.

CASE STUDY: GILDAN

From a preliminary google search, there seem to be no immediate concerns about the brand and its ethics. Gildan have said “the vast majority of our products are manufactured in facilities that we own and operate. Moreover, the textiles and yarn required throughout our manufacturing operations are also predominantly produced by us. This gives us significant control over our supply chain and the process through which we acquire materials, meaning that for the majority of our operations, we directly represent and manage our own supply chain. Outsourced products represent less than 10% of our total revenues”^{xxiv}

Their CSR page begins with a discussion of its ‘Genuine Responsibility social, environmental and governance (ESG) program. Gildan has 3 guiding pillars which include the following; caring for our people, conserving the environment, and creating stronger communities. Gildan has cited the following; “we have always maintained a focus on areas most material to our stakeholders, this includes human & labour rights, health & safety, traceability, and reducing our environmental impact”.^{xxv}The three pillars underpin the above ESG.

The first pillar- caring for people, highlights Gildans’ commitment to “embracing the responsibility to treat its’ 44,000 employees with respect, and providing them with rewarding, safe and healthy work environments, striving to foster a company culture where employees are valued and empowered to share in the success”.^{xxvi}To support this ethos, 96% of employees are represented by formal health and safety committees, 23 facilities with a health clinic on-site, and 180,670 hours of training conducted on its environmental health and safety policies and procedures. Furthermore, to ensure compliance with H&S standards, company-owned facilities are subject to monthly audits conducted by in-house safety coordinators and internal corporate social responsibility auditors, in addition to third-party auditors mandated by various external stakeholders.

Gildan operates a “vertically-integrated supply chain that allows us to have direct oversight of our operations, enabling us to have enhanced operational control over our health and safety practices. All of our owned facilities have built-in fire safety systems, such as fire control infrastructure, sprinkler systems, emergency exits and fire alarms, among other safety mechanisms like our Fire and Safety committees. In Bangladesh for example, we significantly upgraded our facility following its acquisition in 2010 to ensure we could provide our employees with a safe and healthy workplace. In 2014, this facility underwent a rigorous third-party audit by the Bangladesh Fire and Safety Accord to ensure the facility had a proper building and electrical structure. Since then, members of the Accord have continued to visit the facility on a regular basis to ensure the proper completion of the remediation plans”.^{xxvii}

Gildan has further committed ‘2.5 million hours of training to its’ employees, 52% of its’ workforce covered by a collective bargaining agreement’ and a strong focus on diversity, equity and inclusion with an inclusion strategy encompassing three key areas; talent acquisition, employee development and strategic partnerships. Gildan has committed to improving a higher standard of living for its employees, by offering benefits to meet their needs including ‘onsite medical clinics, vaccination and medicine programs, parental leave, financial assistance, subsidized meals, and free transportation.’^{xxviii} All ‘Employees need to be aware of the means available to them to report any issues that are in conflict with our Code of Conduct or Code of Ethics. Grievance mechanism training is provided to all employees to inform them of the resources available to them and equip them with the skills to use them effectively.

'Where Company's manufacturing facilities are located, employees earn more than the legally-mandated minimum industry wages. We believe in the idea that employees have the right to compensation for a regular workweek that is sufficient to cover basic needs and provide some level of discretionary income. In order to ensure that the salaries and total benefits offered to employees are sufficient to meet their basic needs, the Fair Labor Association (FLA) has developed a tool that will help to standardize the measurement of living wages at factories and comparable benchmarks.^{xxix}'

Gildan has also strongly reiterated the importance of fostering strong employee engagement and that within factories they operate round tables, where employees are given the opportunity to share their opinions and contribute to the management of various workplace issues including health and wellness, workplace safety, environmental stewardship and more. Employee rights are also conferred on with strictly applied codes and policies designed to protect the rights of employees in operations and supply chains including; Code of Ethics, Code of Conduct and Human Rights Policy. To mitigate modern slavery in its supply chains, Gildan has ensured that before taking on new contractors, they fully evaluate their ability to comply with the principles of its Code of Conduct, quality standards, and cost expectations. By conducting mandatory audits either by their experienced internal auditors or, in some instances, by a third-party auditing services. To evidence this, in 2019, Gildan completed 151 social compliance audits at company-owned and contractor facilities. Furthermore, 100% of scheduled internal social compliance audits were completed.

Conclusion

Gildan appears to be a well-accredited manufacturer, who really do seem to put its employees at the heart of its business. Out of all of the above companies, it has published the most data and has created detailed reports accessible to the public. Because it operates many of its' own factories, chances of modern slavery and exploitation occurring are minimized because they possess significant control over manufacturing and are able to adequately map products throughout all stages of the supply chain. Gildan have produced a very comprehensive and detailed report about its principles including; the work force, work place, and the environment. It has made reference to fair wages, and wages being aligned to salaries in the countries it operates in. The employee benefits seem to be creditable, and the commitment to ensuring ongoing audits take place also seem encouraging. Following this, I would recommend Gildan as an appropriate manufacturer of 'The Good Life project' merchandise.

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- XXV. <https://gildancorp.com/en/responsibility/pillars/>
- XXVI. <https://gildancorp.com/en/responsibility/pillars/caring-for-people/>
- XXVII. <https://www.genuineresponsibility.com/en/priorities/caring-for-our-people/workplace/>
- XXVIII. <https://www.genuineresponsibility.com/en/priorities/caring-for-our-people/workforce/>
- XXIX. <https://www.ethicaltrade.org/issues/living-wage-workers> and <https://www.genuineresponsibility.com/en/priorities/caring-for-our-people/workforce/>

DIRECTOR'S REVIEW – SAM BROOKS

I requested an investigator to identify any direct, or indirect links between the listed clothing manufacturers used by The Good Life Project, to establish where, if at all they exist. This investigation was launched in response to increased media coverage on modern slavery and poor worker conditions around the world, most recently observed in the Xinjiang province of China.

Modern Slavery, is a global pandemic which effects millions of people worldwide. Modern Slavery is illegal, and whilst it varies in severity, (from cases of physical abuse and deprivation of human rights to lack of health and safety in the workplace), in this modern age, it is widely accepted that poor working conditions and mistreatment of workers is completely unacceptable. Not only is this against international law, but the causal sequence of pain and suffering associated with it, is not consistent with the project's objective in making the world a better place.

In my view, conducting this investigation was nothing more than a basic moral obligation, to ensure we are doing our part, to tackling this global issue. It is every company's responsibility to ensure that the execution of their trading does not negatively impact the world around them, or at least, it is their responsibility to mitigate such impacts.

My role is to review the evidence presented to me by Aston, and to come to a reasonable conclusion as to whether or not we, The Good Life Project will associate with these manufacturers.

I have carefully reviewed the research outlined by Aston Atkinson in relation to this matter, and have made conclusions. The two clothing manufacturers which presented concerns to me, were 'Russells' and 'Beechfield'.

In the case of Russells, there were historic cases of potential links to Modern Slavery. These findings included various gaps in learning and development. However, the issues which I considered 'significant' outlined by Aston related to the holding of personal documentation, and the payment of fees in exchange for labour. These two practices in of themselves, do not constitute in my view, direct abuse, and enslavement. However, such practice creates an inhabitable environment for modern slavery, and this is of course unacceptable.

However, as outlined by Aston, it is clear that the company have publicly acknowledged these issues, and have made direct steps to tackle them at the source, and prevent them from happening again. This, in my view is demonstrated in the increase in training workers now receive, and the zero tolerance approach to worker abuse, accompanied by site visits.

As mentioned before, whilst it is my intention to respond to the potential direct, and indirect links between associates and modern slavery robustly, it is appropriate, to take a reasonable approach when considering historical incidents. In this case, I must consider the cultural differences between Britain and Asian countries, and I do recognise that certain practices, despite being unacceptable to me, are not considered pathological in other societies. In addition to this, it is clear to me that the company have positively responded to the issues identified in their review, and are making efforts to tackle modern slavery.

Therefore, I am satisfied to continue working with this manufacturer, and will re-assess the situation in July, 2022.

Upon reviewing the evidence on Beechfield, I felt very concerned. Whilst there was no specific evidence proving any connection between this manufacturer and unlawful practice, the findings of various reviews in their factories had not been published. In addition to this, Aston reported that attempts to contact the company had failed, and they were not engaging with the investigation at all.

In this modern age, when modern slavery is under the spotlight, it would surely be the case, in my view, that a company would exploit the positive results of their internal reviews into worker rights and welfare, in order to fulfil Corporate Social Responsibility, and thus enhance their brand firmness in the marketplace. That is unless of course, the result of these reviews would put the company into disrepute.

The only way to tackle issues on the same, or similar scale to modern slavery, is by being completely open and transparent. Review findings should be published, and it is in my view, that when you have something to say, silence is as good as a lie. Lines of enquiry in this investigation indicated that there was a high possibility that a large amount of their labour is done in Far East China, a high risk area for modern slavery.

This company has shown a lack of transparency, and did not engage with this investigation. I do not know if there is slavery going on within their factories, but I am not willing to risk funding it.

I have concluded that The Good Life Project will not, under any circumstance trade with this manufacturer until a time of which they release their findings, and those findings are considered acceptable by the project, and in line with our global objective.

Sam Brooks. Project Lead – The Good Life Project & CEO of Aspire Life Coaching Ltd.