

## **UNISON Slavery and Human Trafficking Statement 2025**

### **Introduction**

This statement is made under section 54 of the Modern Slavery Act 2015 and constitutes UNISON's slavery and human trafficking statement for the calendar year starting 1st January 2025 and ending on 31st December 2025.

This statement provides an update on progress made since our last statement and sets out our planned actions to prevent slavery and human trafficking, hereafter referred to as modern slavery, from taking place in our core operations or our supply chains.

The format of this statement is aligned to the new [Transparency in Supply Chain \(TISC\): Statutory Guidance \(2025\)](#) with frequent level 2 disclosures included without explicitly labelling it as such.

### **1. UNISON's core business, structure and supply chains**

1.1 [UNISON](#) is the UK's largest trade union. It acts for 1.3 million members who work to provide a wide range of public services and utilities, whether they're employed by private companies, public authorities or in the community and voluntary sector. UNISON has approximately 1,200 employees and an annual turnover of more than £205 million.

We represent members, negotiate and bargain on their behalf, campaign for better working conditions and pay, for public services and advocate for responsible business conduct in law and practice at home and abroad.

1.2 The union is structured nationally, regionally and at branch level. Policy may be developed at any of these levels – by service groups or self-organised groups – provided it falls within their defined remit and complies with UNISON's rules. The national head office is in London, supported by many regional offices and nearly 800 branches. Branches are run by elected volunteer officers, stewards and, in some cases, employed staff who deliver administrative support or casework.

We also operate a revenue generating holiday resort in Croyde Bay, Devon, and our call centre UNISON Direct, two wholly owned subsidiaries of UNISON.

UNISON is governed by lay members elected every two years to the National Executive Council (NEC). The NEC and its sub-committees set strategic direction and approve annual work plans and major projects, based on policy motions agreed by representative members at the National Delegate Conference.

UNISON has seven service groups. Each service group (Local Government; Health; Higher Education; Police, Probation & CAFCASS; Energy; Water, Environment & Transport; Community) elects its own lay leadership. These members oversee their service group's work plan, shaped by motions passed at their annual conferences.

1.3 We procure, amongst other things, legal services, IT hardware and software, furniture, stationery, electronics, white goods, travel services, vehicles, printing, mailing, conference facilities, promotional items, property and facilities management, and catering. Procurement is partly centralised, with some budgets and contracts managed by regional offices and others by national departments.

Most of our goods are purchased from UK-based resellers. These resellers usually source goods from UK-based distributors, while the brands and manufacturers are predominantly located outside the UK and Europe. UNISON has not been able to map our supply chain beyond Tier 1 but is committed to doing so for most ICT products in 2026. We will map these together with our monitoring partner Electronics Watch and subsequently continue with high-risk items.

We have long-term partnerships with many suppliers such as our promotional items' supplier, stationery, travel and our 'UNISON Living' member service providers. 'UNISON Living' is UNISON's brand name and logo to identify our endorsed affinity partners, selected through UNISON's procurement and due diligence processes. Some partnership IRA revenue contributes towards the UNISON International Development Fund which enables us to collaborate with trade unions in the Global South, including building capacity for trade unions to make use of human rights and environmental due diligence regulations.

Ninety-two percent of UNISON staff are directly employed on permanent contracts, and we are reducing reliance on agency workers by directly appointing fixed-term staff where practicable.

1.4 UNISON has an internal modern slavery advisory group comprising representatives from procurement, international unit, human resources, and a staff trade union representative (agreed by joint national trade union body). The key

purpose of this working group is to set key performance indicators and assess progress made against these, to drive and monitor continuous improvement in the union's practices in this area. This statement, the underlying risk assessment, and the information gathering process have been developed in consultation with this group.

UNISON's Finance and Resource Management Committee (FRMC) is tasked with reviewing annual progress and agreeing new KPIs and the Chair of the FRMC signs UNISON's Modern Slavery Statement. The International Committee is also informally consulted on progress.

## **2. Organisational policies**

2.1 UNISON has a [Supplier Code of Conduct](#) which sets out the [Ethical Trade Initiative \(ETI\) Base Code](#) as the minimum labour standards suppliers must meet or actively work towards, as well as requiring compliance with the Modern Slavery Act. As a default suppliers sign up to UNISON's Supplier Code of Conduct via an explicit declaration. In exceptions, suppliers may provide an equivalent Code of Conduct to us.

UNISON's [Responsible Procurement Policy](#) aims to actively drive best practice across the union to ensure the goods and services purchased are produced and delivered under conditions that have the least harmful effect on the environment, communities and workers, whilst obtaining value for money from UNISON's expenditure. The policy contains commitments to meet the requirements of the Modern Slavery Act. UNISON will not work with suppliers (or their sub-contractors) that unlawfully discriminate against employees, or suppliers that prevent or discourage employees from joining trade unions.

While our Responsible Procurement Policy and Supplier Code of Conduct are reviewed regularly, a more comprehensive review is planned for 2026. This is to factor in internal restructuring, a revised procurement risk matrix (Figure 3.2) and stakeholder feedback.

2.2 Policies applying to UNISON recruitment:

UNISON employs solely within the UK. Our recruitment procedures ensure prospective employees are legally entitled to work in the UK. All successful

applicants must produce their right to work documentation in line with the Right to Work Checklist published by the Home Office.

An elected Staff Negotiations Committee is in place for UNISON's own operations, which follows the Terms of Reference and Constitution for negotiation, consultation and information purposes around pay, terms and conditions, and health and safety. UNISON recognises and collectively bargains its staff wages and terms and conditions, including most policies, with three unions - UNITE, NUJ and its independent staff union, the Society of Union Employees (SUE).

UNISON is an accredited Real Living Wage Employer, and we ensure that indirect employees and all contractors on our premises are paid at least the Real Living Wage. All staff employed by UNISON are paid at least £15 per hour.

2.3 UNISON's international policy is determined by motions to our annual National Delegate Conference (NDC) and supports workers in the global south to access their rights and campaign in support of public services and corporate accountability among other things. This enables UNISON to work with international human rights and labour rights groups and offers support to international partners to challenge labour and human rights violations in countries identified as priority countries, or countries strategic to our international business and human rights strategy.

We are affiliated to several relevant organisations including Electronics Watch, Banana Link, War on Want and Labour Behind the Label (part of the Clean Clothes Campaign). We also closely collaborate with the Corporate Justice Coalition and Anti-Slavery International.

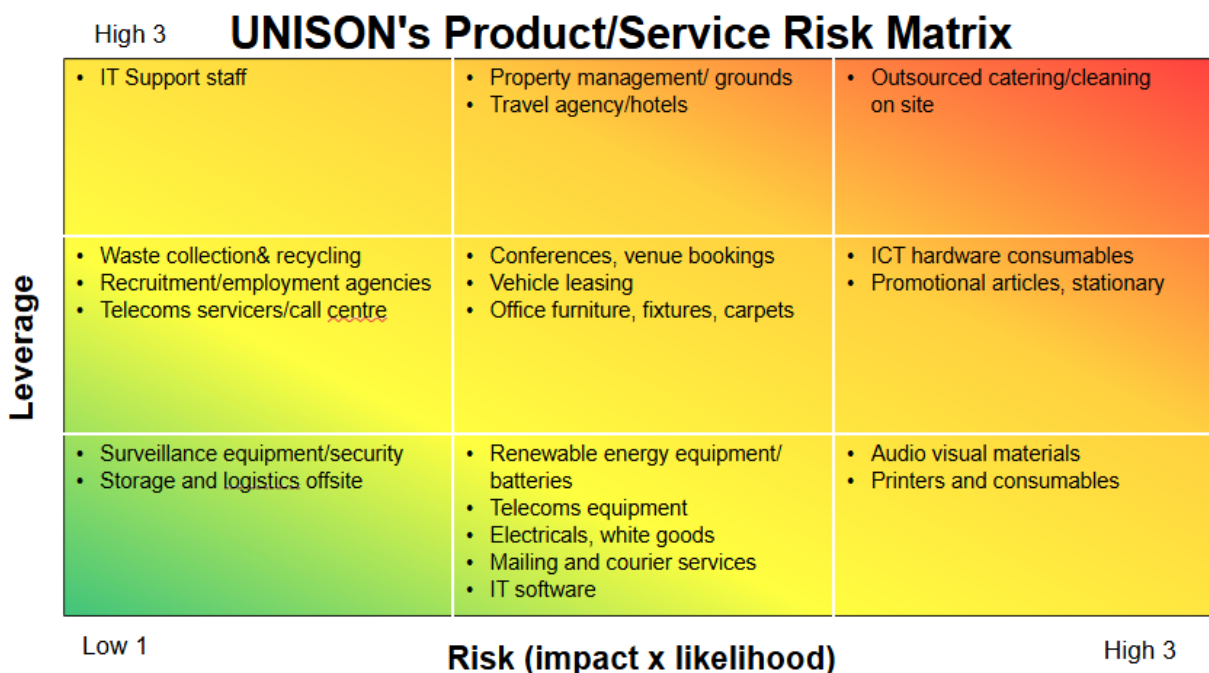
### **3. Assessing and managing risk**

3.1 No violations of human or labour rights were identified among our direct contractual partners. The main potential risk identified at Tier 1 relates to wage payments for catering and cleaning service contractors on our premises (see Figure 3.2), where pay could fall below the Real Living Wage. To prevent this, the procurement team has standard processes to notify relevant suppliers of the annual Real Living Wage update and request timely adjustments.

UNISON understands that its largest exposure to modern slavery and human

trafficking will come from its third-party supply chains - Tier 3 and beyond. During the latter half of 2025 the procurement team, supported by the modern slavery advisory group and senior management reviewed our existing Modern Slavery risks. The previous focus on organisational risks shifted to types of risks to workers including state-imposed forced labour. The updated overview, Annex I, will be published alongside our Modern Slavery Statement and on our International Campaigns page.

Figure 3.2



3.2 We also reviewed our product and service risk classification methodology.

Figure 3.2 consists of the main products and services we procure.

UNISON considered all human and labour rights risks in its supply chain, including indirect suppliers and lower tiers. The risk assessment (x-axis) is based on a combination of magnitude of impact and likelihood.

Magnitude of impact was assessed based on a combination of the known salient risks within industry supply chains and commodity types, their likely locations and nature of workforce and recruitment model. That assessment was gathered in the United Kingdom University Purchasing Consortium's (UKUPC's) [Responsible Procurement Commodity Mapping Tool](#). The UKUPC tool is indicative of risks and aligned to major international labour, ethical, and sustainability frameworks, particularly: UN SDGs, ETI Base Code, ILO Conventions and UNGPs. The tool

further includes market research and stakeholder consultations<sup>1</sup>.

Likelihood is based on the percentage of UNISON spend/utilisation rate of the commodity/service out of our total annual budget.

Leverage (Y-axis) consists of a combination of factors such as:

- Influence on direct contractual relationship; e.g. length of supplier relationship and supplier size in relation to UNISON
- Which tier the risk is likely to be in, i.e. Tier 1-2 or deep in the supply chain
- Reports of violations of freedom of association and associated levels of collective bargaining agreement power in the company and/or industry

3.3 Our purchasing leverage is generally limited. We can have meaningful influence in areas like contracted staffing, but far less in sectors such as IT hardware, where opaque global supply chains and our relatively small spend restricts our impact. Even so, we continue to exert influence where possible through joint, coordinated initiatives.

Many potential risks to workers are associated with our ICT supply chain and therefore we undertook a risk assessment together with Electronics Watch specific to the brands we predominantly use (Apple, Lenovo and Samsung). Based on the product specifications we provided, public supplier lists and country forced labour risks, Electronics Watch identified high or very high risks to workers of component suppliers in Vietnam, India and South Korea for potential exposure to deception about toxic chemicals and forced overtime.

At Chinese component suppliers the suspected issues were deception about toxic chemicals and forced overtime; forced student workers; state-imposed forced labour; and restrictions on the right to resign.

Regarding mineral extractions, risks were identified in the Democratic Republic of Congo with suspected key violations such as abusive termination of employment; discrimination in hiring & occupation; freedom of association and the right to collective bargaining; legal wages; living wages; and recruitment & employment conditions. Investigations on potential and suspected violations are still ongoing.

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<sup>1</sup> Contributing stakeholders to the UKUPC development consortium: Collaboratively developed by APUC (Advanced Procurement for Universities & Colleges), LUPC (London Universities Purchasing Consortium), NWUPC (Northwestern Universities Purchasing Consortium), EAUC (Environmental Association for Universities and Colleges), HEPA (Higher Education Procurement Association), Various HE/FE sector procurement and sustainability leaders, NUS and other student associations and People & Planet.

3.4. As a next step, the risk matrix, figure 3.2 will be integrated into the revised due diligence process and prevention and mitigation measures for the high and medium rated products/services will be developed throughout 2026.

3.5 We continue to update and review this matrix as part of an ongoing process within procurement and at least annually with the modern slavery advisory group. While we already support investigations into potential labour and human rights concerns, we aim to improve the supplier data we collect and expand our scrutiny beyond Tier 1 suppliers—starting with electronics.

#### **4. Due Diligence**

4.1 UNISON's business model is designed to represent all our members wherever they work and whatever they do and campaigning for the services they provide. Therefore, gaining value for money, including on price, is an important factor in how we operate. However, in line with our Responsible Procurement Policy, contract award decisions are not based only on price but include other relevant evaluation criteria, such as ability to meet operational requirements, social and environmental impact, member priorities and long-term value add.

UNISON is committed to doing all it can to prevent slavery and human trafficking within any part of its business or its supply chains. The union strives to achieve this through its recruitment policies and procedures and supplier due diligence framework.

4.2 The union's supplier due diligence framework requests information from potential suppliers to assess their suitability and provide evidence of their compliance with labour standards, the Modern Slavery Act and the Asylum & Immigration Act, as well as covering other areas of company information, attitude towards unions, policies and procedures. This enables the procurement team and budget holders to identify and assess any potential risks.

4.3 For third-party suppliers, our priority is to focus on high-risk commodities as per our risk matrix in 3.2. For contracts at high risk of modern slavery, our suppliers' human resource policies and practices are assessed throughout the procurement process by an in-depth supplier questionnaire and during tender interviews and supplier visits as appropriate. We collaborate strategically with others, such as Electronics Watch, to concentrate on our resources and increase leverage.

We continually review our vetting procedures and information provided by our

suppliers and we will review our Supplier Due Diligence Framework in 2026.

4.4 Where actual risks have been identified, through worker monitoring at supplier sites investigated in partnership with Electronics Watch, we take a collaborative approach. This means engaging with our contractual partners, stakeholders and industry forums to ensure that coordinated action is taken, including supporting worker-driven remediation. Going forward, an account of such investigations and status update will be shared as part of this statement.

4.5 Beyond our remedial efforts in collaboration with Electronics Watch we have yet to develop grievance mechanisms within our supply chain. UNISON is, however, coordinating the development of a grassroots toolkit for unions and labour rights NGOs to hold the relevant company(s) to account.

## **5. Training**

5.1 Modern slavery awareness is included within our staff induction booklet as well as staff induction training, to engage with all new staff on modern slavery issues from the outset of their employment at UNISON. UNISON runs biannual induction courses for new staff and modern slavery is included in combination with an introduction to UNISON's procurement and due diligence processes. In Q2 2025, feedback was reviewed and the training materials were updated, focusing on awareness of risks in our product supply chain, premises and events. Examples of UNISON members were included to highlight vulnerabilities and relevance to our mission as a union. The training was delivered in its revised form to 30 new starters.

5.2 Tailored training for Human Resources is planned for Q2 2026, focusing on signs of modern slavery and how to report suspected cases.

5.3 An introductory training for key suppliers on modern slavery is planned for 2026.

## **6. Monitoring and Evaluation**

6.1 Our priority continues to be to understand our supply chains, identifying areas of greater risk and vulnerability of workers and influencing them where possible.

UNISON has an internal modern slavery advisory group with the key purpose to review relevant policy changes and set key performance indicators and assess

progress made against these, to drive and monitor continuous improvement in the union's practices in this area. This statement has therefore been developed in consultation with this group.

UNISON's Finance and Resource Management Committee (FRMC) is tasked with reviewing annual progress and agreeing new KPIs and the Chair of the FRMC signs UNISON's Modern Slavery Statement. The International Committee is also informally consulted on progress.

We aim to further develop our performance measures to support continuous improvement. For example, an annual summary and review of UNISON's engagement with our monitoring partner Electronics Watch (EW) was discussed with the modern slavery advisory group and the following learning opportunities were identified:

- It is difficult to follow the EW process on investigation without previous education of modern slavery issues of suppliers.
- Criteria for ongoing supplier performance assessment need to be developed.
- Contract management must be included as a key phase in Human Rights and Environment Due Diligence (HREDD) framework.

Table 6.2 Progress against 2025 Key Performance Indicators (KPIs)

KPIs for 2025, as published in 2024 statement	*	Actions taken during 2025
Hire Sustainability Project Manager as dedicated resource to lead on regular reviews of policies, processes and tools.		Hired, contract ends 30 September 2026.
Undertake biennial review of supplier questionnaires.		Questionnaires consolidated and revised.
Undertake annual review of Responsible Procurement Policy.		Phase I review completed with suggestions for restructure and refinement. Phase II in 2026.
Undertake Modern Slavery (MS) risk review.		Comprehensive MS risk review undertaken. New worker centric risks (Annex 1), medium term goals, strategic initiatives and KPIs established (see table 6.3).
Undertake annual review of Supplier Code of Conduct.		Reviewed, minimal changes required.
Biennial review of UNISON's contract terms template.		Review of contractual terms started in Q4 2025.
Regularly review and record contractual changes related to Real Living Wage payment centrally.		Recording process and central record created and team members inducted accordingly. Update alerts to regions standardised in line with annual Real Living Wage increase.
Automate supplier due diligence elements in our e-procurement system 'In-Tend' to increase consistency in flagging up concerns and weighting of responses in future.		Due Diligence questions uploaded to In-Tend with preparations for automated scoring and issue flagging in process.
Develop register for potential and actual MS supplier issues for reporting and escalation to modern slavery advisory group.		Register for actual and suspected human rights issues in UNISON's supply chain developed with reporting to modern slavery advisory group.
Set up central records to ensure training rolls out to all procurement team members annually.		Central CIPS training record was created and updated regularly.
HR to revise the due diligence process for using agency workers and agency selection.		Agency selection and HR due diligence processes have been surveyed and will be integrated into HR training.
HR to map regional use of agencies including: job roles, agency details and number of staff employed through them.		A new record is being developed for retrospective monthly updates across all regions and departments.

HR and Procurement to identify relevant job roles and articulate criteria specific to MS awareness and prevention to be included at JD design and recruitment stages.	UNISON's relevant internal committee (TAG) is reviewing suggested roles and JDs for MS prevention criteria integration by Q2 2026.
HR to receive introduction to Modern Slavery Training.	While Modern Slavery Training specifically to HR was deferred to 2026, Modern Slavery awareness training is routinely included in the induction for all staff.
Planning of effectiveness review of the 'Branch Procurement Toolkit' for improved staff awareness monitoring.	Started, completion deferred to 2026.
Annual summary and review of EW engagement discussed with modern slavery advisory group to identify future learning opportunities.	Summary and recommendations were shared with modern slavery advisory group in Q4 2025.
Suspected human rights issues are investigated with suppliers on a case-by-case basis and in close coordination with EW.	Records for each suspected human rights issue have been established. Supplier engagement and evaluation are ongoing.
Review all of UNISON's existing communication on modern slavery (externally and internally).	Communications review internally completed, external review ongoing.
Commence developing a stakeholder map with a view to facilitating benchmarking in 2026 (internal and external).	Stakeholder map established for internal and external contacts, with good practice examples for Human Rights and Environment Due Diligence frameworks, tools and examples.

\*Progress level: **Green** - completed, **Amber** – partially completed, **Red** – deferred

Table 6.3 below seeks to summarize our strategic initiatives and the KPIs to monitor progress against our priority goals up to 2028. This 3-year plan is replacing the year-on-year progress update of previous statements, introducing time-bound KPIs.

Table 6.3 Goals 2026 - 2028, Strategic Initiatives and specific KPIs.

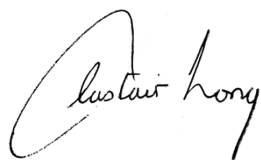
<b>GOALS</b>	<b>STRATEGIC INITIATIVES</b>	<b>KPIs</b>	<b>By</b>
UNISON's operational standards and policies are best practice aligned.	Review of Responsible Procurement Policy	Phase II review: Redraft created and signed off	Q4 2026
	Review of Supplier Code of Conduct	Revised CoC signed off	Q4 2026
	Contract terms are being redrafted to make them more legally robust and to better align them with values and objectives.	Redrafted contract terms in operational use	Q3 2026
		As contracts come up for renewal, ensure that they include UNISON's terms concerning MS obligations.	ongoing
MS due diligence processes are robust and implemented effectively	Due diligence framework integrated into organizational governance	Senior management representation in MS advisory group	Q4 2026
		New worker centric risks identified	Q1 2026
		Integration of MS risks into organizational risk register by internal audit	Q2 2027
		UNISON's relevant internal Committee (TAG) reviewed suggested roles and job descriptions for MS prevention criteria integration.	Q3 2026
		MS responsibilities are integrated into relevant job descriptions to ensure clear communication for newly created or existing roles.	Q4 2026
		Robust checks and balances are in place to align with Living Wage Foundation guidance.	ongoing
	Comprehensive Due Diligence Framework integrated into operations	Revised due diligence questionnaires available to staff alongside clear financial thresholds and risk guidance.	Q4 2026
		Develop staff guidance for purchasing high risk category commodities as per new risk matrix.	Q4 2026

		Tender questions and scoring revised and standardized including human and labour rights alongside environmental and commercial concerns.	Q1 2027
	Supplier contract management processes are as robust as onboarding processes	Develop a section in the responsible procurement policy on how we assess supplier responsiveness on suspected issues and our follow-up processes.	Q3 2026
		Develop a responsible exit strategy for suppliers.	Q3 2027
		Develop a section in responsible procurement policy focusing on shared responsibility.	Q3 2026
Improve communication, transparency and training on MS issues	Increase awareness of anti-slavery efforts across the organization.	Publish UNISON's MS statement in alignment with 2025 Home Office guidelines.	Q2 2026
		Publish sustainability website for UNISON including efforts on modern slavery prevention.	Q4 2026
		Effectiveness review of the 'Branch Procurement Toolkit' for improved staff awareness monitoring.	Q3 2027
	Develop and roll out training on MS.	MS training specifically for human resources (HR) team members are delivered. Contract Managers and specific roles identified received in-depth training.	Q3 2026
		MS introduction is provided to all new staff as part of induction.	ongoing
Increase visibility of MS risks in our operations and our supply chain.	Progress supply chain mapping	HR to map regional agencies including: job roles, agency details and number of staff employed through them to undertake due diligence.	Q4 2026
		Key ICT suppliers are supported to fill in Electronic Watch's (EW) Factory Disclosure Form (FDF).	Q2 2026

	Progress follow-up of potential and actual human rights in supply chain issues.	Join EW affiliate working group on effective follow up and evaluation of supply chain issues.	Q2 2026
		Suspected human rights issues are investigated with suppliers on a case-by-case basis and in close coordination with EW.	Ongoing
		High risk commodities and services are identified and reviewed regularly.	Ongoing
Build effectiveness measures for MS prevention.	Due diligence effectiveness review	Review of effectiveness of risk prevention.	Q4 2027
		Review of effectiveness of risk identification and mitigation.	Q1 2028
	Development of grievance mechanism and remediation processes beyond electronics.	Review of effectiveness of collective remediation.	Q1 2028
		Review of effectiveness of international Trade Union engagement on grievance identification.	Q3 2027
UNISON is effectively influencing UK and international policy towards enhanced prevention of MS.	UNISON is leading on campaigning for Just Transition and raise awareness of the multiple negative impacts of climate change on workers' rights.	Specifics of this KPI have yet to be developed, suggestions are for to be part of an international collaboration to monitor union busting and Freedom of Association infringements.	Q3 2027

This statement has been approved by the union's Finance and Resource Management Committee.

**Signed:**



**Alastair Long, Chair of Finance and Resource Management Committee (NEC member)**

## Annex 1: UNISON's revised Labour and Human Rights Risks, 2026

1. **Actual or potential victims of forced labour and human rights abuses in UNISON's supply chain:** Globally, modern slavery risks continue to evolve, and forced labour in the private sector is growing. Suppliers or subcontractors failing to uphold labour standards set out in UNISON's Code of Conduct (which is based on ILO Conventions and Ethical Trading Initiative's Base Code) may expose workers to unacceptable conditions and, at worst, forced labour.
2. **Lack of effective remediation:** Where human rights abuses occur, remedial efforts may be insufficient or fail, leaving victims vulnerable and failing to prevent future abuse.
3. **Union busting and discrimination:** The commonly adverse climate for worker unionisation puts organisers at risk and hinders collective bargaining, improvements in working conditions and effective grievance mechanisms.
4. **Unsafe working conditions and environmental hazards:** Due to the climate crisis, extreme weather events are becoming more frequent. Workers are facing additional and more severe health and safety risks, including inadequate protective measures or heightened exposure to environmental dangers.
5. **Failure to detect indicators of modern slavery:** Gaps in due diligence processes or staff awareness may result in warning signs being overlooked, allowing exploitation to persist.
6. **State-imposed forced labour:** Workers may be subject to coercive practices mandated by state authorities, limiting their freedom and ability to refuse work. In such challenging environments, for example Xinjiang, China, where standard audits may not be possible, the increasing use of AI poses new risks of exploitation and monitoring gaps as data lacks granularity. These automated systems may offload high-risk suppliers, contrary to the UNGPs, rather than seeking to engage and use leverage to improve their practices.

7. **Real Living Wage minimum not implemented correctly:** Some subcontracted workers in our operations or supply chain such as short-term workers on UNISON premises may not be receiving the equivalent of the Real Living Wage.
8. **Recruitment fees and related costs passed on to workers:** As more people migrate for work, vulnerabilities increase. Instead of being borne by employers, recruitment fees and related costs may be transferred to workers, which may lead to debt bondage and human trafficking in UNISON's supply chain and contractors on site.
9. **Lack of capacity to implement, monitor and review due diligence processes or train others to do so, culminating in reputational damage from identified risks:** Members or external stakeholders may identify shortcomings in UNISON's due diligence, for example in promotional goods. This could lead to loss of trust and reputational damage, undermining our ethical commitments, moral licenses to operate and ultimately causing loss of membership if not matched with robust systems and processes, supply chain management and dedicated resourcing.