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See no evil, hear no evil, speak no evil?

Barriers to modern slavery risk management in supply chains:
an empirical investigation

Maryam Lotfi¹, Helen Walker
Cardiff Business School, Cardiff University, UK

¹ Corresponding author: lotfim@cardiff.ac.uk

Abstract

Countries have enacted laws requiring companies to prevent modern slavery. Many companies have pledged to ensure that their supply chains are free from modern slavery, but the scale of the issue remains substantial. This paper seeks to identify the barriers that prohibit the detection, prevention and remedying of modern slavery incidents in supply chains. A conceptual model is developed that draws on literature on supply chain risk management and barriers to modern slavery. 22 semi-structured stakeholder interviews were conducted to examine common challenges and analysed using NVivo. We distinguish between barriers at different levels - macro, supply chain and organisational - and before and after a modern slavery incident happens - pre-incident and post-incident phases. New barriers emerged in the pre-incident phase, including disparities in terminology, a lack of global law, and limited power in the supply chain; and in the post-incident phase, a lack of remediation frameworks emerged. An abductive approach allowed a further iteration of the conceptual model to be developed after the empirical phase. Modern slavery is notoriously difficult to research as companies fear exposure, and we make a novel contribution by collecting primary data from 22 stakeholders engaged in the management of modern slavery.

Key Words: Modern Slavery, Supply Chain Management, Risk Management

Article classification: Research paper

1. Introduction

This paper seeks to respond to why modern slavery persists in the supply chains of western companies despite their efforts, through investigation of the barriers to modern slavery risk management.

There are laws such as the Australian Modern Slavery Act [2018], the UK Modern Slavery Act [2015] (which also includes a section called Transparency in Supply Chains, TISC), and the US-California Transparency Act [2010]. These legislations have sought to influence supply chains by requiring those firms in scope to report on modern slavery risks in their supply chains (Pinnington, Benstead, & Meehan, 2023).

However, modern slavery persists at a daunting scale, drawing negative attention to the supply chains of well-known western companies from time to time. It may have even increased in recent years due to economic pressures created by COVID. Revelations continue of incidents of modern slavery in supply chains in the news, but these are only the tip of the iceberg. The supply chains of Primark and Topshop in 2018 were linked to modern slavery allegations in Bangladesh factories², and two years earlier Syrian refugees were found to be working in appalling conditions within garment factories across Turkey³. Some 49.6 million people worldwide were estimated to be victims of modern slavery in 2021, of which 27.6 million, including 3.3 million children, were forced labour (ILO 2022). Moreover, in 2017 alone, the G20 countries bought products worth \$354 billion at the risk of modern slavery, particularly in the electronics (\$200 billion) and apparel (\$128 billion) sectors.

Efforts to address modern slavery in supply chains have been mixed (LeBaron & Lister, 2021; Simpson et al., 2021) and this research seeks to understand the challenges that companies face. We conceptualize focal companies' efforts against modern slavery from a *supply chain risk management* perspective. The research question we aim to investigate in this research is:

“What are the barriers to modern slavery risk management in global supply chains?”.

² Independent, 2018, “Topshop and Primark could be hiring children aged 14 in supply factories”. Available at: <https://www.independent.co.uk/life-style/fashion/child-labour-primark-topshop-sustainable-fashion-industry-m-and-s-select-committee-parliament-a8654026.html> [Access date: 20 March 20220]

³ Ethical Trade Initiative, 2020, Syrian refugees working in Turkey's garment sector. Available at: <https://www.ethicaltrade.org/what-we-do/eti-initiatives/syrian-refugees-working-turkeys-garment-sector#:~:text=Turkey%20has%20seen%20an%20influx,conditions%20and%20very%20low%20wages.> [Access date: 21 April 2022]

The research makes several contributions. First, we explore barriers to modern slavery supply chain risk management at different phases and levels and develop and refine a conceptual model. Second, modern slavery is notoriously difficult to research as companies fear exposure, and we make a novel contribution by collecting primary data from 22 stakeholders engaged in the management of modern slavery. Finally, we offer practical advice for policy makers, supply chain managers and NGOs seeking to improve the detection and response to modern slavery incidents in supply chains.

The following section reviews recent literature on the supply chain risk management process and barriers to modern slavery in global supply chains. The third section outlines the methods and data collection. The fourth section presented the findings. The final section offers a discussion and conclusions highlighting limitations and further research prospects.

2. Literature Review

2.1. Modern Slavery and Socially Sustainable SCM

Sustainability has become a major element in supply chain management (SCM) with a primary focus on environmental sustainability. A vast amount of literature has prioritised environmental sustainability within SCM with predominantly green product design and waste management (Miemczyk & Luzzini, 2018; Nakamba, Chan, & Sharmina, 2017). Meanwhile social sustainability has been severely under researched (Crane, LeBaron, Phung, Behbahani, & Allain, 2018).

Socially sustainable SCM practices refer to the responsibility organisations have over the impacts they impose on their stakeholders (Miemczyk & Luzzini, 2018). Social sustainability issues involve matters of health and safety, working conditions, child labour, forced labour and modern slavery (Benstead, Mwesiumo, Moradlou, & Boffelli, 2022; Cole & Aitken, 2019). Emerging literature and investigative reports have linked many global brands to ethical violations in their supply chain operations (LeBaron, 2021; Macchion et al., 2018). Therefore, companies have begun implementing socially sustainable practices across their supply chains. As social sustainability is still relatively under researched, the effectiveness and the impacts of those practices are still debated by academics (Anisul Huq, Stevenson, & Zorzini, 2014). Modern slavery has been a topic of research and debate within the context of social sustainability in global supply chains. The term is defined as:

“The exploitation of a person who is deprived of individual liberty anywhere along the supply chain from raw material extraction to the final customer for service provision or production” (Gold et al., 2015, p.5).

According to Fransen and LeBaron (2019) modern slavery must not only be associated with human trafficking but also victims forced into dangerous working environments, for minimal pay, and subjected to debt bondage from their employers. Modern slavery can also occur in the labour supply chain to account for workers who are exploited through recruitment, then charged continuing additional fees that they cannot pay off. It also includes chattel slavery where enslaved people and their children become the personal property (chattel) of the slave owner over generations. These variations of modern slavery have in common depriving a person of their liberty, in order to oppress and exploit them for personal or commercial gain.

2.2. Theoretical framing: Modern slavery and supply chain risk management

In the supply chain risk management literature, there is little on social risks in comparison to financial risks (Cunha, Ceryno, & Leiras, 2019). SC risk management research has largely neglected sustainability related risks (Hofmann, Busse, Bode, & Henke, 2014). If a supply chain involves social risks, this can lead to huge financial and reputation loss (Busse, Schleper, Weilenmann, & Wagner, 2017) and have big impacts on firms in the supply chain (Hofmann et al., 2014). Human rights issues such as modern slavery and child slavery are included as social risks in supply chains (Busse et al., 2017; Cunha et al., 2019; Giannakis & Papadopoulos, 2016).

There are also many references in the practitioner literature on companies managing the risk of modern slavery. For instance, International Finance Corporation, CDC Group Plc, the European Bank for Reconstruction and Development, and the UK Department for International Development have issued a ‘good practice note’ on “managing risks associated with modern slavery” for the private sector⁴. In the academic literature, “slavery risk is a firm's ex-ante likelihood of exposure to contemporary slavery incidents through its focal business or supply chain” (Cousins, Dutordoir, Lawson, & Neto, 2020). Our starting point is, therefore, seeing

⁴ ⁴ Managing risks associated with modern slavery, A good practice note for the private sector, available at: https://www.ifc.org/wps/wcm/connect/5e5238a6-98b3-445e-a2d6-efe44260b7f8/GPN_Managing-Risks-Associated-with-Modern-Slavery.pdf?CVID=mR5Bx5h&MOD=AJPERES [Access date: Nov. 2022]

modern slavery from the perspective of supply chain risk management (SCRM) (Sodhi & Lotfi, 2024).

Because supply chains are complicated and multi-national companies are ingrained in fragmented institutional frameworks, the conditions are perpetuated for modern slavery to continue (Stringer & Michailova, 2018). Outsourcing and subcontracting (LeBaron, 2014) are among the factors that enable slavery in supply chains. Although modern slavery can occur at any stage of the value chain, it is predominantly found in the labour intensive stages of production (Crane, 2013), where there are often smaller business with a limited ability to capture value, a disadvantage population, and geographical isolation. New (2015) highlights that contract employment is often found in the production focused parts of the supply chain, where the risks presented by employment agencies and gangmasters are often ignored.

When we consider risk management in supply chains, a number of conceptual models and frameworks have been put forward that identify types or categories of risk, internal and external risks, antecedents, drivers, responses, consequences, effects on financial and operational performance etc. For example, Fan and Stevenson (2018) have analysed the supply chain risk management literature to identify different characteristics. We sought to focus on risk management steps, phases, or processes in our review of supply chain risk management conceptual models in Table 1.

We also sought risk management models that focus on sustainability or social issues, and found relatively few. Hofmann et al. (2014) presents a sustainability-oriented supply chain risk management framework which includes identification, assessment, compliance, and interaction which introduces the functions of stakeholder involvement, transfer, supplier management and stakeholder management. Giannakis & Papadopoulos (2016) propose a risk management framework for sustainability-related risks, that includes identification, assessment, analysis, treatment, monitoring and control. The only social risk management framework we found was the work of Cunha et al. (2019) who consider identification and reaction phases.

Table 1. Characteristics in the supply chain risk management process

	Pre incident phase			Post incident phase		
Characteristics	Identification, Detection	Assessment (Analysis, Evaluation, Measurement)	Mitigation (Contingency plans, Event	Management (Controlling, Treatment)	Monitoring	Response, (Recovery, Remediation,

Authors			readiness, SC risk sharing)			Consequences, Learning)
Kleindorfer and Saad (2005)	✓	✓		✓		✓
Ritchie and Brindley (2007)						✓
(Manuj & Mentzer, 2008)	✓	✓	✓	✓		
Ponomarov and Holcomb (2009)		✓	✓			✓
Tummala and Schoenherr (2011)	✓	✓	✓		✓	
Hofmann et al. (2014)	✓	✓		✓		✓
Rangel, de Oliveira, and Leite (2015)	✓	✓		✓	✓	
Giannakis and Papadopoulos (2016)	✓	✓	✓	✓	✓	
Fan and Stevenson (2018)	✓	✓		✓	✓	
Cunha et al. (2019)	✓	✓		✓	✓	✓

Drawing on our review of characteristics in the supply chain management risk process, SC sustainability risk management (Giannakis & Papadopoulos, 2016; Hofmann et al., 2014) and more specifically SC social sustainability risk management (Cunha et al., 2019), we can identify two overarching steps or phases, although authors use differing terminology and group them differently. These phases are pre-incident and post-incident i.e., in our context, before and after a modern slavery incident happens somewhere in the SC. Some elements straddle both the pre- and post- incident phases, for example, one could argue that management of modern slavery occurs both pre- and post-incident.

- The pre-incident phase is concerned with identification, detection, assessment and mitigation, recognizing the risks and taking appropriate actions to prevent incidents.
- The post-incident phase is associated with management, monitoring and response, or the handling and recovery after an incident, to remedy the situation, make reparations and reduce any unwanted consequences.

From a focal company's risk management perspective, an 'incident' is not modern slavery somewhere in its supply chain – or even in its facilities. Instead, an incident is when the press, a whistle-blower or social media makes the occurrence of modern slavery public knowledge, potentially putting the company in disrepute.

The pre- and post- incident phases are best illustrated by an example, such as the 2019 Tesco Christmas card incident. As reported in the media⁵ and subsequently in the company's Modern

⁵ The Times, 2019, downloaded from: https://www.thetimes.co.uk/article/tesco-charity-cards-packed-by-chinas-prison-slaves-v9psp9fqx?--xx%20meta=denied_for_visit%3D0%26visit_number%3D0%26visit_remaining%3D0%26visit_used%3D0&--xx-mvt-opted-out=false&--xx-uuid=a190feb520f37d7fad56dfb4283bc265&ni-statuscode=acsaz-307

Slavery Statement 2019⁶, a six-year-old child in London opened a box of Charity cards purchased at this large UK grocery retailer in December 2019 and discovered a plea for help written in English: "We are foreign prisoners in Shanghai Qingpu Prison, China. Forced to work against our will. Please help us and notify the human rights organization." The retailer responded by saying they had only recently audited the supplier, thus raising questions about their auditing process.

In the pre-incident phase, it seems that Tesco made preventative efforts, but that these proved insufficient. Tesco issued a statement⁷ mentioning that *"We have a comprehensive auditing system in place and this supplier was independently audited as recently as last month and no evidence was found to suggest they had broken our rule banning the use of prison labour. If a supplier breaches these rules, we will immediately and permanently de-list them"*. There was a lack of disclosure within the supply chain and Tesco had a lack of visibility over their extended supply chains in the lower tiers. Tesco further added: *"We abhor the use of prison labour and would never allow it in our supply chain. We were shocked by these allegations and immediately suspended the factory where these cards are produced and launched an investigation. We have also withdrawn these cards from sale whilst we investigate."*

In the post-incident phase, Tesco explained in their modern slavery statement 2019/2020 p.15, *"Alleged use of forced prison labour at two sites in China. Following immediate unannounced investigations by three of our internal expert China team, we were unable to verify the allegations were correct. However, we identified a number of other concerns at the site including inconsistent record keeping and have since exited the site"* (Tesco Modern Slavery Statement 2019/20, p 15). Whether this was sufficient post-incident effort on the part of Tesco remains to be investigated.

Next, we review literature on barriers associated with the pre- and post-incident phases.

2.2.1. Barriers in pre-incident phase

[Access date: 3 Aug. 2022]

⁶ Tesco Modern Slavery Statement 2019, downloaded from <https://www.tescopl.com/media/755909/tesco-modern-slavery-statement-final-201920.pdf> [Access Date: 5 Sep. 2021]

⁷ Tesco Statement: Christmas card supply chain, 2019, available at: <https://www.tescopl.com/news/2019/tesco-statement-christmas-card-supply-chain/> [Access date: 3 March 2021]

In the following sections identifying pre-incident and post- incident phase barriers, we also group the barriers according to what levels the barriers occur at, differentiating between macro, supply chain, and organisational levels.

Macro level barriers

Lack of Enforcement

Over the last decade there has been an increase in legislation to tackle modern slavery, such as the UK Modern Slavery Act (2015). Such legislation does not include binding standards or require evidence of action, it instead relies on collaborative action from firms and their supply chains to make any significant changes (Crane et al., 2018; Meehan & Pinnington, 2021). Subsequently, due to limited enforcement of regulation and lack of accountability, businesses and manufacturers do not have an incentive to prevent modern slavery in their supply chains.

Currently, companies manage the extent to which they disclose certain information about the labour standards within their supply chains, which potentially could result in symbolic disclosure without sufficient action to follow (Schaper & Pollach, 2021). Benchmarking the level of reporting that companies engage in could lead to promising results (Stevenson & Cole, 2018). LeBaron and Rühmkorf (2017) suggest more stringent regulation has the potential to steer business practices when there is a possibility of reparations.

Looking ahead, the UN and EU are developing Mandatory Human Rights Due Diligence (MHRDD) laws, which will carry legal repercussions for companies which do not comply. The EU commission stated that voluntary measures are no longer enough⁸. Quijano and Lopez (2021) suggest that effective due diligence legislation must contribute to prevention, accountability, and remedy of human-rights abuses. Therefore, it is expected that firms will take a more active role in the preventative measures as they may be held accountable if their supply chain is found to violate human rights.

Supply chain level barriers

Traditional Business Models

⁸ Shift, 2020, Accountability as part of Mandatory Human Rights Due Diligence, Available at: https://shiftproject.org/wp-content/uploads/2020/10/Shift_mHRDD_Accountability_October2020.pdf [Access Date, 21 Aug. 2021]

Traditional business models often entail complex and long global multi-tier supply chains, as production is outsourced and offshored to reduce costs. This can present a barrier to the prevention and detection of modern slavery. Companies place unrealistic timelines on their suppliers and demand the lowest prices for production of goods, often forcing suppliers to lean towards exploitative behaviour such as mandatory overtime and unpaid wages to remain competitive (Allain, Crane, LeBaron, & Behbahani, 2013; LeBaron, 2014). If supply chains are narrower and shallower, it is easier for lead firms to hold supply chain partners accountable. Shorter supply chains reduce the number of relationships at play, thereby limiting the potential for slippage between the desired standards and those on the ground (Mosley, 2017). As an alternative to traditional business models, worker-driven initiatives can improve labour standards and redistribute value along the chain (LeBaron, 2020). This is done by worker-to-worker education and providing complaint mechanisms which increase worker power in the supply chain. This type of business model innovation can improve wages, reduce assault, and forced labour (Benstead, Hendry, & Stevenson, 2021; LeBaron & Rühmkorf, 2017). Modern slavery may be influenced by consumers and business customers along the supply chain. Oelze, Gruchmann, and Brandenburg (2020) found that customer demand may not have an impact on business decisions that influence modern slavery. However, an example from Anti-Slavery International shows how organisational practices may be changed based on the right of the consumer to know all the information about the purchased products (Caruana, Crane, Gold, & LeBaron, 2021).

Lack of Supply Chain Visibility

Outsourcing and subcontracting has made it difficult to trace goods made by victims of modern slavery especially in the lower tiers of the supply chain (Allain et al., 2013; Crane, LeBaron, Phung, Behbahani, & Allain, 2022; Meehan & Pinnington, 2021). Technology may go some way to improving visibility in supply chains. Blockchain technology can improve supply chain visibility of employment, preventing exploitation within the recruitment process (Christ & Helliard, 2021; Kshetri, 2021). Blockchain records might also assist detection of modern slavery if they become part of annual financial auditing. Gunasekaran and Subramanian (2018) and Kshetri (2021) propose the use of blockchain in online apps to provide workers with information on labour rights in various languages and give access to independent grievance mechanisms. However, such technological solutions are not widespread and still in development.

Supply chain / organisational level barriers

Some barriers can operate at both the supply chain and organisational levels, such as ‘ineffective codes of conduct’ and ‘flawed audits’ below.

Ineffective Codes of Conduct

Codes of conduct have been used as a tool to prevent modern slavery risk by shifting suppliers to a commitment-based approach. There is currently little research on the effectiveness of codes of conduct for three reasons: (1) studies of the impact of codes have almost exclusively been limited to qualitative studies of a small number of firms, and these should be complemented with more quantitative research. (2) the few quantitative studies have relied on corporate auditing methods that can present quality problems. (3) Codes have uneven impacts i.e. they can improve outcome standards (health and safety, working time and wages) but not process rights (trade union rights and discrimination). Few studies have empirically studied the impact of codes of conduct at the production point in developing countries, where many modern slavery incidents happen (Egels-Zandén & Lindholm, 2015). Furthermore, the diversity of code of conducts and auditing protocols can allow firms to engage in “forum shopping” and to privilege some aspects of the code (such as excessive working hours) at the expense of others (such as freedom of association) (Anner, 2022).

Flawed audits

Audits may be unreliable, especially those conducted by “commercial actors” such as corporate internal auditors, specialist auditing firms or semi commercial NGOs which profit from providing the service. Auditors allow firms to choose which aspects will be audited, so firms can choose to not audit areas where they are aware of existing issues (Fransen & LeBaron, 2019). Auditors often rely on data provided by management with little or no triangulation or cross checking, visits are announced and occasional, and do not include crucial off-site interviews with workers and labour union representatives (Egels-Zandén and Lindholm, 2015). Auditors may also encounter local managers who keep a second (accurate) set of records or give “vacations” days to keep vocal workers from sharing information with inspectors (Mosley, 2017). Auditors are more inclined to provide a favourable report to ensure future business (LeBaron, 2020). Auditors are not required by law to publish their findings, which may prevent remediation even if modern slavery is detected (Fransen & LeBaron, 2019; LeBaron, 2020). Therefore, social auditing may be seen as the privatisation of labour standards and may not

provide favourable mechanisms for detecting modern slavery. Instead, it may serve as a tool for companies to imitate detection in a ‘tick-box’ approach.

There is a need for independent mechanisms which would enable trustworthy detection. Benstead et al. (2021) propose that NGOs partner with firms for an annual fee to guide and monitor suppliers on the ground. Ensuring that the NGO’s role does not transform into a for-profit service similar to the auditing industry would be beneficial. The NGO’s role as mediator and support mechanism would provide impartial development and enable a more collaborative approach to detection of modern slavery risks (Gold, Trautrim, & Trodd, 2015; Plambeck & Taylor, 2016). Currently, there is no significant regulation which holds recruitment or auditing agencies accountable for their contribution to modern slavery (Crane et al., 2018; LeBaron, 2020). Both industries utilise significant subcontracting making it difficult to obtain traceability of records and establish accountability (Benstead et al., 2021; Crane et al., 2022). If the auditing industry were regulated it would ensure that audit records are accessible to the public and workers, and auditing companies could be held accountable if violations were undisclosed (Fransen & LeBaron, 2019).

Organisational level barriers

Lack of Freedom of Association and Collective Bargaining

Lack of freedom of association has been identified as a barrier both in the prevention and detection of modern slavery. Freedom of association and collective bargaining are fundamental labour rights which form part of company codes of conduct (Kuruville & Li, 2021). Companies which do not ensure the implementation of these labour rights in their supply chains are enabling an environment in which workers are unprotected and exposed to risk of modern slavery. According to Allain et al. (2013) workers and activists who seek labour rights in lower tiers of supply chains may be subject to daily levels of intimidation and violence. Hence, low labour protection rights can be considered as a distinct barrier to preventing modern slavery in global supply chains (Bair, Anner, & Blasi, 2020; Morris, Jenkins, & Donaghey, 2021). If that right is taken away or not enforced and victims fear repercussions and violence, those violations cannot be dealt with. According to Morris et al. (2021) this forces workers to rely on international mechanisms and NGOs to receive help at local level. Despite many worldwide brands advocating for unions in their modern slavery statements, unionisation rates have fallen

globally. For example, in the UK, union membership has fallen down from 32.4% in 1995 to 22.3% in 2022 (Trade Union Membership, UK 1995-2022: Statistical Bulletin)⁹.

Labour unions are integral to ensuring worker rights and not only provide the opportunity to report exploitation safely in the detection stage but additionally, ensure that the reports are acted upon by employers in the stage of remedy and response (Benstead et al., 2021).

Lack of Self Reporting

A further barrier at the organisational level is a firm's reluctance to self-report. Media reports on working conditions often portray firms in a negative light. It is rare to find media coverage on companies which are making positive progress on tackling modern slavery. As a result, companies may be hesitant to report certain findings on modern slavery in their supply chains which may affect their public image. According to Flynn (2020) the size of the firm and industry also contributes to insufficient reporting.

2.2.2. Barriers in the post incident phase

Compared to research focused on the pre-incident phase, there has been less research on the post-incident phase (Benstead et al., 2021) and all the previous research we identified is focused at the macro level.

Macro level barriers

No Support Systems for Victims

There is a lack of support systems in place, and victims often hesitate to come forward after a modern slavery incident for fear of reprisals. Support for victims following a complaint is crucial to ensure they do not fall back into exploitative environments (Benstead et al., 2021; LeBaron, 2020). Current due diligence mechanisms are focused on risk assessment and do not ensure adequate compensation and support for victims (LeBaron, 2020).

Political Constraints

⁹ Trade Union membership, UK 1995-2022: Statistical Bulletin, 24 May 2023, Available at: https://assets.publishing.service.gov.uk/media/646dcc477dd6e7000ca9b289/Trade_Union_Membership_UK_1995-2022_Statistical_Bulletin.pdf, [Access date: 18 Aug. 2023]

In some countries, political constraints and immigration policies prevent effective response and remediation. Victims of modern slavery may be treated as criminals, and are less likely to come forward due to the fear of deportation, legal repercussions, and prosecution (Crane, 2013). These vulnerable people are often migrants, and immigration cases can go through a significant investigation. Victims will often return to their countries and never receive compensation or support for the harm that was caused to them (Benstead et al., 2021; LeBaron, 2021).

Lack of National Referral Mechanisms

National Referral Mechanisms are a framework used to detect modern slavery and refer victims to the appropriate authority to receive support (UK Government 2017). There is a lack of national referral mechanisms in destination countries, and victims may be unable to come forward and receive help (Kuruvilla & Li, 2021; LeBaron, 2020), preventing detection of incidents and the appropriate remediation process to take place.

Summary of the barriers to modern slavery from the literature

In sum, our review of modern slavery literature has identified a number of barriers in the pre and post incident phases, presented in Table 2. From Table 2, we have developed an initial conceptual model drawing on the literature of the barriers to modern slavery risk management in the pre and post incident phases (Figure 1). It is apparent that previous research has identified more barriers in the pre-incident phase, and the post-incident phase is relatively under-researched. The model also shows that barriers can occur at different levels (macro, supply chain, and organizational), with some barriers straddling different levels (e.g. flawed audits). Similar to the idea of factors at the macro level, Crane (2013) suggested that multi-national companies use “slavery management capabilities” to take advantage of industry, regulatory, geographical, and socio-economic factors to enable modern slavery to take place.

We shall return to this initial conceptual model later in the paper, to see which barriers are confirmed or not identified in our empirical study and reflect on any new barriers that emerge from the data. An abductive approach provided the opportunity to remain sensitive to the modern slavery context and for novel themes to emerge from the data (Gehman et al., 2018), and there was a process of iterative reflection on supply chain risk management phases, barriers to modern slavery literature, and empirical data.

Table 2. Barriers of modern slavery risk management in the pre and post incident phases

Phase of risk management	Level	Barriers	References
Pre-incident	Macro	Lack of enforcement of laws	LeBaron and Rühmkorf (2017) Crane et al. (2018) Flynn (2019) Flynn and Walker (2021) Morris et al. (2021) Meehan and Pinnington (2021)
	SC	Traditional business models	LeBaron (2020)
	SC	Lack of supply chain visibility	Benstead, Hendry, and Stevenson (2018) Stevenson and Cole (2018)
	SC / Org	Ineffective codes of conduct	Locke (2013) Lund-Thomsen and Lindgreen (2014) Crane et al. (2018)
	SC / Org	Flawed audits	Stevenson and Cole (2018) Mosley (2017) Egels-Zandén and Lindholm (2015)
	Org	Lack of freedom of association and collective bargaining	Locke (2013) Mosley (2017) LeBaron (2020)
	Org	Lack of self-reporting by businesses	Meehan and Pinnington (2021) LeBaron (2020)
Post-incident	Macro	No support system for victims	Martin-Ortega (2017) LeBaron (2020)
	Macro	Political constraints	Mosley (2017) LeBaron (2020)
	Macro	Lack of national referral mechanisms	LeBaron and Rühmkorf (2017) LeBaron (2020)

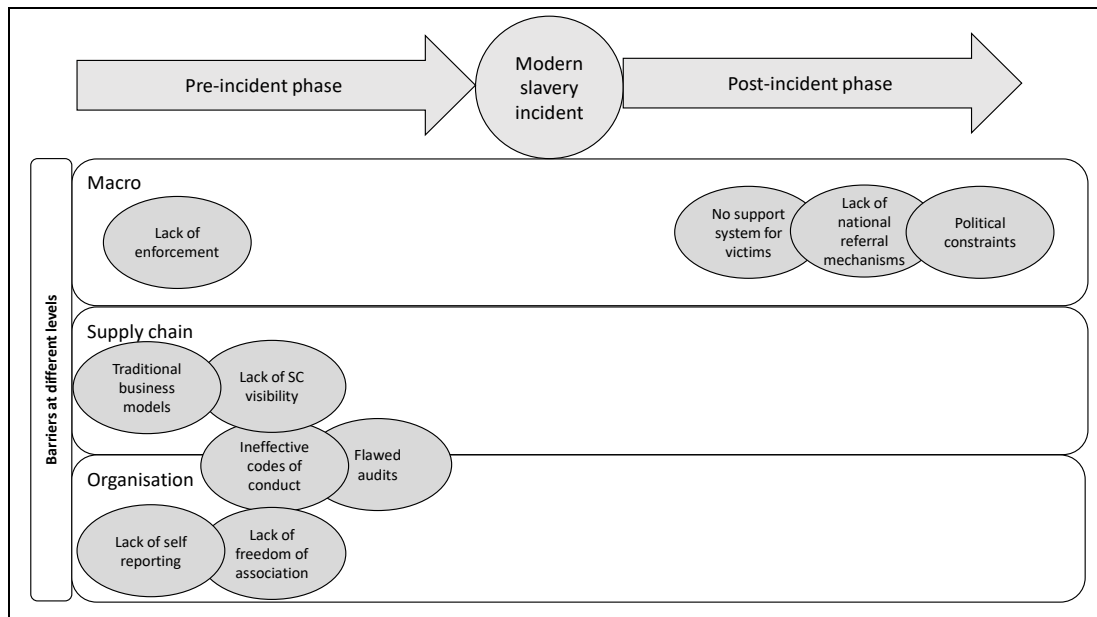


Figure 1. Initial conceptual model of barriers to modern slavery risk management in the pre and post incident phases

3. Method

Due to the exploratory nature of this research project a qualitative approach was identified as most suitable. This research aimed to explore the barriers of modern slavery risk management in supply chains through semi-structured interviews to understand barriers from the perspective of expert stakeholders. Due to the sensitivity of issues related to modern slavery, collecting primary data is challenging (Crane et al., 2022).

Interviews were conducted by the first author during the period of September 2021 - August 2022 and included a pre-prepared set of questions derived from the literature review, that were adapted depending on the participant's role in the industry. The interview protocol (Appendix 1) includes open questions with regards to barriers to modern slavery risk management in prevention, detection and remedy and response phases.

We adopted a purposive sampling approach, identify participants who had experience of managing modern slavery in their jobs. The sample consisted of 22 expert stakeholders in the area of modern slavery outlined in Table 3. Participants were managers from different sectors, NGO researchers, government representatives and consultants. The participant criterion included familiarity with the issues of modern slavery, and experience in their current role. Despite the variation in experience of the participants (ranging from 1 year to 32 years), they all had a focus on modern slavery in their roles. We tried to include voices from countries at

the point of production, as well as countries at the point of consumption, to ensure we represented the views of participants working in NGOs in direct contact with victims lower down the supply chain.

We determined that a stakeholder-oriented approach involving experts who are knowledgeable about modern slavery was an effective approach to sampling (Crane et al. 2022), given the obstacles in doing research on modern slavery, and the difficulties of collecting data (Meehan & Pinnington, 2021) from reluctant sources, such as the perpetrators of modern slavery. Key participants were contacted through email with a summary of the research project. All interviews were voluntary, and all participants were aware that they could withdraw participation at any time. Following their written consent, participants selected an appropriate date and time for the interview to fit around their schedule. The interviews lasted between 22-58 minutes, and many of the interviews were conducted through Zoom due to Covid-19 restrictions, although some were in person.

Table 3. Summary of Participants

Code	Role	Organisation	Sector	Country	Years of experience	Interview length (minutes)
1	Ethical trade partner	Company	Garment	Europe, Mauritius & Madagascar	5	41
2	Co-founder	NGO	Related to modern slavery	Bangladesh	13	50
3	Communications officer	NGO	Garment	Turkey	1	45
4	Researcher	NGO	Garment	UK	2.5	40
5	Policy director	NGO	Garment	UK- Global	4	54
6	Director	Consultancy	Related to modern slavery	UK	1.5	57
7	Program officer	NGO	Related to modern slavery	Global NGO	3	55
8	Human rights officer	Government	Related to modern slavery	UK	1	52
9	Human rights officer	NGO	Related to modern slavery	India	6	49
10	Human rights officer	NGO	Related to modern slavery	India	32	59
11	Human rights officer	NGO	Related to modern slavery	India	8	41

12	VP of privacy ethics and compliance	Company	Service sector	Global	10	53
13	Consultant - human rights / sustainable innovation.	Consultancy	Related to modern slavery	US	5	26
14	Director - Centre of competence / responsibility	Company	Service sector	US	3	22
15	Head of compliance	Company	Service sector	US	13	48
16	Head of corporate services procurement	Company	Service sector	US	9	40
17	Head of responsible business	Company	Service sector	US	10	55
18	Director of regional procurement	Company	Service sector	Canada	7	49
19	Head of procurement	Company	Service sector	UK	5	22
20	VP of procurement excellence and corporate service	Company	Service sector	UK	20	35
21	Associate director	Consultancy	Related to modern slavery	US	6	27
22	Lawyer	Law Firm	Related to modern slavery	US	25	58

During the interview, participants were prompted to identify barriers to modern slavery. Interviews were voice recorded with previous consent from the participants to do so. Following the interviews, the recordings and notes taken during the meeting were transcribed verbatim to avoid information-selection bias and recordings were destroyed. Follow up emails were sent to participants when clarification was required.

3.1. Analysis

We followed an abductive approach to analyse the data and drew on a priori deductive themes that were identified from the literature (Table 2) whilst being sensitive to the research context and allowing inductive themes to emerge from the empirical data. This abductive theorizing approach allows iterative reflection between prior literature and data (Gehman et al., 2018; Ketokivi & Choi, 2014). The abductive steps are presented in Figure 2.

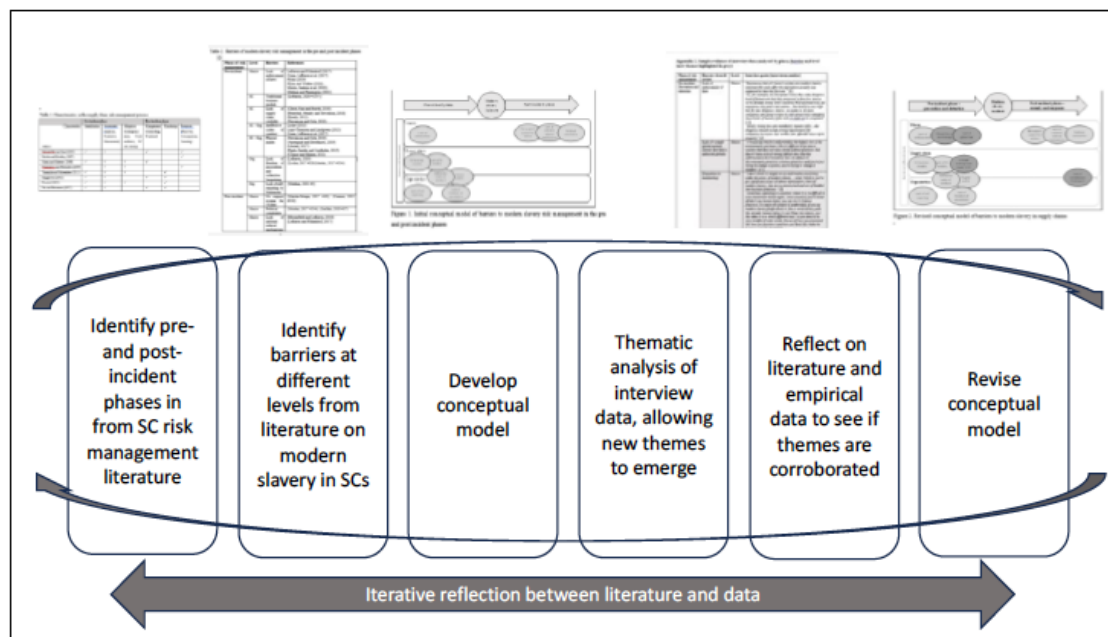


Figure 2: Abductive steps to develop conceptual model of barriers to modern slavery risk management in supply chains

The analysis involved several iterative stages, with the two authors leading different stages to prevent potential biases in the analysis process. The second author conducted the deductive thematic analysis of the literature to develop an initial a priori coding structure. This coding structure was checked by the first author, and discussed until the coding structure was agreed. Our initial a priori coding structure categorized barriers into pre- and post-incident phases, and identified barriers at macro, supply chain and organisational levels (Table 2).

The first author then led the coding of the interview data, termed ‘Coder 1 led coding’ (Cole, 2023). This started with the analysis of a sample of interview transcripts, that the second author also independently coded, to validate the first author’s interpretation of the data set (Cole, 2023). The research team then reviewed the coding structure and how it was applied to the interview data, and sought to resolve any discrepancies.

The first author then proceeded to lead the analysis of the interview data using NVivo 10, confirming existing themes and exploring new barriers that emerged inductively from the empirical data. For example, the sub-theme of “Lack of enforcement of laws” was identified from the literature and confirmed, while new sub-theme of “disparities in terminologies” emerged from the interview data as a barrier in the pre-incidence phase. Subsequent iterations

of the coding structure and example quotes were validated by the second author, until a saturation of themes was reached and no new codes emerged (Bowen, 2008). The literature was returned to throughout the analysis, and all themes were discussed and agreed by both authors. Once the analysis was complete, a summary of the findings was sent to participants for comment, and presented at a workshop on modern slavery in supply chains, and feedback sought.

3.4 Trustworthiness criteria

It has been suggested that trustworthiness in qualitative research and naturalistic inquiry involves meeting four criteria (Guba & Lincoln, 1989), which have also been discussed in a logistics and supply chain context (Halldórsson & Aastrup, 2003). The following table shows how this study sought to meet trustworthiness criteria.

Table 4: How this study meets trustworthiness criteria

Trustworthiness criteria	Explanation	How criteria were met in this study
Credibility	Matching the respondent's constructions and researchers' representation	All interviewees had a focus on modern slavery in their job roles. Interviews were transcribed and points of clarification were checked with respondents before analysis. Interviews had open questions to preserve flexibility to adjust interview questions based on responses (Gioia, Corley, & Hamilton, 2013). To solicit feedback, interviewees were sent a summary of the findings, and the findings were presented at a modern slavery in supply chains workshop.
Transferability	Moving from generalisation to contextualisation	The interviews and literature analysis entailed a detailed exploration of the specific context of modern slavery in supply chains
Dependability	Making clear the logic of process and method decisions	The rationale for sampling expert stakeholders is given. The abductive steps in developing and refining themes represented in the conceptual model are shown in Figure 2, providing an 'audit trail' (Pratt, 2009). The iterative steps in the analysis are shown to cross-check and prevent potential bias, led by the first and second authors
Confirmability	Findings represent the results of the inquiry	The logical flow from analysis of literature and interview data, to interpretation and

	and not the researcher's biases	conclusions is presented. Tables can show the connection between themes and sources and improve trustworthiness (Cloutier & Ravasi, 2021; Pratt, 2009). Tables 1 and 2 illustrate the development of themes from the literature analysis, and Appendix 1 shows the thematic analysis of interview data.
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4. Findings & discussion

This section captures the barriers to managing modern slavery risk identified in the interviews. Appendix 2 provides a table of sample evidence from the interview data analysed by phase, barrier and level. The barriers identified in the literature were all confirmed by the interview data. Several additional barriers emerged from the data, highlighted in grey in Appendix 1, and in Figure 2. Relevant literature is reflected on in the sections below.

4.1 Barriers at the pre-incident phase

Barriers at the macro level (two new themes)

At the macro level, an emergent finding from the interview data suggests that **disparities in terminology** may be a significant barrier to preventing the risk of modern slavery. As interviewee 6 states: *“I don't think it's helpful to try and bracket everything under the terms of modern slavery... what I think is you've got significant issues of labour exploitation, sort of modern slavery, that are so entrenched and sort of bedded into business practices”* [Interviewee 6]. LeBaron (2020) suggests the term modern slavery is often associated with human trafficking at the hands of criminal organisations and may overlook severe labour exploitation caused by modern business models. Without clear boundaries and understanding of the terminology, industries cannot develop the correct solutions to tackle the root causes of modern slavery (Crane et al., 2022; LeBaron, 2020).

A further emergent barrier at the macro level is the **lack of a single global modern slavery law** that is enforced globally: *“it's difficult to go into a country that does not have strong Labour practices that doesn't have a lot of strong Labour laws that has unfortunately discriminatory laws by default or discriminatory practices common practices and you're just trying to change a system”* [Interviewee 17]. To date legal efforts to regulate human rights and modern slavery issues across the global supply chains have been limited (Nolan & Bott, 2018). In the absence a global modern slavery law, focal firms seem to focus on their closer suppliers to tick the box of home country regulation, and neglect the suppliers in their lower tiers in host

countries, where usually there is little or no regulation of modern slavery in supply chains. Our empirical data confirmed the theme of lack of enforcement in line with previous literature. One interviewee stated: *“Businesses that still haven't written one modern slavery statement for years after the legislation actually was supposed to have the first one.”* [Interviewee 6]. Recent literature on this topic supports this view as legislation does not include binding standards or require evidence of action, and relies on collaborative action from firms and their supply chains to make any significant changes (Crane et al., 2018; Meehan & Pinnington, 2021). Subsequently, due to limited enforcement of regulation and lack of accountability, businesses and manufacturers do not have an incentive to prevent modern slavery in their supply chains.

Barriers at the SC / Organisational level (one new theme)

A new emergent theme at the SC level in the pre-incident phase was **limited leverage and power of buyers and suppliers**. As interviewee 21 states: *“...because they are very far removed from their direct suppliers, they have limited like influence and ability to leverage to address risks...”* [Interviewee 21]. A focal firm has control over the size, design, quantity and quality of the product, and therefore has potential leverage to influence the modern slavery prevention and detection practices in their lower tier suppliers (Nolan & Bott, 2018). Although the role of first tier suppliers in disseminating the focal firm's standards in terms of sustainability to the lower tiers has been acknowledged (Cole & Shirgholami, 2022), what happens between different tiers is that the buyer may lack the power to enforce standards and requirements related to modern slavery. In addition, lower tier suppliers might lack flexibility and the ability to contribute to these expectations.

A number of a priori themes from the literature were confirmed through the analysis of interview data. At the SC level, traditional business models and SC visibility are problems: *“A key barrier is visibility, you know, being able to know their supply chains, and know them well enough and what's happening at each stage is one thing.”* [Interviewee 7]. The complexity of supply chains has increased with global outsourcing predominately to highly unregulated regions such as South Asia, obscuring the transparency of operations in the lower tiers of supply chains (Camargo, Pereira, & Scarpin, 2020).

At the supply chain / organisational level, the themes of ‘ineffective codes of conduct’ and ‘flawed audits’ were reaffirmed by the interview data. In terms of codes of conduct, *“Companies have developed all these sorts of lovely codes of conduct... claims about living wage ... but in reality, they're pushing all the burden onto suppliers ... So, you get all these promises from brands, but no support and continued low pricing.”* [Interviewee 5]. Flawed

auditing has been a heavily criticised in the detection of modern slavery risks, however, auditing companies remain private non-state actors which profit from the service provided. *“It kind of works against the detection of risk... it's sort of in the interests of the social auditing firm to deliver more favourable results rather than reporting on the actual risks to workers.”* [Interviewee 4]. The findings coincide with recent literature which aims to bring more attention to the unregulated auditing sector (Fransen & LeBaron, 2019). Codes of conducts may serve as a tool to transfer risk onto the supplier rather than seeking to more directly prevent modern slavery, and social auditing may serve as a tool for companies to imitate detection with a ‘tick-box’ approach.

At the organisational level, several barriers were affirmed. With regards to lack of freedom of association, as one of our interviewees stated: *“Some of the biggest producing companies are ranked among the lowest for workers’ rights to organise”* [Interviewee 4]. Companies which do not ensure labour rights their supply chains are enabling an environment in which workers are unprotected and exposed to risk of modern slavery. Lack of self-reporting was also elucidated. As one of our interviewees stated: *“Where they find abuse... they don't want to report on it they don't think it's a good thing to report on it.”* [Interviewee 4]. Companies may be hesitant to report certain findings which may affect their public image (Sayed, Hendry, & Zorzini Bell, 2021). Nevertheless, insufficient company reporting means the effectiveness of detection cannot be measured.

4.2 Barriers at the post-incident phase

Barriers at the macro level

All the post -incident phase themes identified deductively from the literature were subsequently corroborated by the interview analysis. The findings suggest that there is a significant lack of response and remediation following the identification of a modern slavery incident. *“There’s just a lack of ... resource, maybe in our government or in general, that actually helps these workers rebuild their lives.”* [Interviewee 1]. There is a lack of support mechanisms, and political constraints in countries such as the UK have been highlighted as a barrier to effective response and remedy. *“It becomes a very political act. And it's linked to essentially picking on those foreign workers and deporting them.”* [Interviewee 5]. The lack of effective referral mechanisms was also affirmed by the interview data. As one interviewee observed: *“They have lack of access to services... they don't know how to complain, when to complain, and then they are not familiar with the local languages in the destination country”* [Interviewee 2].

Barriers at the SC / Organisational level (one new theme)

We found a new barrier in the post-incident phase at the SC / Organisational level, concerning a **“lack of remediation framework”**. The interviewees seemed to have a lack of knowledge about possible remediation actions, or the process within their firms. As interviewee 21 states: *“...it's a real challenges at an industry level essentially creating awareness, for grievance mechanisms and then the remediation frameworks that kind of a company and it's really important because you can't just have a grievance mechanism without a process for the remediation of risks and it's a kind of a clear thing, though, that many companies need to continue to evolve and formulate a strategy for it.”*[Interviewee 21]. Gold et al. (2015) suggested remediation approaches include adopting a multi-stakeholder perspective, developing a community centred approach and capacity building via supplier development. Stevenson and Cole (2018) included remediation training, soft and hard remediation processes and collaborative approaches in their suggested framework. However, operations and supply chain management research and practice is at nascent stage when it comes to remediation (Stevenson, 2022) and especially is missing details of how those experiencing modern slavery should be included in the process. There is a need for victim centric remediation frameworks designed by companies and supply chains.

5. Conclusions

This study sought to answer the research question:

“What are the barriers to modern slavery risk management in global supply chains?”.

We divided the risk management of modern slavery in supply chains into the pre-incident and post-incident phases. A range of barriers were identified from the literature, and an initial conceptual model was developed. Following analysis of the interview data, we are able to confirm the themes from the literature, and identify new barriers from the empirical data, represented by darker shading.

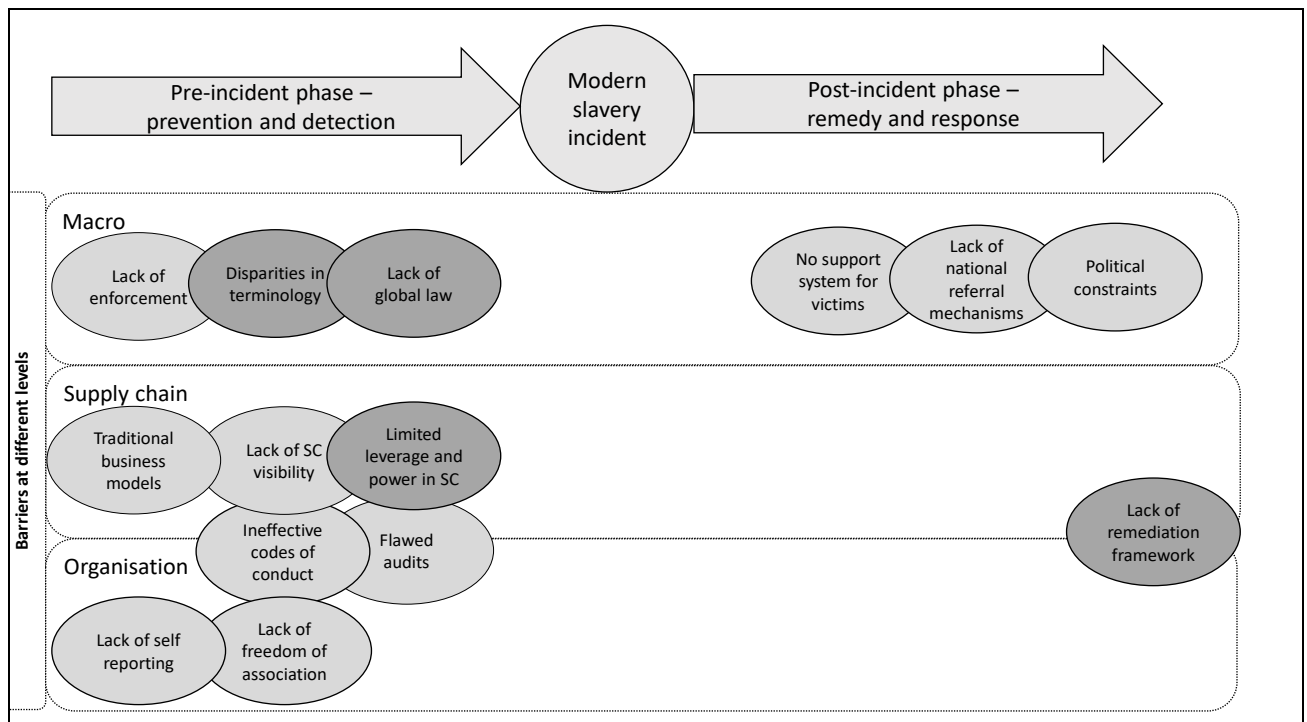


Figure 3. Revised conceptual model of barriers to modern slavery in supply chains

To the best of our knowledge, this is the first study to conduct an empirical investigate the barriers of modern slavery risk management from a supply chain perspective. It is apparent from our findings that previous research, as well as our own, has identified more barriers in the pre-incident phase and less in the post-incident phase. This could be because there are less barriers to modern slavery risk management after an incident, or that the phase has been the focus of less research, or that this phase presents more of a challenge to research. Whatever the reason, it seems that what happens after the detection of a modern slavery incident remains relatively opaque and little understood, in terms of organisational response and how the situation is remedied.

5.1 Limitations

This study faced several limitations. First, there were broader challenges related to researching a sensitive subject such as modern slavery, including the difficulty in obtaining primary data as companies are often reluctant to discuss the subject. When gathering data on sensitive topics like modern slavery, trust is crucial. To connect with companies and certain case workers, we sought the help of non-governmental organisations to facilitate contact. Additionally, undergoing an ethical review process and obtaining ethical approval prior to beginning data

collection, along with assuring anonymity, helps reassure stakeholders that the research will not have a negative impact on their organisation's reputation and will only be utilised to delve deeply into the complex issue of modern slavery.

In terms of the focus of the study, we limited our study to understanding barriers and we did not attempt to elucidate the enablers of modern slavery risk management, or explore the relationships between barriers, enablers, their antecedents and effects. With regards to the interviews, the Covid-19 pandemic prevented the face-to-face collection of interview data, requiring the use of zoom instead, so some nuances in responses may have been missed. Our interviewees provided few insights into the post-incident phase, and follow up questions at the end of the interview might have led to further illumination of this phase. In our approach to the analysis, we sought to discuss and resolve discrepancies in the coding structure and any new themes that emerged, and this could have been further validated by calculating inter-rater reliability at various stages in the analysis (Cole, 2023). These limitations will help inform our future research endeavours.

5.2 Implications for practice

The findings provide managers with a model of barriers that can be addressed at different levels, before and after a modern slavery incident occurs in their supply chain. Some of the barriers are more systemic and intractable, whereas others might show more potential for action by policy makers and practitioners. An example of a systemic issue concerns traditional business models. Modern slavery is often described as 'hiding in plain sight', and the way current supply chains tend to be structured (long, complex, poor visibility of lower tiers) can obscure modern slavery violations. The circumstances that allow modern slavery to thrive may not change until we find different approaches to traditional business models that focus on driving down costs in the lower tiers of global supply chains.

Some barriers show more potential for action by practitioners at different levels. For example, at the macro level, policy makers and legislators might consider developing consistent terminology, and global mandatory legislation that is effectively enforced. At the supply chain level, managers may seek to introduce blockchain technology to provide greater supply chain visibility and transparency, preventing the cloaking of modern slavery violations. Looking at third parties in supply chains, it would be beneficial to see auditors regulated, and for the inconsistencies between various codes of conduct to be ironed out to provide greater clarity for organisations. At the organizational level, there needs to be internal support for labour

standards and worker's rights to self-organise, and this support needs to extend to suppliers. If modern slavery violations are identified, supply chain managers need to encourage a culture of openness and develop a mechanism for self-reporting, rather than looking the other way for fear of reputational damage.

5.3 Implications for research

There are several directions that future research could take, and here we focus on the new barriers we identified in our empirical data (coloured in darker grey in Figure 2). In the pre-incident phase at the macro level, regarding a 'lack of global law', future studies could scrutinize how effective modern slavery laws are, and institutional theory (DiMaggio & Powell, 1983) could be adopted to explore the coercive pressures on organisations and how they respond to modern slavery laws. 'Disparities in terminology' could be investigated by capturing and consolidating the views of multiple stakeholders (Benstead et al., 2021). At the supply chain level, 'limited leverage and power in the supply chain', could be investigated by adopting resource dependency theory (Pfeffer & Salancik, 2015) to explore the power imbalances between buyers and suppliers, for example as they seek to implement codes of conduct in supply chains. In the post-incident phase, a new theme that emerged was 'lack of remediation frameworks', and future research could explore this gap in the literature. Remediation frameworks should not just focus on buyers and suppliers, instead they need to be centered on the victims of modern slavery to ensure their voices are heard. Finally, we adapted the pre- and post- incident phases which are common across supply chain risk management research (table 1). More research at the intersection of the fields of supply chain risk management and modern slavery in supply chains would be beneficial.

This paper contributes to current research through developing a conceptual model of the barriers to modern slavery risk management. Additionally, it provides a new influx of primary data which is extremely difficult to obtain in this topic of research. The range of themes developed from the analysis demonstrates how complex the issue of modern slavery is, how many barriers managers face, and highlights the need for further research.

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Appendix 1: Interview protocol

Example Interview Questions

1. Do you have any questions before we begin?
2. Let me start by asking a few questions about your background, to help frame my questions?
3. What are the biggest barriers in prevention of modern slavery risk?
4. What are the biggest barriers in detection of modern slavery risk?
5. What are the biggest barriers in remedy and response to modern slavery risk?

**Appendix 2. Sample evidence of interview data analysed by phase, barrier and level
(new themes highlighted in grey)**

Phase of risk management	Barriers from lit review	Level	Interview quotes [interviewee number]
Pre-incident - Prevention and detection	Lack of enforcement of laws	Macro	<i>"Businesses that still haven't written one modern slavery statement for years after the legislation actually was supposed to have the first one."</i> [6]. <i>"So, for example, the European Union Has a due diligence kind of framework that they proposed a directive, and so we're already seeing other countries kind of proactively put regulation into place that matters. The kind of a very high bar for due diligence. And so, we expect a lot more companies are going to have to start proactively managing these kinds of human rights risks in order to be compliant"</i> [13] <i>"Really strong laws are mandatory human rights...due diligence should include strong requirements for companies to ensure that workers are afforded those rights properly"</i> [4]
	Lack of a single global modern slavery law that is enforced globally	Macro	<i>"I would say the first and probably the biggest one is the environment, you know, like it's difficult to go into a country that does not have strong Labour practices that doesn't have a lot of strong Labour laws that has unfortunately discriminatory laws by default or discriminatory practices common practices and you're just trying to change a system. you're trying to change a mindset"</i> [17] <i>"Although we have a lot of ability to kind of drive change, I think also working like in country laws [Like Qatar or Saudi] like to be extremely challenging as well"</i> [12]
	Disparities in terminology	Macro	<i>"I don't think it's helpful to try and bracket everything under the terms of modern slavery... what I think is you've got significant issues of labour exploitation, sort of modern slavery, that are so entrenched and sort of bedded into business practices."</i> [6] <i>"sometimes operating in countries where it is so difficult to even mentioned human rights, some countries you're better off don't say human rights, you say oh it's Labour practices, it's easier for people to understand, if you say modern slavery forget about it, like A word slavery yeah like already human rights it's not Okay, but slavery, just like takes it to a whole different level, so you have to be very mindful of what words, the use of how you presented like how you position it and how you basically make the business case for this"</i> [17]
	Traditional business models	SC	<i>"I think the biggest barrier is our supply chains can be very long and therefore it's not realistic that we're necessarily going to always know every single party in that supply chain. So, we have to focus on the tier one suppliers and making sure that we've vetted that enough the way comfortable, they are then managing their own supply chain"</i> [19] <i>"Downward pressure placed by large companies on suppliers to meet short lead times...to kind of cut corners in terms of labour protection for workers"</i> [4] <i>"Consumers are the ones who have the authority to change things, and also governments but governments are usually</i>

			<i>nonresponsive.” [3]</i> <i>“Business model is very much one where the profits are concentrated at the top, for the retailer for the brand. So, their profit margins are generally much higher than you know, as you go down the value chain.” [5]</i>
	Lack of supply chain visibility	SC	<i>“We try to do is the influence and the recommendation and the training and the availability and then where issues do come up so frankly visibility is the biggest issue right it's not that many issues bubble up” [15]</i> <i>“I think we don't have sort of really going, you know, probably to that tier three tier four because there's so many components that come from everywhere, like, especially when you're building furniture. factory assembly net is one thing and the person producing the veneers but then you have electronic components, you have all these other components that are coming from everywhere and we don't have a lot of visibility there” [18]</i>
	Limited leverage and power of buyers and suppliers	SC	<i>“I think it's leverage. because they are very far removed from their direct suppliers, they have limited like influence and ability to leverage to address risks and you know, I think that that model at the moment relies on kind of these intermediary suppliers and brands and companies that they source from having good responsible business practices in place and self-reporting and monitoring so, for example, Unilever, is a kind of supplier of that we know obviously they have some of the most advanced responsible sourcing policies in place and so that's obviously reassuring but you know I guess, where the risk sets that it's hard for them to influence and leverage and use their leverage to address risk” [21]</i>
	Insufficient codes of conduct	SC / Org	<i>“Companies have developed all these sorts of lovely codes of conduct... claims about living wage ... but in reality, they're pushing all the burden onto suppliers ... So, you get all these promises from brands, but no support and continued low pricing.” [5]</i>
	Flawed audits	SC / Org	<i>“Social auditing firms enjoy pretty much total corporate impunity for making a decision that the workplace is safe to work in... they have this ability to retain the records of their initial inspection so and prevent workers from accessing those records.” [4]</i> <i>“It kind of works against the detection of risk... it's sort of in the interests of the social auditing firm to deliver more favourable results rather than reporting on the actual risks to workers.” [4]</i>
	Lack of freedom of association	Org	<i>“Brands, you know, in their home country will resist having trade unions, or put on paper that they want trade unions, but do very little about supporting trade unions” [5]</i> <i>“Some of the biggest producing companies are ranked among amongst the lowest for workers' rights to organise.” [4]</i> <i>“I think the Union side can be tricky. But you know, particularly with unions that are maybe less constructive and you know that's always the challenge isn't it?” [21]</i>
	Lack of self-reporting by companies	Org	<i>“Where they find abuse... they don't want to report on it they don't think it's a good thing to report on it.” [4]</i> <i>“No incentive for like a company to identify anything about it ... See no Evil, Hear No Evil.” [Interviewee 7]</i>
Post-incident - Response and	No support system for victims	Macro	<i>“There's just a lack of ... resource, maybe in our government or in general, that actually helps these workers</i>

remedy			<i>rebuild their lives.” [1]</i>
	Political constraints	Macro	<i>“It becomes a very political act. And it's linked to essentially picking on those foreign workers and deporting them.” [5]</i>
	Lack of national referral mechanisms	Macro	<i>“Especially in the UK, like the national referral mechanism, isn't necessarily working, because it's so hard for victims to actually, well, first of all come forward because they're worried about what will happen to them.” [Interviewee 1]</i> <i>“They have lack of access to services... they don't know how to complain, when to complain, and then they are not familiar with the local languages in the destination country.” [2]</i>
	Lack of remediation framework	SC/Org	<i>“...it's a real challenge at an industry level essentially creating awareness, for grievance mechanisms and then the remediation frameworks that kind of a company and it's really important because you can't just have a grievance mechanism without a process for the remediation of risks and it's a kind of a clear thing, though, that many companies need to continue to evolve and formulate a strategy for it.” [21]</i>