

Human Rights Report & Modern Slavery Statement 2022/23



WORKING IN PARTNERSHIP FOR A HAPPIER WORLD

JOHN LEWIS

WAITROSE

Our business

Reflections from our Chairman

The John Lewis Partnership was founded with the welfare of people at its heart; a principle that remains core to everything we do today.

Our 2023 Human Rights Report demonstrates the efforts the Partnership goes to in protecting the rights of the many thousands of people who work across a multitude of industries to supply our Waitrose and John Lewis brands. It also shines a light on the challenges faced by so many people in their day-to-day lives as they strive to make a living.

We want our customers to be confident that the products they buy from us are made in a way that aligns to their values. Our customers trust us to do the right thing and live by our Purpose, contributing to a happier world by ensuring that everyone involved in manufacturing our products is able to fully exercise their individual and collective rights.

Partners from across our business who are involved in the important and urgent work outlined in this report should be proud of the very real improvements their efforts are having on the ground. Last year, our Ethical Audit Programme saw a 65% increase in full audits and follow up audits conducted across our food, grocery, fashion and home/tech supply chains.

We also carried out spot checks across a number of international supply chains to ensure our processes were working.

To gain a deeper understanding of how our supply chains impact the people who work within them and the communities that surround them, we also undertook deep dive Human Rights Impact Assessments, hearing first-hand from people in our supply chains. These powerful tools offer up a deep understanding of the challenges presented by particular industries and sectors, not only in distant factories but in businesses much closer to home. Our detailed study of the UK outdoor-bred lamb and pork sectors demonstrates this.

There is much to read and absorb in these pages, but what do we want this report to achieve? It is not only an important record of our work in often difficult circumstances by individuals and teams who want to make life better for others. It is also a clear reminder of the urgency of the progress that we still want to make. I would like to thank all our Partners, customers, NGOs, businesses and workers from across the globe who have contributed to our efforts.

Sharon White
Chairman



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The Partnership

The John Lewis Partnership is the UK's largest employee-owned business and parent company of our two cherished retail brands, John Lewis and Waitrose, which are owned in trust for over 78,000 employees (who are Partners in our business).

You can find out more about our business in our 2023 Annual Report and Accounts.



Our Purpose

Working in Partnership for a happier world

Our Partnership is an ongoing experiment to find happier, more trusted ways of doing business, for the benefit of us all.

We work together to create a successful business and a fairer, more sustainable future for Partners, customers, suppliers and communities.

Our Partnership is owned entirely in trust by Partners which means we are more than employees; we share knowledge, power and profit.

Our Purpose inspires our principles, drives our decisions and acts as our guide.

Happier people

Our happier business starts with happier Partners, enjoying worthwhile and satisfying work in a supportive environment we all help to create.

We treat people with fairness, courtesy and respect, and we work with others who do the same.

We create an inclusive environment and celebrate diversity with our Partners, customers and the communities we serve. We're at our best when we all feel welcomed and free to be ourselves.

We take pride in making our customers happy. We put everything we have into everything we do, earning the loyalty and trust that we need to be successful.

Happier business

We build happier businesses that are honest, fair and free to think and act for the long term. We aim to make sufficient profit to retain our financial independence, invest in our Partners and pursue our Purpose.

Our Partnership is built on democratic principles. We share the responsibilities and rewards of ownership: knowledge, power and profit.

Partner opinion is crucial in driving the actions of our governing authorities: the Partnership Council, the Partnership Board and the Chairman.

Happier world

We champion the role our Partnership can play in advancing the happiness of the communities we work with and the wellbeing of society.

We build trusted business relationships, acting with integrity and doing what's right.

We take responsibility for our impact on the planet. We work tirelessly to protect and restore nature, creating a more sustainable future for generations to come.

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Strong governance over how we manage and mitigate the risk of human rights abuses – including modern slavery – in supply chains providing goods and services to our Partnership is critical. This helps ensure we are meeting and exceeding our responsibilities as a business, and the requirements of the Modern Slavery Act 2015.

Governance of human rights in the Partnership forms part of our wider ethics and sustainability governance and is overseen by a Board-level Ethics & Sustainability Committee (ESC). The Committee comprises the Chairman, the Deputy Chairman (who is the Chair of the Committee and a Non-Executive Director), one Elected Director, two External Independent Members and one Executive Director, the Executive Director, Finance. The Executive Directors who are responsible for John Lewis, Waitrose and Strategy & Commercial Development (or their delegate), and the Director of Ethics and Sustainability, also attend meetings. John Morrison, Chief Executive at the Institute for Human Rights and Business and Sarah Mukherjee, Chief Executive at the Institute of Environmental Management and Assessment, were appointed to the Committee as External Independent Members in December 2022. In the area of human rights in particular, John brings a wealth of experience to the Partnership. The terms of reference for this Committee state that its purpose is to “assist the Board in fulfilling its responsibilities for setting the Ethics & Sustainability (E&S) strategy in accordance with our Partnership’s Purpose and Values and ensuring that this strategy is embedded into [our] operations.”

Nina Bhatia, Executive Director of Strategy & Commercial Development, has accountability for human rights and responsible sourcing performance across our Partnership.

An ethical compliance update is provided to the ESC each quarter, with the Committee holding to account those responsible for delivery in operational teams.

Ethical sourcing performance is also monitored via our risk management framework, for further information on this framework, please refer to our Annual Report and Accounts 2023. Alongside existing business activity, the Partnership’s Human Rights team identifies and requests funding for, additional project work to support progress against our E&S targets.

Reflections from our Director of Ethics & Sustainability

The past year has been challenging for many businesses as they face rising costs, as well as for customers squeezed by higher domestic bills. Given these challenges, it would be easy to retrench and focus efforts away from assuring the rights of the often unseen individuals whose hard work, in many different countries, allows us to trade, day in and day out. But that’s not how the John Lewis Partnership operates.

We firmly believe that working for the Partnership, even indirectly, should be a positive experience. If you work for a business producing something that we sell or use, you should be paid fairly, be safe at work and be able to enjoy your human rights unhindered. As a responsible retailer we must ensure that this is the reality for workers and communities touched by our business, wherever they may be.

In November last year I had the unique opportunity to visit some of the Waitrose Foundation suppliers and projects in Senegal and The Gambia. I was struck by the impact that some of the projects have on the daily lives of people who live in the communities around the farms from which we source, for example the provision of school facilities and maternity services.

More recently we launched our commitment to invest £1m in climate resilience programmes through Waitrose Foundation farms. This investment follows detailed analysis we carried out in key supply chains and it will focus on ensuring beneficiaries can see improvements to their livelihoods. We have also made improvements to our own systems to streamline our data gathering and analysis, notably by moving John Lewis data to the Sedex platform.



We are very mindful of the fact that risk mitigation is key to long-term improvement to human rights, and we work hard to identify those supply chains where people may be facing challenges to even their basic rights. The Modern Slavery Intelligence Network is a key tool and we are proud to be a member of that group. We have used a section of this report to clearly outline areas of current concern and will continue to do so in subsequent reports.

I’d like to thank Partners across our business, and all those who have worked with us to make life better for so many workers. Making deep seated change for the better is never easy; it takes persistence, bravery and compassion. I’m proud to see those qualities demonstrated throughout this report.

Marija Rompani
Director of Ethics & Sustainability

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The ambition of our Human Rights Programme is to enable everyone in our supply chain to realise their fundamental human rights. We have an overarching commitment to respect the rights of the people who pick, make, pack and transport products for us and provide services to us, as well as those living in surrounding communities where we operate and from which we source. Our Responsible Sourcing Code of Practice (RCSOP) sets out our commitment to workers' rights and our expectations of our suppliers regarding working conditions.

Human Rights Policy

In 2022, the Partnership published its Human Rights Policy, recognising our potential human rights impacts are broader than those laid out in the Responsible Sourcing Code of Practice (RSCOP). The policy clearly sets out our commitment to upholding the human rights of all who come into contact with our business, whether that's within our own operations, our supply chains, or organisations we work with. The policy also reaffirms our commitment to requirements such as equality and inclusive grievance processes, irrespective of characteristics. This includes but is not limited to: gender; sexual orientation; race; ethnicity; migration; refugee status; disability. It also prohibits recruitment fees and includes our commitment to upholding land rights for indigenous communities, and access to water. We aim to collaborate with suppliers to address systemic issues that exist beyond their own production sites and farms, in line with our Human Rights Policy. Examples of these collective efforts are detailed on pages 12-18.

In 2022, we also developed a Partnership Human Rights Framework to ensure Partners responsible for making decisions across our business consider the associated human rights risks and issues. The framework illustrates potential areas of impact that Partners should consider and advises on how to evaluate options and monitor decisions effectively with workers' welfare in mind.

Policy Framework

Human Rights Policy	<p>Purpose To set out our commitment to respecting all human rights.</p> <p>Scope Our own operations, all supply chains, surrounding communities and charity partners from whom the Partnership procures services or donates to.</p>
Responsible Sourcing Code of Practice	<p>Purpose To ensure decent working conditions in line with basic human rights.</p> <p>Scope All supply chains to the Partnership.</p>
Ethical Compliance Policy	<p>Purpose To demonstrate compliance to RSCOP.</p> <p>Scope Tier 1 factories supplying John Lewis and Waitrose own brand products.</p>

Responsible Sourcing Code of Practice

The Partnership's Responsible Sourcing Code of Practice is based on the Ethical Trading Initiative (ETI) Base Code, an internationally recognised standard for best practice implementation of labour rights in the workplace, drawing on International Labour Organization (ILO) conventions.

Ethical Compliance Policy

Our Ethical Compliance Policy sets out how we monitor compliance to RSCOP. All goods for resale suppliers in our own-brand supply chains must demonstrate they meet the RSCOP by completing self-assessment questionnaires and undergoing subsequent inspections in line with our Ethical Compliance Policy.

The due diligence process surrounding this policy enables us to identify gaps in understanding or application of the RSCOP, and to determine where suppliers will benefit from upskilling and capability building. We then support with remediation and specialist training and programmes that increase knowledge and drive sustainable improvements in these areas.

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Our Human Rights Programme sits within the 'People in Supply Chains' area within our [Ethics & Sustainability Strategy](#). It is based on our risk assessment and due diligence programme to ensure that suppliers adhere to the RSCOP at an absolute minimum, whilst our capacity building programmes aim to improve the understanding and application of our policies. We aim to have a positive impact in our supply chains through programmes which support workers and smallholders to improve their livelihoods.

The ambition of our Human Rights Programme is to enable everyone in our supply chain to realise their fundamental human rights. We believe that championing worker voice and building strong supply chain relationships creates lasting value for those with whom we work, the John Lewis Partnership and our delivery of our Purpose.



We recognise suppliers have different levels of understanding and capability, so our human rights activities aim to support them at every stage. Further information on training opportunities we provide to support suppliers can be found on page 17.

We facilitate a number of different groups and programmes that engage suppliers to go further than basic compliance, including the Better Jobs programme and the Waitrose Foundation. We work closely with these suppliers to understand their issues at a local level and to support them in improving workers' livelihoods and happiness at work.

Basic working conditions: Identifying risks and monitoring conditions

Our human rights work is built upon our fundamental monitoring and risk assessment processes. At a minimum, we require that working conditions for those working within supply chains supplying our Partnership comply with the RSCOP. We prioritise our risk assessments based on the level of associated supply chain risk – including country of origin, industry and product type – and the level of influence and impact we are able to have on a particular supply chain.

Goods for resale in Waitrose and John Lewis

For more information about our basic goods for resale supply chain monitoring programmes you can read our [2021/22 Human Rights Report](#) and [Modern Slavery Statement](#), or visit our [website](#).

Changes to Sedex¹ requirements

In 2022, we amended the process for managing ethical compliance data for John Lewis own-brand suppliers and factories, transferring our management of audit data to the Sedex platform¹. We now require all sites supplying Waitrose and John Lewis to have Sedex membership and complete the Sedex self-assessment questionnaire (SAQ), enabling us to align our risk assessment outputs across our brands. This output now determines the audit frequency required for ongoing monitoring and is completed annually.

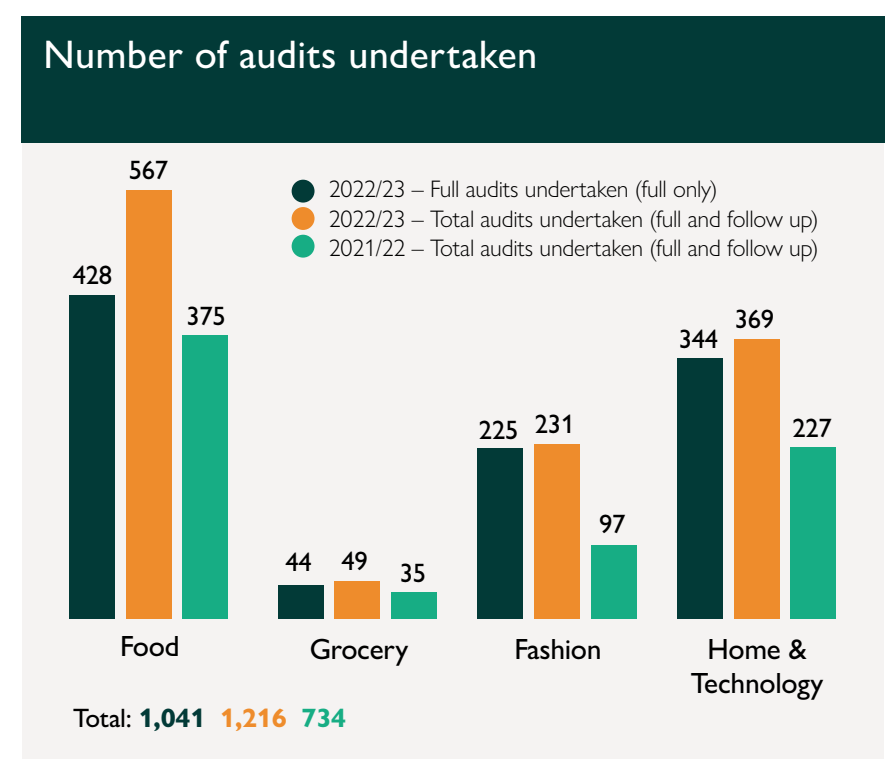
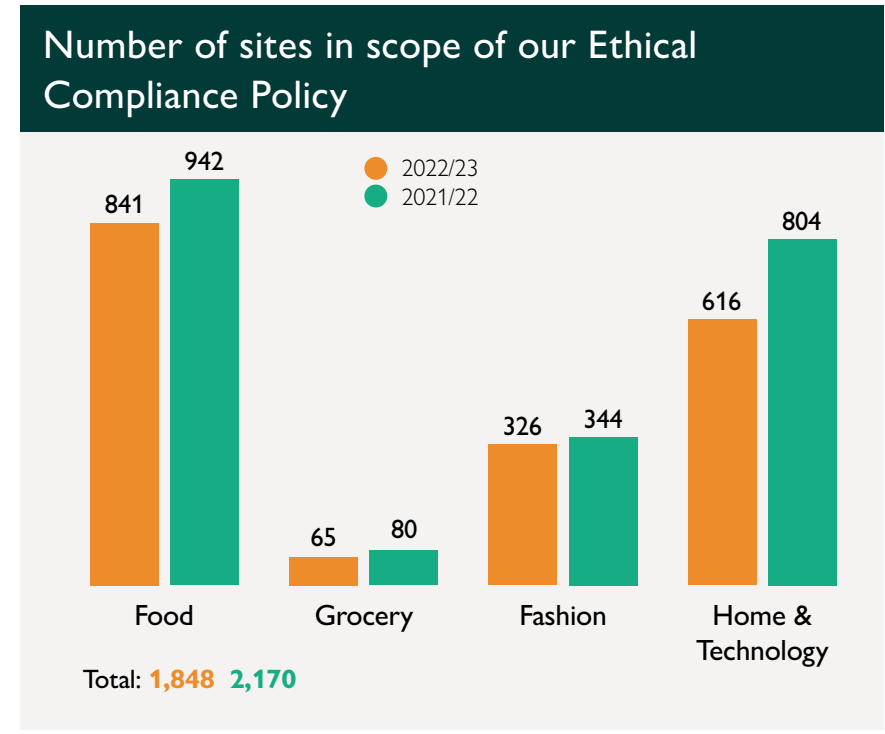
In 2022, Sedex announced new changes to improve the Sedex SAQ. This has resulted in a more streamlined self-assessment which gives us a clearer view of the recruitment process for migrant workers in our supply chains, as well as their accommodation arrangements. We can use this data to monitor impacts on workers as they're being recruited and help mitigate any potential risks before they arise. We were also involved in reviewing Sedex's classification of non-conformance (NCs) against the ETI Base Code requirements (which mirror those of RSCOP). This gives all Sedex users greater alignment and will support suppliers in streamlining corrective action processes for multiple customers.

1. Sedex is the industry wide platform the Partnership uses to manage data on sites within its supply chain. Sites are able to publish their SMETA (Sedex Members Ethical Trade Audit) via an auditor onto Sedex for the retailer to see.

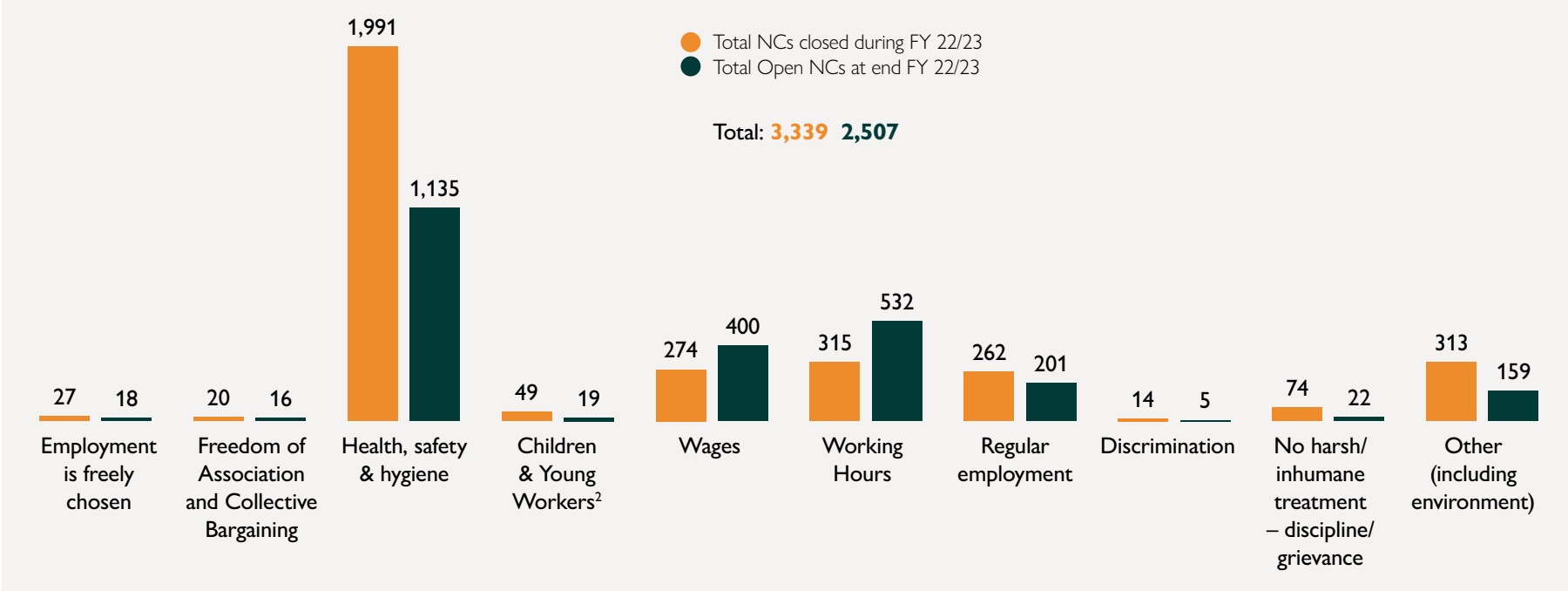
Year-on-year audits and follow ups

In 2022/23, 65% more full and follow up audits were conducted across our food, grocery, fashion and home & technology supply chains than in 2021/22. Full audits require auditors to look at all elements of RSCOP to verify their compliance rather than follow-up audits which focus solely on pre-identified areas for non-conformance closure. In this reporting year we carried out 1,216 full and follow up audits, compared to 734 in the previous reporting year. This year we have begun looking more closely at different types of audits which has allowed us to distinguish that of the 1,216 audits which took place in our food, grocery, fashion and home & technology supply chains this year, 1,041 were full audits.

Over the past year we have continued to focus on ensuring that we are continually reviewing our data accuracy and that we are maintaining the most up-to-date factory lists for both of our brands. We have also been consolidating our supply base where appropriate, and as a result we have seen a drop in the number of sites we are reporting as 'in scope of the Ethical Compliance Policy' at the end of 2022/23 from 2021/22.



Addressing non-conformances to RSCOP



2. The child labour and young worker clause of RSCOP includes non-conformances relating to missing or incomplete policies, missing age records from personnel files, working hours for 16-18 years olds.

We closed 1,396 more non-conformances this year than in the previous reporting period, representing an increase of 139%. Health and safety remains the most frequently-reported issue within our audit programme, and therefore is one of our most salient risks. Despite this, we have seen a 26% decrease in the number of Health and Safety NCs being opened in our supply chains from last year.

Spot checks

The Partnership commissioned a number of spot checks during 2022/23 to monitor the effectiveness of our compliance programme. These were carried out to SMETA³ standards or a tailored methodology where appropriate, and sites were chosen either through a random selection process to verify the effectiveness of our risk assessment process or to follow up on specific concerns. Overall, 15 took place within the last year: 7 for Waitrose and 8 for John Lewis suppliers. Broken down further, there were: 2 for Waitrose in the UK; 1 in France; 1 in Spain; 1 in the USA and 2 in Kenya. For JL: 2 in the UK; 2 in Spain; 1 in Malaysia; 1 in the Philippines; 2 in India.

3. SMETA (Sedex Members Ethical Trade Audit). This is an audit which encompasses various aspects of responsible business practice. SMETA audits use the ETI base code and can be conducted against two or four auditing pillars. The Partnership asks for at least a two pillar audit which covers Labour Standards and Health & Safety. Link to SMETA on Sedex.

CASE STUDY

Tier 2 site assessments and tackling child labour

In our Human Rights Report last year, we set out our ambition to conduct due diligence at Tier 2 sites within our main lighting supply chain, where key components in John Lewis own-brand products assembled by our key supplier are made. Working with our Hong Kong Sourcing Office (HKSO) and a key lighting supplier, we identified ten Tier 2 sites supplying glass, lampshades, lamp hose and electrical wiring componentry. All of these sites are located in Guangdong Province, China.

We began visits to these sites in Spring 2022 but temporarily paused visits until early 2023 due to identification of an underage worker at one of the sites and our shift in focus to remediation as a result. The child was working to earn money for a vocational course as they did not wish to continue with academic education. The factory had consented to this arrangement on condition the child only carried out non-hazardous tasks and that the parent would receive their wages in order to safeguard them.

As set out in our guidance on [Child Labour Remediation Best Practice](#), the Partnership worked with the supplier and the site to remedy the situation. Our priority was to ensure the safety of the child, so we engaged the support of The Centre for Child Rights and Business to assist us with investigating the situation and in supporting the individual and their family to an appropriate solution. To help ensure the child does not enter back into labour before the legal age, the Partnership established a remediation fund to support the family and continues to work via The Centre who were in direct contact with the underage worker and their family. The supplier is also reviewing their own internal auditing process to ensure they can identify such cases and resolve any issues found.

Key raw materials and certifications

We continue to work with certification bodies to offer assurance of worker welfare standards within our higher risk raw materials supply chains, including Fairtrade, Roundtable on Sustainable Palm Oil (RSPO) and The Sustainable Fibre Alliance. More information about these ongoing programmes can be found in our 2021/22 Human Rights Report and Modern Slavery Statement.

Cotton

The Partnership has committed to sourcing 100% of the cotton used in own-brand products from more sustainable or recycled sources by 2025. To do this, we continue to be an active member of Better Cotton. Our Senior Manager, Human Rights Programmes, now sits on the Standards Committee, which was responsible for providing oversight of the recent revision of the Principles and Standards Criteria and for recommending final approval of adoption to the Better Cotton Council. This revision ensures Better Cotton certification remains an effective tool to drive continuous improvement, such as positive sustainability impact at field-level and to address lessons learned from previous revisions. This latest version (Principles and Criteria (P&C) v.3.0) received formal approval from the Better Cotton Council on 7 February 2023. It will become effective for licensing starting in the 2024/25 season.

Cocoa

Historically, Waitrose has committed to sourcing Fairtrade cocoa for all own-label block chocolate. We are now extending this, with the Partnership committing to using 100% certified cocoa from either Fairtrade or Rainforest Alliance cooperatives in its own-brand products by 1 January 2025. Using 100% certified cocoa will take us closer to our goal of sourcing key raw materials from more sustainable sources, as both certification schemes have strong standards and assurance systems in place to protect and strengthen the rights of people within the cocoa supply chain.

Wild caught fish

The Responsible Fishing Vessel Standard (RFVS) is a voluntary programme certifying high standards of vessel management and safety systems, including crew safety, rights and wellbeing. Our aim is for all UK vessels supplying Waitrose to be RFVS certified.

The reality seems to be that suppliers are considering but not doing at this point, so we are currently looking at other options for ensuring worker welfare standards in wild caught fisheries. The reason for having this in here though is that we talk about RFVS last year and this exercise was designed to help us make progress. We have actually learnt a lot about the barriers to adoption and also that our existing target is not one we will meet in its current form, but this will give us the opportunity to develop a new programme and focus certification on selected vessels.

Human Rights Impact Assessments

Human Rights Impact Assessments (HRIA) go beyond the requirements of RSCOP and assess our supply chains against the requirements of our Human Rights Policy.

Kenya tea HRIA

In partnership with Marks & Spencer, we completed and published our Human Rights Impact Assessment of our Kenyan smallholder tea supply chain. As an important origin for both brands, this study ensured we were able to gain a deeper understanding of our shared supply chain in Kenya, hearing the views of smallholder farmers, hired labourers and factory workers in the industry. We have published the findings and an action plan that was developed in consultation with the Kenya Tea Development Agency (KTDA) and our supplier, Ringtons. In 2023 we will be working towards completion of the action plan and will be reporting on our progress.

Pork and lamb HRIA

On behalf of Pilgrims, the Co-op and Waitrose, Impactt, a worker-focused human rights and business management consultancy, carried out a HRIA of outdoor-bred pig and lamb farms which was completed in 2022. Focusing on pig and lamb rearing farms in the UK, as well as processing and abattoir sites, this HRIA has supported Waitrose and Co-op in gaining a clearer understanding of how their business decisions both support and impact farmers, workers and other stakeholders in the pig and lamb supply chains. It demonstrated how increasing the prices paid to farmers during the acute labour crisis following the pandemic ensured our farmers didn't face the same negative impacts the rest of the industry were facing as well as other good examples. The report also highlighted actions we can collaboratively take to mitigate, prevent and remediate more challenging impacts. We have since published the full report along with a detailed action plan.



Egyptian cotton HRIA

In 2022, we commissioned Partner Africa to conduct a HRIA within some of our Egyptian cotton supply chains. This assessment will cover supply chain impact throughout all stages of the production process, from planting, farming, ginning, spinning, weaving, production and manufacture in both Egypt and India. Cotton is one of our most commonly used own-brand raw materials, featuring in bed linen, filled bedding, furnishing accessories and fashion. This supply chain impact assessment will continue into 2023 and will help us to understand the overall human rights impact of our cotton footprint.

Ecuadorian shrimp HRIA

We also commissioned Ergon Associates to complete a HRIA within our prawn supply chains from Ecuador. They will look at the risk of exploitation in the supplier workforce and associated local rights-holders in the areas where our supplier operates. Their assessment will include the hatchery, food mill and production site. We plan to share the key findings externally once complete (in 2024).

Goods Not for Resale (GNFR)

Goods

In 2022/23, we refreshed a gap analysis of ethical risks within our GNFR goods supply chains, in particular to review existing risk-management processes and to identify areas to improve due diligence processes.

We already have a Partnership Procurement Standard that lays out our expectations for GNFR suppliers including compliance with RSCOP and the sustainable sourcing of raw materials – specifically cotton and timber. The Procurement Standard also lays out the responsibility of our own Partners to only source from compliant suppliers.

We also already require all GNFR suppliers to complete a self-assessment of compliance against a number of key areas, including human rights, modern slavery and health and safety, which is then risk assessed by specialists across the Partnership.

Through this gap analysis process and ongoing work with GNFR Procurement teams and suppliers, we aim to ensure we have even greater visibility of the supply chains, and have appropriate risk mitigations in place.

Services

We partnered with Slave-Free Alliance (SFA) to refresh our risk-assessment of GNFR services supply chains. This included our own operations: third-party led supply chain sites and other third-party led sites including waste recycling sites. SFA conducted a desk-based analysis of our GNFR service provision to produce an overall site risk assessment rating. It was based on several factors, including local workforce composition (temporary and agency versus permanent) and publicly available information concerning labour exploitation risk in the area.

Using this risk assessment, SFA were able to visit on our behalf all sites established as high risk for modern slavery and/or labour exploitation. There were 10 in total, ranging from distribution centres and delivery hubs to waste recycling sites. SFA have confirmed that no modern slavery was found during this programme of work. They have, however, provided both site-specific action plans and wider recommendations to the Partnership which will allow us to continually improve our policies and procedures. One such recommendation was to further tighten the document checks undertaken as part an induction process.

Salient human rights risks

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The Partnership's Human Rights team works to identify current and future human rights issues and remains informed through participation in industry forums and by engaging with external stakeholders such as NGOs, other brands and Government bodies. In addition, we regularly review the supplier data we have available to ensure we focus resources on the most salient human rights risks.

In 2022/23, we made some slight changes to our programme activity in line with this approach. This included focusing resources on projects related to issues identified through the HRIA on Kenyan tea published in 2022 and our independent review of migrant labour conditions in wild caught fish supply chains (as reported in last year's Human Rights Report and Modern Slavery Statement).

The following table shows our salient human rights by issue type and where they exist across the Partnership's supply chains:



Salient human rights risks		
Human rights risk	Supply chain	Programme to address risk
1. Employment is freely chosen	Wild fish – UK	Worker education films and advocacy work (see page 12)
	Agricultural – UK (Seasonal Workers)	Seasonal Workers Taskforce (see page 12)
	Warehousing – UK	Partnership with Slave Free Alliance (see page 10)
2. Freedom of Association	General Merchandise – China	Supporting effective worker & management dialogue (see page 16)
3. Health & safety	Tier 1 factories global	IHASCO training (see page 17)
4. Child labour	General Merchandise China (specifically below Tier 1)	See case study (page 9)
	Cocoa – Côte d'Ivoire	See Key raw materials & certifications (page 9)
5. Wages	Bananas – Dominican Republic	Living wage commitment (see page 13)
	Tea – Kenya	See actions from HRIA (page 10 and page 20)
	Tea – Assam, India	See wages section (page 13)
	Hand made rugs – India	See wages section (page 13)
6. Gender and discrimination	Tea – Kenya	See actions from HRIA (page 10 and page 20)
	General Merchandise – China	See looking forward section (page 20)

Programmes addressing salient risks

Our programme work focuses on addressing the salient human rights risks we have identified in our supply chains, as we believe this has the greatest opportunity for impact. This work includes improving the capability of our Partners, our suppliers and rights holders themselves, as well as working with other brands to collectively tackle common shared risks.

Employment is freely chosen

Worker education films for migrant crew (UK fisheries)

In last years Human Rights Report and Modern Slavery Statement we reported on our research into working conditions experienced by migrant fishers in the UK. Following the completion of research, a further independent report was published by the University of Nottingham looking at working conditions across the UK fishing industry. In response to this research and to deliver against the recommendations in our research, we engaged with a broad range of industry stakeholders to agree an action plan.

As part of this action plan, Waitrose has commissioned the production of a series of worker education films. These films will give workers a basic understanding of what to expect working within the UK fishing sector, including signposting resources and organisations that can support them.

The films have been developed following a rigorous process of stakeholder engagement, bringing together workers, industry and government bodies, NGOs, employers and suppliers to ensure the films accurately represent the industry and are appropriate for workers' needs.

Alongside the worker education films, the Partnership has also engaged in advocacy work to support better working conditions in UK fisheries. The Partnership provided a written response to the consultation about the Draft Fisheries Statement in March 2022, advocating a planned end to transit visas being used for migrant workers in the fisheries sector.

Seasonal workers in the UK fresh produce sector

The UK Seasonal Workers Scheme (SWS) was first launched in 2019 to address labour shortages in the agriculture sector. In 2022, 40,000 visas were made available for people to be recruited through licensed labour providers. However, since the launch there have been documented human rights abuses, predominantly relating to debt bondage and recruitment fees charged to migrant workers. This was exacerbated in 2022 with the expansion of the scheme to new countries in response to a reduction in Ukrainian workers travelling to the UK. This has led to further documented cases of exploitation across a number of farms in the UK.

The Partnership, along with a number of other UK food retailers, contributed funding and resources to a series of multi-stakeholder roundtables in the autumn of 2022 to share knowledge, critical thinking and to encourage collaboration between scheme operators, Government departments, NGOs and trade associations. The output of these roundtables was the creation of working groups, each with a specific remit. These included:

- Education, information and grievance mechanisms
- Due diligence and good practice during recruitment
- Due diligence and good practice on-farm
- Scheme costs, recruitment fees, retained earnings and remediation
- Policy, enforcement and stakeholder communication

Due to the recruitment challenges arising from new migratory pathways for workers, in 2022 we worked with other retailers, SWS Operators, the Gangmasters and Labour Abuse Authority (GLAA) and the Association of Labour Providers to launch an app supporting workers joining or thinking of joining the SWS. The multilingual app, Just Good Work, provides users with accurate information during recruitment to ensure they are treated fairly and protected from hidden exploitation risks. It is hoped that by providing this support, workers have a positive experience when working in the UK horticultural industry so that they wish to return the following season. Since its launch in June 2022, over 21,000 people have downloaded the app and accessed support in areas such as the application process, fees and charges, the type of work available and worker rights. We are continually working with our partners to further improve user experience and content on the app ahead of the 2023 season.

Health and safety

In last year's report, we identified through our compliance programme that the highest percentage of non-conformances (NCs) against our RSCOP was for health and safety. With 1,540 NCs opened in the year and only 916 closed, we recognised a need to support the sites facing health and safety issues on best practice. To do this, we partnered with iHASCO, an online learning provider, to roll out training to 400 of our Tier 1 sites. Currently 371 sites supplying Waitrose or John Lewis have registered, all of whom were selected to take part based on the criticality of their health and safety NCs.

Each site has 30 online training courses to complete, which range between 15 to 45 minutes each. The aim of these is to improve knowledge at site level for future audits and also to close out current NCs. We have also provided a survey for sites to complete once the training sessions are concluded to gather feedback. We have also uploaded some helpful health and safety checklists for sites to reference.

The deadline given to complete the training is May 2023; however, our contract with iHASCO is until mid November 2023. As of 31 January 2023:

- 309 courses completed
- 102 users logged onto the platform
- 34 sites have completed courses
- 11,240 total number of workers from the 34 sites.

Child labour

Child labour is forbidden by law in most countries but unfortunately continues to be a pertinent risk due to its complexity and interconnection with other challenges such as family work, home-working and poverty.

Our clear expectations around minimum working ages and conditions of work for young people are outlined in our RSCOP. However, we recognise that these are not always adhered to. In cases whereby child labour is found in our supply chains, we use the principles of our [Child Labour Remediation Best Practice](#) to guide resolution. This was demonstrated when a child labour case was identified during our Tier 2 lighting project (see page 9), whereby we followed best practice to work collaboratively with the child and their guardian to ensure their best interests were considered when addressing this complex issue.

Wages

Reducing poverty in banana supply chains

Bananas are one of the most consumed and traded products worldwide, contributing to food security in many countries. They are also, however, a high-risk commodity, both from an ethical and environmental perspective. Since 2010, we have sourced 100% Fairtrade bananas as part of our strategy to address some of these high-risk challenges, which include low wages and poor working conditions.

Unfortunately, the continued devaluing of the supply chains and increased production costs over time has meant workers in this sector remain very vulnerable. Over the course of the year, we have been working with IDH, Fairtrade and eight other retailers to develop a UK retailers' commitment to closing living wage gaps in our international banana supply chains by 2027. This commitment was made public in March 2023, and it means Waitrose will now calculate living wage gaps in banana plantations sourced from chains using the IDH Salary Matrix. We will also implement processes and procurement changes where necessary, partnering with our supplier and other relevant stakeholders like Fairtrade to achieve this goal.

Tea sourcing in Assam

As mentioned in our 2021/22 report, Fairtrade tea sourcing in the Assam region remains challenging, in part due to working conditions, low wages and higher cost of production. Fairtrade has continued its collaboration with industry partners to pioneer a new way of sourcing certified tea in the region that supports farmers and drives improvements for workers.

Alongside our input on the consultations, we are working with Impactt to ensure good standards are upheld in our supply chain, and that we continue to pay the Fairtrade Minimum Price and an equivalent Premium. We will continue to work with Impactt to ensure compliance against standards, and we have enhanced our scope of work to include capacity building workshops on committee training and management training.

Hand made rugs in India

Last year in our Human Rights Report we highlighted our ongoing work looking at traceability and due diligence in our hand-made rugs supply chain. Building on the capacity building training of our India Sourcing Office (ISO) Partners, our local partner, ASK India, conducted 17 site visits between July and October 2022 at a range of our hand-made rugs factories and their sub-contracting units. The major findings from these site visits were Health & Safety related. However, key findings were also found relating to informal ways of working, minimum wages and worker representation. For details of how we will further this work, please see page 20.

Gender and discrimination

Gender equality

Last year, we set ourselves a target that by the end of December 2022, we would invest over £100,000 from our Global Strategic Fund (which is 15% of funding accrued from relevant Foundation product sales) into innovative climate-related programmes. The Global Strategic Fund is designed to enable farmers and workers to better manage the effects of climate change, and has a particular focus on the inclusion of women and youths. The first programme investment was approved last year for £115,000 in East Africa, where we are supporting suppliers to improve their livelihoods, diversify household incomes and deliver climate resilience projects to 4,500 farmers and workers.

We are aware that women are often disproportionately impacted by climate change but are often not consulted in the development of the strategy, which means the plans don't address their needs. Of the beneficiaries from this programme, 2,250 women will also be supported by programme activity to enhance women's leadership in climate smart agriculture. Following a gender-sensitive needs assessment, a series of pilot interventions to improve women's leadership roles and responsibilities will be delivered. The gender addition to the programme is supported by the Foreign, Commonwealth and Development Office's Work and Opportunities for Women Programme. The gender project follows two research projects carried out in 2022 which investigated the existing climate-related impacts on women in East African horticulture supply chains, as well as the potential positive and negative impacts of net zero strategies on women workers.

Collaborations

We recognise that systemic issues cannot be resolved by the Partnership alone, and on that basis we participate in a number of industry initiatives, forums and membership communities that engage on global human rights issues.

Collaboration enables all involved to bring about change in an effective way utilising our combined resources, experience and leverage.

International Accord and Pakistan Accord

John Lewis has been a signatory of the International Accord (formerly Bangladesh Accord) since its inception in 2013 to improve factory building safety in Bangladesh. In January 2023 we also became a signatory of the Pakistan Accord to ensure worker health and safety standards in our garment and textile supply chains in Pakistan.

At the end of 2022/23, we had 18 active apparel factories in Bangladesh, all of which were registered on the International Accord programme and who actively participated in their site audits and any follow-up action plans.

In 2022, we also joined a working group to create a Human Rights Due Diligence (HRDD) survey to be used by International Accord signatory brands. The survey received 98 responses from individuals across 79 organisations and provided valuable information on the human rights risks in their supply chains and the appropriate HRDD mechanisms to address them. These findings included living wages and restricted freedom of association/collective bargaining, and identified improved traceability as the highest-ranked mechanism to address these risks. In response to these findings, the working group is now facilitating discussions to explore areas highlighted as beneficial for International Accord signatories.

Ethical Trading Initiative (ETI)

Focusing on fresh produce supply chains through our collaboration with the ETI this year, we have continued work through the Italy Fresh Produce Working Group (see Training on page 16).

Spanish Ethical Trade Forums (Asociación Foros De Comercio Ético)

During the last year, the Spanish Ethical Trade Forums have been set up as an Association to enable smaller organisations to join as members. This enables them to attend events to receive support and learn from a range of stakeholders on key topics.

Examples of some of these topics include ensuring worker health and safety provisions are in place, taking action against human trafficking and making sure that strong complaint mechanisms are in place.

UNSEEN

This year, we worked with UNSEEN to offer individual on-site training with 11 of our UK-based general merchandise suppliers to demonstrate how they carry out gap analyses and risk assessments. The visits were designed to increase suppliers' awareness of risks at their sites, and to support them in identifying workers at risk of slavery and other work exploitation, so additional risk mitigation could be put in place.

Food Network for Ethical Trade (FNET)

As active members of FNET, we helped develop guidance to increase the number of worker representation committees in the UK. Developed by nGage, a human resources consultancy, the guidance supports businesses in implementing worker engagement and demonstrates why it's important and effective to have worker representation in place. In 2022/23, the training was provided to 40 attendees over four sessions, two online and two in-person. We cannot guarantee, however, that all attendees work within our supply chains.

To ensure the training was as effective as possible, it was split into three areas: how to establish a worker representation committee; how to relaunch an existing one; how to be an effective worker representative. In the follow up survey, half of attendees at the manager sessions said they had since implemented changes regarding the worker committee at their site. This included relaunching an existing committee, providing training using the resources from the project, and writing a formal job description for the post of worker representative. Managers also reported encouraging their suppliers to attend the training and included having a worker committee as one of their ethical KPIs.

Modern Slavery Intelligence Network (MSIN)

The Partnership is proud to be a part of the Modern Slavery Intelligence Network (MSIN), set up in 2020 as a direct response to Operation Fort, the West Midlands Police operation which uncovered the largest-ever UK modern slavery network in 2019. It is a not-for-profit pilot collaboration between 15 retailers and Tier 1 suppliers allowing members to share related information across supply chains to bring about direct action to improve worker welfare.

Formally launched in 2022 with underpinning legal arrangements, the data collaboration allows members to share information securely to identify labour exploitation and take appropriate action. Stop the Traffik, who runs the database, then uses the information to pinpoint areas where workers are more vulnerable and to track instances of exploitation to better inform deterrence activity.

The Partnership has continued to play an active role in the MSIN throughout last year as the network plans growth and readies itself for an expanded membership. By playing our part in tracking indicators of workforce vulnerability, we are helping Stop The Traffik to improve detection of labour exploitation and put prevention strategies in place.

Issara

In August 2022, Issara (an independent NGO tackling human trafficking and forced labour) conducted a worker survey at one of our Food supplier sites in Thailand. The survey looked at worker satisfaction and recruitment practices. Since conducting the survey, Issara have analysed the results and begun discussions with the site to clarify findings. Once we have received the final report we will look at how to support the site to overcome shortfalls and improve recruitment practices.

For more details about our ongoing collaborations, visit the Partnership website.

Improving livelihoods

People feeling able to express their views is an important part of improving their livelihoods. We have a target to improve the livelihoods of more than 200,000 workers by the end of 2025 and our guiding principle for achieving this is to ensure ‘worker voice’ is at the heart of any programme activity.

Better Jobs programme

Our Better Jobs programme has been running since 2019 and this year we rolled out the worker survey to supplier sites in two new countries, India and South Africa. For further details of our Better Jobs programme see the Partnership website (here).

India

This is the first year we have engaged suppliers in India to participate in the Better Jobs programme. We had 10 suppliers participate with one factory represented by each supplier, and we collected 6,119 survey responses from workers. This represented a completion rate of over 59% of these suppliers’ workforce.

We set up a local advisory group for the programme, working with three experts to review the findings from both the worker and manager surveys to reflect ways of working and customs.

This year we also introduced a new IT solution through a partnership with Labor Solutions, to trial a technology platform that would be scalable across multiple sourcing regions using different formats.

Our India Sourcing Office (ISO) Partners led the engagement of suppliers to complete the survey and review the results, supporting them to develop initiatives and company objectives that address issues arising from their results.

We have been able to identify a number of key insights from the first year of this programme in India. These include:

- Workers with caregiving and family support responsibilities (including childcare) are more vulnerable to experiencing stress at work, especially women. This represents 74% of all workers that completed the survey. 78% of the survey respondents are the primary provider in the family, and 46% are the only income provider, demonstrating the importance of this job for workers’ families’ livelihoods. Factories could be doing more to support workers to deal with the pressure and anxiety.
- This stress can then be exacerbated by work-related factors such as uncomfortable interactions with supervisors and co-workers. Despite all sites having programmes in place to detect and prevent gender-based violence and sexual harassment on site, 18% of female workers and 17% of male workers said their supervisors or co-workers have touched or spoken to them in a way that made them feel uncomfortable. Of the workers at one site that reported being made to feel uncomfortable, 92% were male, illustrating this abuse can happen to both male and female workers. Workers don’t always identify this behaviour as abusive, however.
- In response, these findings were presented along with recommendations from the advisory group that suppliers should develop and implement policies to address this and also establish clear grievance channels for reporting it.
- 98% of workers said they’ve received the training they need to perform their jobs safely and appropriately, and 96% of workers said they received regular feedback on how they’re doing in their jobs.
- 96% of workers agreed that their jobs offer good prospects for career advancement.



CASE STUDY

Reviewing purchasing practices

The India Better Jobs management survey results showed that most sites felt there was good communication with the Partnership in place.

All sites agreed that production and ethical trade requirements from the Partnership are clear and easy to understand, and almost all sites agreed the Partnership negotiated prices in an open and transparent way, with a clear understanding of labour costs.

Sites disclosed that in relation to changes to orders or cancellations, the impacts on their sites included:

- Needing to rework the entire production schedule
- Sites bearing extra costs
- Raw materials being wasted
- Warehouse space taken up to store additional goods
- Impact on business growth

Six out of the ten participating sites indicated there is evidence that the Partnership have made last-minute changes or cancellations outside of exceptional circumstances. Commercial and Human Rights teams will work together to understand this issue in more depth and explore what changes can be made to mitigate any negative impacts.

South Africa

This year was also the first time we undertook the Better Jobs worker and management surveys in South Africa. Two suppliers completed this pilot, which was the first time agricultural sites have participated in the worker voice survey. Respondents were berry growers and packers. Between the two suppliers, 14 sites took part, with a total of 607 workers completing surveys (approx. 66% of the workforce).

The questions were devised in consultation with the South Africa Advisory Group, who in turn were selected for their impartiality and local expertise. For the first time, the survey was completed with optional audio questions alongside the written questions in an attempt to overcome potential literacy issues. The survey was also translated into the five main languages used by workers and included the migrant and seasonal workforce. The sites were located between the north region of South Africa and the South and Western Cape.

One significant finding was that 14% of those surveyed had experienced physical or verbal abuse in the workplace. The suppliers are now addressing those concerns at each site and we will support them through training and by sharing practical steps taken by other Better Jobs participants in other countries.

We concluded from the pilot that the new audio translations alongside the written questions were helpful – participating suppliers were keen to repeat the survey at intervals to track progress on worker voice issues. Participation via the data platform was fairly simple and it was helpful that the survey could be completed remotely via phone, laptop or in an appropriately confidential work setting. Good engagement with the suppliers/ growers concerned ensured a high response rate which included migrant and seasonal worker inputs. Overall lessons from this pilot include a recognition that an audio format does allow for greater inclusion: it allowed us to gather opinions from those we might not have otherwise heard. The extension to agricultural workers was also really positive and the successes have given us a starting point to gather the views of other workers in our supply chains beyond a traditional workplace setting.

China

We made the decision in 2021 to run the worker and management survey every two years rather than every year, so that we could focus on positive interventions in the second year. As a result of responses from the 2021 Better Jobs China worker survey, which showed that 23% of workers felt anxious and under pressure, five sites were selected by our Hong Kong Sourcing Office to participate in 1:1 training in August focused on improving workers’ experiences at work. This training was delivered in a train-the-trainer format, so that further expansion can be carried out.

Following the training, each participating site created its own resilience action plan and they now provide monthly updates to our implementation partner, Carnstone, to check and track progress. Carnstone has also developed five case studies and five videos which are being posted on the workstream’s dedicated WeChat public account, with guidance from the China Advisory Group. The case studies focus on five key topics, including flexibility at work, financial support, caregiving support and responsibility and work-life balance.

UK

In response to the management and worker surveys completed by participating UK suppliers on the Better Jobs programme in 2021, we scheduled a leadership development course on the topic of ‘Forming a Growth Mindset’. Six UK managing directors participated at the in-person event; between them they were able to use what they learned to positively impact the workplace experience of 909 workers.

The Waitrose Foundation

The Waitrose Foundation seeks to improve the livelihoods of those who grow, pick and pack our fresh produce. In 2022, we generated £2.2m for the Foundation through the sale of more than 200 products such as citrus fruits, grapes, flowers and berries sourced from over 400 Foundation farms in nine countries across Africa and Central America. Along with our five implementation partners, we used these funds to deliver over 180 projects benefiting 59,000 farmers and workers, as well as 80,000 community members.

Other projects the Foundation has delivered include: the expansion of our microloans programme in East Africa, primarily used to fund school fees and income diversification projects; the ongoing school farm competition in Ghana to inspire young people into agricultural careers; energy saving measures in the homes of workers in South Africa.

After delivering a two-year Covid response and recovery campaign throughout 2020 and 2021, in 2022 our Global Strategic Fund tackled the new theme of improving livelihoods through climate resilience until 2025. Our programme investment started in East Africa, as detailed on page 13.

Beyond the project delivery, we have continued to strengthen the Foundation’s governance and operating processes by implementing a new Monitoring, Evaluation and Learning framework. We’ve also enhanced reporting frameworks and introduced new independent members to the regional steering committees members.

For more information on the Waitrose Foundation activity, see our 2022/23 Waitrose Foundation Annual Report.

Training

Ensuring our Partners and suppliers have up-to-date knowledge and awareness of human rights risks is essential to enable us to prevent and tackle modern slavery and human rights abuses within our supply chains.

Partner training

As with last year, our bespoke online modern slavery training module aimed to reach 100% of Supply Chain Partners who are most likely to be working alongside agency workers during the peak season. We updated the training package, which focuses on ‘spotting the signs’ of modern slavery and how to report any suspicions. 98% of our Supply Chain Partners completed the training, reaching more than 2,100 Partners in total.

We also provided training for 16 Quality & Technical Partners on our ethical compliance programme. Waitrose Partners additionally completed a Stronger Together introduction course called ‘Tackling Modern Slavery in UK Businesses’, using our Stronger Together, Responsible Recruitment Toolkit.

Supplier training

In 2022, we began a health and safety training programme supporting suppliers to build their knowledge and capability so they can identify and address a range of different issues in their own supply chains. We have implemented this with a third-party supplier, iHasco (see page 12).

Waitrose Foundation farm workers have continued to benefit from a variety of training programmes that build capacity and improve skills. In South Africa, the ongoing training courses have included Worker Committee Development, Project Coordinator Development and People Management for Supervisors. Together these supported 253 beneficiaries who make up part of the 109 worker committees in the region. In Senegal and The Gambia, 45 members of four worker committees were trained on identifying community needs and the development of project plans. In East Africa, the Foundation delivered the Emerging Leaders training programme, which helps bring financial literacy skills and income generating activities to 700 farmers, workers and their dependents.



Forced labour and modern slavery continues to be one of our most salient human rights risks to the Partnership. Based on the data available, we chose to focus on modern slavery training for UK furniture suppliers. In collaboration with other furniture brands, a workshop was hosted by SFA in October. There were 44 representatives in attendance, from both brands and suppliers, with representatives from five own-brand suppliers and one branded supplier to the Partnership attending. The content covered modern slavery, recruitment and labour legislation, best practice examples and escalation/remediation guidance.

As noted in the collaborations section, building on the work of the ETI Italy Fresh Produce working group in 2021, in 2022 eight capacity building resources were released and two working relationships with local and international organisations were established. In addition to this, 38 suppliers have been trained in due diligence and two additional webinars on responsible recruitment were scheduled for February 2023. Work continued with local NGOs running a state-funded local multilingual help desk and grievance mechanism that provides migrant workers with information on local services. In its first year of activity the helpdesk

received 1,538 enquiries. These resulted in ten workers receiving information on government-funded projects, 217 workers accessing legal advice services, 218 being referred to other agencies, and 46 being referred to protection and regularisation services. 40% of the users were agricultural workers; however, we cannot verify whether they were working in Food and Grocery supply chains supplying our Partnership. In June 2022, 12 suppliers came on board to promote the help desk services to their migrant workers, while helpdesk promotional material was distributed to three suppliers in the top tier of the tomato supply chain to spread the word to production sites and workers.

CASE STUDY

Training and building capability



We partnered with UNSEEN to provide specific training for John Lewis UK-based furniture suppliers. A total of 58 individuals, representing 44 suppliers, attended the three training webinars. The subject matter covered understanding worker exploitation and high-risk factors for labour exploitation, as well as good recruitment practices, grievance and escalation processes. It also set out some practical steps to ensure worker wellbeing and worker engagement. The final webinar reflected on generic findings from visits to our own suppliers within the group and recommended effective risk-mitigation responses to the findings.

One key finding was the importance of establishing clear communication channels for workers to give feedback and it was highlighted that suggestion boxes or employee surveys provide an effective way of gathering wider anonymous feedback. From a recruitment perspective, suppliers were encouraged to check that hard copy personal identification evidence was provided on the first day in work following initial recruitment checks. They were also encouraged to offer contracts in employees' first language and to offer support with printing payslips where necessary, as well as clearly advertising pay scales and policies so workers are aware of their pay status. UNSEEN also emphasised the importance of workers being made aware of how to access important policies such as those for grievance processes and for tackling modern slavery, as well as being made aware to 'spot the signs' of the latter.

UNSEEN's 'gap-finding' work was informed by in-person site assessment visits to nine of our furniture suppliers, where they worked with the management and shopfloor teams to make recommendations for mitigating the risk of modern slavery and labour exploitation. They also demonstrated practical improvements to on-site communications and processes. The visits led to the conclusion that management perception of the policy and procedures in place was not matched by the shopfloor understanding, with workers often unaware of some of the processes in place and how to seek further information. All sites received a personalised follow-up report including practical recommendations to address the findings, as well as access to the training webinars.

The training and site assessments provided by both SFA and UNSEEN have undoubtedly helped raise awareness of modern slavery risks and the importance we place on mitigating them as part of the John Lewis supplier relationship. They have also helped our suppliers foster relations and benefit from sharing information with one another at the events.

Stronger Together and Responsible Recruitment Toolkit training
 In 2022/23, we committed to ensuring increased engagement of our Tier 1 UK-based Food and Grocery sites with our Stronger Together and Responsible Recruitment Toolkit. We reported that representatives from 44 own-brand supplier sites attended Stronger Together's 'Tackling Modern Slavery in UK Businesses' (TMSIUKB) course in 2021, and 14 completed the 'Introduction to Responsible Recruitment' training course in 2020 and 2021. These figures equated to just 8.1% and 2.5% of our eligible Tier 1 UK-based Food and Grocery sites respectively. In 2022, representatives from 11 own-brand supplier sites attended TMSIUKB and six completed the 'Introduction to Responsible Recruitment' training course, equating to just 2% and 1.1% of eligible sites. For 2023, we have set a target of ensuring 25% of eligible sites will have completed TMSIUKB and 10% will have completed 'Introduction to Responsible Recruitment' within the last three years overall. These figures will include supplier sites that have completed the training between 1 February 2021 and 26 January 2024.

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Effectiveness of our due diligence programmes

Non-conformance closure

Last year we reported an increase in non-conformance closure from 846 in 2020/21 to 1,396 in 2021/22. A non-conformance is any breach of the requirements of RSCOP. It can be classified as minor, major, critical or business critical. To ensure that we retained a focus on continuous improvement within our supply chains, we set ourselves a target of closing 20% more non-conformances in 2022/23. In total we closed 139% more non-conformances. As this increase was so high this year we are retaining the target of a 20% increase year-on-year.

Spot checks

To test the effectiveness of the due diligence within our Ethical Compliance Programme, we conduct spot checks using audits (namely SMETA two-pillar audits) or tailored methodologies at relevant sites and farms in our global supply chains. We set ourselves a target to complete 16 (an average of four per quarter) spot checks this year, and we were able to achieve 15 completed. We narrowly missed our target due to challenges with auditor availability in some countries making audits more difficult to book, as well as some capacity challenges within our own team at certain points in the year.

The spot check programme has successfully increased the level of due diligence we have within our supply chains. One of the spot check audits highlighted that migrant workers working at a factory in Malaysia had been looking after their passports in lockers at the factory. This had not been flagged in previous audits undertaken at the site. The factory were very proactive in resolving the issue as they had put the lockers in place at workers' request so they had somewhere safe to store them. Recognising the risk with the approach they had taken, the site has since implemented a new system and had the non-conformance closed out.

Effectiveness of our processes

Our partnership with SFA this year found no evidence of modern slavery within our operations or service supply chains (see page 10), demonstrating the effectiveness of our current processes and procedures. However, we recognise that there are always further improvements that can be made.

Grievance mechanisms and whistleblowing

All workers in our supply chains are encouraged to raise any workplace issues they have via site-based grievance mechanisms, or alternatively to use external resources such as hotlines hosted by Stronger Together, Issara and the Modern Slavery Helpline. These channels enable individuals to contact the Partnership with their issues and all cases are managed in line with our internal whistleblowing process.

We are committed to harnessing a culture of speaking up within our business and our supply chains; in order to maintain an environment where workers can report grievances to us, we continue to utilise a range of sector and location-specific whistleblowing channels.

In 2022/23, we had 47 reports from whistleblowers, a significant increase from the previous year. Most came via Issara, demonstrating it continues to be an effective and reliable channel through which workers can have their concerns heard and dealt with. Where cases are reported, we work collaboratively with other brands and retailers involved, as well as other stakeholders, to understand more about the issue and reach a resolution that works for all parties.

Whistleblowing cases

Contact method	2022/23		2021/22		2020/21	
	Cases	Countries	Cases	Countries	Cases	Countries
UNSEEN business portal	2	UK	2	UK	4	UK
Local MP	0	UK	1	UK	1	UK
Media	3	UK, Greece	7	UK, Spain, Portugal, Malawi	2	UK
Trade unions/Industry bodies	0	N/A	1	Bangladesh	2	UK
Issara	25	Thailand	15	Thailand	1	Thailand
Sedex/Audit company	1	China	1	UK	1	China
Direct letter from a whistleblower	0	N/A	1	UK	5	UK
ETI/Other NGO	4	UK, Sri Lanka	1	UK	1	Zimbabwe
Direct from Tier 1 supplier	6	UK, China, Thailand	0	N/A	3	UK
Direct from authorities	0	N/A	0	N/A	1	UK
International Accord	6	Bangladesh	0	N/A	0	N/A
TOTAL	47		29		21	

Looking forward

We are proud of what we have achieved this year to protect the human rights of those working within our supply chains, but there is always more to do.

Ethical compliance with our RSCOP

As noted in the Basic working conditions section (page 7), in 2022 we refreshed our gap analysis of ethical risks within our GNFR supply chains. Through this process we have identified areas where we can improve due diligence processes and one of the key focuses for the next year is to develop a plan to close these gaps along with a road map for implementation.

Addressing broader human rights through collaboration

Living incomes

In 2023/24, we are undertaking a research study across our Waitrose Foundation horticulture farms in East Africa to understand gaps in living incomes and how Foundation programme activities have contributed towards closing them. We hope the findings will inform how future Foundation initiatives can further support progress towards living incomes.

Safeguarding

At the beginning of 2023 we started an enhanced safeguarding programme for the Waitrose Foundation. The programme includes the review and strengthening of existing policies, procedures and frameworks. Recognising the regional steering committees and global board's importance in the oversight and decision making of Foundation activities, we have delivered bespoke training workshops for each group on safeguarding risks and how to manage these in accordance with our new policies and procedures.

Responsible recruitment

We know our suppliers continue to face challenges and pressures from labour shortages, exacerbated by the conflict in Ukraine, from where a large proportion of seasonal workers who came to the UK for the 2021/22 season originated. The complexities with the seasonal workers scheme also creates higher risk for migrant workers coming to the UK from abroad. We will continue to work closely with other retailers, industry groups and the Government to highlight where improvements can be made and to ensure workers' rights are protected in line with our human rights policy.

Kenyan tea HRIA action plan

Following the publication of our action plan, we will collaborate with the Kenyan Tea Development Agency and other stakeholders to develop projects and initiatives that deliver improvements across the areas highlighted in the HRIA. We will assess where we have existing models and frameworks in place with other stakeholders that can be adopted by this group of suppliers and we will also share learning to facilitate scaling these up.

China gender training

Female workers make up the 66% of workers in factories in China supplying the Partnership with textiles. Evidence from our Better Jobs survey results in 2021 show that women tended to feel that their prospects for career advancement were less than those of men and the insight showed that investing in wellbeing programmes for women was beneficial. We have commissioned a programme of work for delivery in 2023, raising awareness and knowledge of gender specific issues impacting on workers ability to feel respected and heard. The training will support factories to create enabling environments for dialogue and prepare workers with a willingness to engage, which will lay the ground work for addressing these issues in the factories.

Pakistan Accord

Although we and other retailers were invited to sign the Pakistan Accord in January 2023, work with the factories will not begin until late 2023, which means we are not likely to have much to report until 2024. This is to ensure all International Accord signatories have had sufficient time to sign up, and so work with local colleagues can take place on-the-ground to ensure effective local input.

Ensuring all workers have the voice and capacity to drive improvements in their livelihoods

Migrant workers in wild-caught fishing supply chains

Following delays in filming due to inclement weather at the end of last year, the worker welfare education films are due for completion in the first half of 2023. These films will be circulated via industry networks utilising different forms of media and we will be working with partners to measure the effectiveness of these films.

Rugs in India

Following the assessment visits carried out by ASK India in 2022, the team at ASK are analysing and will be offering clear recommendations for next steps. We will then develop an action plan and will report on progress in next years report.

Just transitions

Enhancing the programme highlighted on page 17, the Waitrose Foundation has now committed to investing £1 million into climate resilience programmes by the end of 2025, which will directly focus on supporting improvements to the livelihoods of workers and smallholder farmers in these supply chains.

Legal statement

This report outlines the steps John Lewis Partnership has taken during the financial year ending 28 January 2023 to protect the rights of workers in our operations and the supply chains of goods and services provided to our business. Based on the areas recommended by the Home office, we include disclosures on the following:

- a. Organisation structure and supply chains (see p. 3)
- b. Policies in relation to slavery and human trafficking (see p. 5)
- c. Due diligence processes (see p. 6-10)
- d. Risk assessment and management (see p. 7-14)
- e. Key performance indicators to measure effectiveness of steps being taken (see p. 19)
- f. Training on modern slavery and trafficking (see p. 17-18)

This group statement of John Lewis Partnership plc (the parent company) has been published in accordance with the Modern Slavery Act 2015 (the Act), and also covers its subsidiaries John Lewis plc and Waitrose Limited.

This report and statement has been approved by the Board of John Lewis Partnership plc on 13 July 2023 and signed on its behalf by:



Sharon White
Chairman

Who we work with



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JOHN LEWIS

WAITROSE