Modern slavery in the construction sector
Roundtable summary report 2025

Cabinet Office

CCLA GOOD INVESTMENT

SUPPLY CHAIN SUSTAINABILITY SCHOOL

LGT Wealth Management

Summary

On 21 October 2025, CCLA convened senior leaders from the construction sector alongside investors, government representatives and survivor advocates to discuss progress in tackling modern slavery across both labour and material supply chains. The event, moderated by Dame Sara Thornton, CCLA's Director of Modern Slavery and former Independent Anti-Slavery Commissioner, built on the foundations of the 2024 summit.

With the government emphasis on growth including a target of 1.5 million new homes by the end of this parliamentary term and a renewed emphasis on business and human rights, the construction sector is firmly in the spotlight. Government initiatives – including the Employment Rights Bill, the forthcoming Fair Work Agency, and ongoing Foreign, Commonwealth & Development Office, Department of Business and Trade, and Home Office reviews – have emerged as critical levers driving accountability.

Helpline data from Unseen underlines the risks: in 2024, their modern slavery helpline recorded 104 cases and 492 potential victims linked to construction. Internationally, key construction materials are often sourced from jurisdictions with weak human rights protections and, as demand increases, so does the risk of importing goods tainted with forced labour. It was telling that a poll conducted during the event indicated that 78% of attendees believed the risk of modern slavery in the sector is increasing.

▼ Jess Phillips MP, Minister for Safeguarding; Dame Sara Thornton, Director of Modern Slavery at CCLA; and H.S.H. Princess Adelheid von und zu Liechtenstein, Non-Executive Director at LGT Wealth Management, at the roundtable

> ‘If companies aren’t finding modern slavery, they’re not looking hard enough.’
>
> Minister for Safeguarding
> Jess Phillips MP

Why construction is high risk

Construction continues to rank among the highest-risk sectors for modern slavery and labour abuses. According to the Director of Labour Market Enforcement, this is driven by:

- physically demanding working conditions
- absence of arrangements for collective representation of workers
- high reliance on migrant labour
- workplaces where workers are less visible or may be isolated
- jobs where housing and visa-status is linked to employment
- subcontracting and false self-employment.

As one senior official noted, construction operates in many ways like a gig economy, where constant subcontracting entrenches precarity and limits workers’ ability to effectively report abuses. Instances such as the HS2 case involving Danny Sullivan Group (where umbrella contracts were used despite expectations of payroll inclusion) illustrate the structural vulnerabilities that leave workers exposed and hinder enforcement of labour rights.

Government sights set firmly on construction sector

Undoubtedly, a central theme of the roundtable was the government’s new focus on the construction sector – not only as one of the UK’s highest-risk sectors for modern slavery, but also as one of the greatest opportunities to drive national growth. Jess Phillips MP, Safeguarding Minister for the Home Office, reminded delegates that the drive to deliver new homes and major infrastructure must not come at the expense of the people who build them. Protecting workers, she said, is both a moral duty and an economic necessity. Drawing on personal experience, Phillips reflected on her husband’s decades working in the construction sector, which then represented fair wages, safe conditions and job security. She emphasised that this should be the standard for all workers today.

Phillips set out the government’s renewed focus on human rights within business, referencing updated Transparency in Supply Chains (TISC) guidance and the forthcoming Employment Rights Bill. These reforms are designed to move beyond transparency, towards accountability and enforcement. ‘If companies aren’t finding modern slavery,’ she observed, ‘they’re not looking hard enough.’

Public sector spending, accounting for hundreds of billions annually, is one of the most powerful levers the Government can pull. The 2023 Procurement Act introduces tighter scrutiny of supply chains, requiring suppliers to demonstrate fair work practices and robust due diligence, with five-year debarment consequences for those found to be in serious violation.

Government officials, including Jess Phillips, made clear that embedding fair pay, safe conditions and ethical recruitment is not only the right thing to do; it reduces financial and reputational risk and delivers better long-term value for businesses and society.

Survivor testimony and empowerment

Delegates were privileged to hear from Malaika Oringo, founder and CEO of Footprint to Freedom. Footprint to Freedom empowers survivors of human trafficking and modern slavery, advocating to centre their voices and leadership in decision making for policy and responsible business practices.

In one of the most poignant moments of the event, Oringo referred to her experience of human trafficking and her determination to be 'the last victim'. She had recently been in the Democratic Republic of the Congo listening to the experiences of the women and children who work in the cobalt mines and had concluded that grievance mechanisms often fail vulnerable people in practice, excluding those with limited literacy, language skills, or access. Oringo emphasised that ethical hiring, transparent supply chains and active survivor leadership are fundamental to building truly safe, fair workplaces in the construction sector.

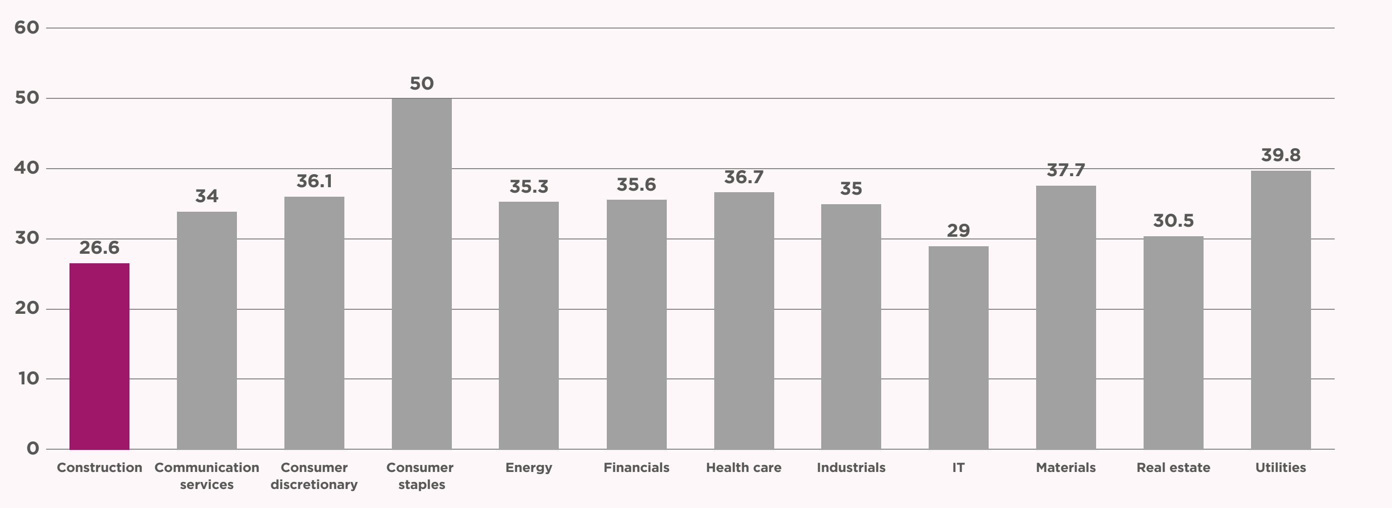
> 'How can a building stand tall if its builders are broken in the process? We cannot build ethical buildings on unethical work.'
>
> Malaika Oringo, founder and CEO of Footprint to Freedom

Due diligence alone is not enough

A key intention of the day was to take stock of the sector's progress in implementing strong due diligence and risk assessment practices. Dr Martin Buttle, CCLA Better Work Lead, presented stark benchmarking data showing the performance of construction companies in the Find it, Fix it, Prevent it framework, showing construction as the lowest-performing sector.

Construction companies, when broken out and evaluated as a separate sector, scored 26.6 – significantly below other sectors such as consumer staples (which average 50). The lowest scores were observed in the 'Fix it' category, suggesting a lack of activity to redress harms, followed by gaps in identification and preventive measures. Overall, disclosures remain overly policy-focused, with too little detail on active due diligence or tangible remediation.

AVERAGE SCORES 2025



Visibility and intelligence still falling short

Discussions around due diligence and visibility revealed how far the construction sector still has to go in developing mature intelligence-gathering systems. While many businesses have improved awareness and reporting processes, participants reflected that the structure of the industry continues to obscure visibility at the site level. Persistent reliance on subcontracted rather than payrolled labour means that responsibility for worker welfare is often fragmented, leaving space for bad actors to operate undetected.

One of the most thought-provoking exchanges of the day centred on the lack of feedback from law enforcement when cases of suspected exploitation are reported. Several participants described how cases passed to police or specialist helplines often disappear into a 'black hole', leaving companies wondering whether their suspicions were substantiated. Law enforcement representatives in the room acknowledged these frustrations, noting that confidentiality around ongoing investigations sometimes rightly limits the information shared. They nonetheless encouraged businesses to continue reporting concerns.

If labour visibility remains difficult, the materials supply chain is still less mature. Material supply chains further amplify risk, with many critical inputs – such as timber, stone, paints and pigments – being sourced from regions with limited labour protections. Delegates agreed that while awareness of labour risks has grown, human rights risks in the sourcing of materials – particularly as demand for rare earth minerals rises to fuel the renewables transition – remain insufficiently understood. Representatives

▼ Dame Sara Thornton addresses the delegates

from DEFRA signposted work being undertaken to identify and flag high-risk geographies where enhanced due diligence may be appropriate.

Key resources

During proceedings, data from the Unseen Helpline demonstrating the scale of modern slavery in the construction sector was shared with delegates. Unseen's Modern Slavery Helpline is a key resource which offers free and confidential support 365 days a year, not just for workers directly, but also for contractors to share intelligence, access training and resources and carry out worker welfare.

Footprint to Freedom facilitates partnerships between governments, academics, non-profits and other stakeholders, to bridge the gap between survivor-led organisations and key actors. Through their work, firms seeking to leverage survivor experience to better identify where their visibility is failing, can access expertise and guidance on how to give survivors a seat at the table when shaping policies and practices.

Attendees were also encouraged to access resources from the Supply Chain Sustainability School, which provides over 250 free resources such as the modern slavery toolkit and events tailored to combating slavery in the built environment. The Supply Chain Sustainability School is backed by 220 main contractors, house-builders, infrastructure clients and FM service providers.

The Anti-Slavery Risk Tiering Tool from the Cabinet Office supports compliance with the Modern Slavery Procurement Policy Note by helping users assess the risk of a procurement and identify appropriate next steps. Though designed for government departments, it's publicly available for anyone to use. The tool can be accessed directly here. A feedback survey is embedded in the tool to help capture its value and inform future improvements.

Elsewhere, specialist guidance and training provided by the Ethical Trading Initiative also seeks to promote best practice and provide a roadmap for stakeholder engagement.

Alliances like these can foster exactly the kind of pre-competitive information sharing the sector needs.

Takeaways and next steps

A key distinguishing theme that emerged from this year's roundtable was the renewed government focus on the construction sector. The updated TISC guidance and forthcoming Employment Rights Bill are just two examples of the new standards the construction sector must rise to meet. Several delegates further argued that the government needs to go beyond a voluntary approach to due diligence and mandate expectations in legislation. This would provide consistency and level the playing field. Participants agreed that improving the visibility of abuses, addressing structural vulnerabilities in labour arrangements, and embedding survivor voices into due diligence frameworks are critical for sustained progress.

Delegates concluded that addressing modern slavery requires collaborative action. Cross-sector collaboration, including intelligence-sharing networks and industry forums, was cited as essential to eliminate systemic exploitation and ensure fair, ethical practices in both labour and material supply chains. ■

TO FIND OUT MORE

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