

**The role of Partnerships in addressing Modern Slavery in the UK
Event Sector: a narrative approach**

Claudia Macaveiu

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Declaration

This thesis, submitted to Oxford Brookes University in fulfilment of the requirements of the degree of Doctor of Philosophy, represents my original work conducted under the supervision of Dr Rebecca Hawkins, Dr Samentha Goethals, and Dr Rosa Codina-Sotomayor. This thesis does not contain material written or published by others, except where acknowledged, and it has not been submitted to any other university or institution for any higher degree.

Claudia Macaveiu

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Abstract

The need for partnerships has been widely recognised as a step forward to address modern slavery by key actors from the public, private, and third sectors. The form partnerships could take, the roles and contribution of partners, or how they might identify and deliver shared goals and responsibilities, however, have thus far been underexplored areas in addressing modern slavery when businesses are involved. A review of the event sector in the UK shows exposure to exploitative practices with profound implications for workers' human and labour rights (ranging from recruitment fees and debt bondage to reliance on migrant workers, high dependence on seasonal workers, and zero-hour contracts).

The aim of this thesis is to evaluate the role partnerships can play in addressing modern slavery from the perspectives of stakeholders in the UK event sector. To achieve the research aim, the constructivist ontology and interpretivist epistemology underpinning this project seek to understand participants' meaning-making within the context of modern slavery in the field of events. It explores how key actors construct reality, through the review of primary data sources using a *Conceptual Framework* as a foundation for this empirical research. The study is structured into two stages: a document analysis of Modern Slavery Statements, followed by semi-structured stakeholder interviews.

The *Conceptual Framework* is developed from integrating partnership and stakeholder theories and revised after the first stage of data analysis; it allows to analyse different perspectives and to theorise partnership dynamics and the rationale for partnerships to address modern slavery in the event sector. This leads to obtaining a fuller understanding of stakeholders' perspectives on modern slavery and partnership engagement, while also making a contribution to knowledge.

The *Labovian model of narrative analysis* leads to reconstructing five narratives that evidence differences in key actors' perspectives concerning the definition of modern slavery, which informs their rationale for action and their engagement in partnership. The narratives inform the way in which stakeholders from different organisations engage in partnerships, the requisites for meaningful engagement, and the processes for delivering change. They portray key actors' sense-making of problems and solutions where partnerships often play a significant role. Findings lay the ground for future exploration of how modern slavery risks are identified and reported, and how preventative measures are implemented, including the decision to engage in different approaches to partnerships.

This research yields new perspectives on the partnership front which inform four approaches to partnership: *Contractual*, *Transactional*, *Peer-to-Peer*, and *Public Private Partnerships*. These approaches carry both academic and practical contributions to knowledge, as they are integrated in a *Partnership Continuum*. The study concludes that the role of partnerships is not consistently understood by the stakeholders engaged in this research. Partnerships are seen as solutions, opportunities, or relationships, and engagement is regarded proactively, reactively, and even with reluctance by some actors.

Key Words: *partnership, modern slavery, responsibility, narrative analysis, British event sector.*

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Abbreviations

BHR	Business and Human Rights
CIPD	Chartered Institute of Personnel and Development
CSR	Corporate Social Responsibility
DMO	Destination Management Organisations
DD	Due Diligence
ETI	Ethical Trading Initiative
FTE	Full-time Equivalent
GDPR	General Data Protection Regulation
GLAA	Gangmasters and Labour Abuse Authority
HMRC	Her Majesty's Revenue and Customs
HR	Human Resources
HRDD	Human Rights Due Diligence
HRM	Human Resource Management
HT	Human Trafficking
IASC	Independent Anti-Slavery Commissioner
ILO	International Labour Organisation
KPI	Key Performance Indicator
MS	Modern Slavery
MSS	Modern Slavery Statement
NCA	National Crime Agency
NGO	Non-Governmental Organisation
NRM	National Referral Mechanism
OHCHR	The Office of the High Commissioner for Human Rights
PPP	Public Private Partnership
P2P	Peer to Peer
SME	Small and Medium-sized Enterprises
SIC	Standard Industrial Classification of Economic Activities (SIC codes)

SEA	Sustainable Event Alliance
SEDEX	Supplier Ethical Data Exchange
TiSC	Transparency in Supply Chains
UN	United Nations
UNGP	United Nations Guiding Principles (on Business and Human Rights)
UNHRC	United Nations Human Rights Council
UK	The United Kingdom of Great Britain and Northern Ireland

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1 Thesis Introduction

1.1 Research Rationale

The importance of developing partnerships to address Modern Slavery (MS) has been recognised with significant interest from scholars, industry stakeholders, policy makers, and the civil society (Blackburn, Taylor and Davis, 2011; Dean and Marshall, 2020; Christ and Burritt, 2018; Cockayne, 2015; Nottingham Rights Lab, 2018a; Foot, 2016). This view is supported by participants in this research:

‘Without properly considering and fostering partnerships with stakeholders from multiple sectors, it’s very unlikely that the other preventative or prosecuting efforts will succeed.’

(Andrew, Research Officer - NGO, *Action Narrative*)

Yet, the form partnerships could take, the roles and contribution of partners, or how they might best identify and deliver shared goals and responsibilities remain underexplored areas in addressing MS, especially when businesses are involved.

Modern slavery (MS) persists in various forms and contexts, including traditional slavery, bonded labour, sexual exploitation, human trafficking (HT), and forced labour (Quirk 2006; Cockbain, Bowers and Dimitrova, 2018; LeBaron 2018). Measuring the true extent of MS is problematic due to its hidden nature, however researchers believe the number of incidents is significantly underreported, suggesting that there are currently up to forty million victims trapped in the global workforce (Nolan and Boersma, 2019; Bales, 2007; Bales, Hesketh and Silverman, 2015; ILO 2017, GLAA 2022). There is a large body of literature on MS from a variety of historical, philosophical, and social scientific perspectives, primarily focused on preventive efforts and victim protection (Gallagher 2010, Blackburn, et al. 2011, Brunovskis and Surtees 2019). Meanwhile, the organisations susceptible to MS and the types of exploitative practices in business are newer streams of research beginning to emerge over the last decade (Phung and Crane 2018, Caruana et al. 2021, Crane, LeBaron et al. 2021).

MS poses a high risk for industries with dangerous, difficult, and dirty employment, labelled as ‘3D’ conditions (Dowling, Moreton et al. 2007). 3D conditions typically occur in low-paid and low-skilled jobs that require large numbers of flexible, seasonal workers (Dowling et al. 2007, Christ and Burritt 2018, Crane, et al. 2021), particularly, in sectors that experience labour shortages. This includes the event sector, where entry level workers are expected to work long hours and offered low-pay, short-term work (Abson, 2017; Quinn, 2013) and many are employed on ‘zero hour’ contracts (Paraskevas and Brookes, 2018a). Victims of MS in business documented in the reviewed literature are found in a broad range of sectors; they are particularly prevalent in subcontracting chains, many of whom are migrant workers (LeBaron, 2014; Smit, 2011). Sectors at risk include agriculture, construction, cleaning, nursing and care work, domestic work, hospitality, and illicit activities (Smit, 2011; Crane, 2013). The event sector is also characterised by these conditions. A vast number of events are organised by small organisations that are often unable to directly employ staff due to the seasonal and transitory nature of events (Getz and Page, 2016), causing reliance on migrant workers and agency staff which provides opportunities for labour exploitation (Paraskevas and Brookes, 2018a; Paraskevas and Brookes, 2018b)

Labour rights and employment conditions in events and hospitality render workers (many of whom are migrants) vulnerable to exploitative practices and abuse (Lugosi and Ndiuni 2022; Janta et al, 2011). Evidence from GLAA (2022) shows an increased risk of MS and labour exploitation in sectors with a high staff turnover and where jobs are low skill and low wage, giving exploiters ample opportunity to thrive unnoticed. This assessment includes hotel and food services, events, and industries in their supply chains (including cleaning, catering and labour providers), where labour is the most prevalent type of exploitation (GLAA, 2022). Labour exploitation cases identified in the hospitality industry includes criminal practices such as forced labour, bonded labour, criminal exploitation, and forced prostitution, (Smit, 2011; Crane, 2013; Christ and Burritt, 2018)

The complexity surrounding MS as a hidden crime lacking observability (Bales, et al. 2015), is further complicated in a business context (Caruana, Crane et al. 2021). A lack of consensus surrounds how MS is defined by business actors, the types of exploitation that can occur in businesses, and the nuanced interpretation of risk. To make matters worse, the complex supply chains of many organisations pose challenges to identifying and addressing exploitative practices. Notions of subcontracting become further contentious in the context of labour. The UK has the largest, most fragmented agency sector in Europe (Gallagher and O’Leary, 2007; Crane, et al. 2018) with a significant proportion of small, local operators supplying mainly low-status workers (Gold, Trautrim and Trodd, 2015; Balch and Scott 2011). The considerable amount of temporary, casual, and other forms of contingent labour is supplied and often outsourced to third party labour providers (Crane et al, 2018). Intelligence from GLAA (2022) suggests that some agencies based overseas charge recruitment fees to appoint migrant workers in the UK hotel sector.

There is also evidence of employers directly requesting money in exchange for work (GLAA, 2022; 2018). To address the complexity of MS in business legislation has been introduced in several countries (Crane, 2013; Cossart, Chaplier and de Lomenie, 2017; HM Government, 2015; Nolan and Bott, 2018; Stevenson and Cole, 2018; Wen, 2016), however, legislation constitutes a partial solution to the various problems associated with MS and has been criticised for the limited extent to which it leads to changes in corporate practice. In addressing the complexity of MS, scholarship and MS experts suggest enhancing multi-agency work (Sheldon-Sherman, 2012; Cockayne, 2015; Landau and Marshall, 2018), which has been highlighted as crucial in relation to information sharing and the coordination of compliance and prevention action (Broad and Turnbull, 2018; Nolan and Bott, 2018; Stevenson and Cole, 2018).

Therefore, partnership is suggested as a potential solution to address the complexity of MS in both research and practice. Partnerships are an emerging area of research within anti-slavery strategies (Christ and Burritt, 2018; Cockayne, 2015) suggesting that the complex, multi-faceted issue of MS requires a comprehensive response from government and non-government entities in such areas as human rights, labour and employment, health and services, and law enforcement (Bales, et al. 2015; Brunovskis and Surtees, 2019). Although to date partnerships to address MS that include businesses are still underexplored.

1.2 Research aim, objectives, and contributions

This research aims to evaluate the role partnerships can play in addressing modern slavery from the perspectives of stakeholders in the UK event sector. The research objectives are, as follow:

1. To critically review the literature on modern slavery in business environments and the mechanisms to address it.
2. To critically review the literature on partnerships that address complex issues.
3. To critically evaluate the relevance of stakeholder and partnership theories and develop a conceptual framework through which to analyse stakeholders' perspectives and responses to modern slavery.
4. To analyse information available in the public domain reported by event companies about their responses to modern slavery.
5. To map stakeholders engaged in addressing modern slavery in the UK event sector and analyse their perspectives on partnerships to address MS and their rationale for those partnerships using a narrative approach.
6. To draw conclusions about the role of partnership in addressing modern slavery in the event sector.

To achieve the research aim and objectives listed above, this research examines the following research questions:

- a) What is the role of partnership in addressing MS?
- b) What is the rationale for partnership?
- c) How prepared are industry stakeholders to engage in partnerships to address MS?
- d) What does a partnership against MS look like for event sector stakeholders?

The findings inform the way in which stakeholders from different organisations engage in partnerships, the requisites for success, and the processes for delivering change. They provide new insights into the reasons why partnerships are formed based on the perspectives of different categories of stakeholders. On this basis, the research contributes to knowledge, as follows:

1.2.1 Academic Contributions

This research project examines different types of stakeholders and explores their perspectives on the meaning of partnership. The academic contribution to knowledge is twofold; firstly, I develop a conceptual framework based on advanced integration of stakeholder and partnership theories. The application of this conceptual framework leads to interpreting and understanding MS reporting and the perspectives of stakeholders. The two theories are novel to the context of MS in the field of events. I use Partnership Theory to explore the purposes, membership, and outcomes of collaborations that address MS in the event sector, while recognising that players have distinct interests and different levels of commitment (McQuaid, 2000; Hatton and Schroeder, 2007; Powell, 1987; Mohr and Spekman, 1994). Stakeholder

theory is brought in to explore how different categories of stakeholders (e.g. internal/external stakeholders) perceive MS risks, their rationale for action in addressing MS, and engaging in partnership (Freeman, Harrison and Zyglidopoulos, 2018; Donaldson and Preston, 1995).

I use the conceptual framework as a foundation for this empirical research to examine the role partnerships play in addressing MS from the perspectives of stakeholders in the UK event sector. It enables me to map and evaluate stakeholders' engagement in partnerships against MS in the UK event sector. Furthermore, it enables me to theorise partnership dynamics and the rationale for partnerships to address MS in the event sector.

Secondly, the findings enhance knowledge and provide new perspectives on partnerships by evidencing fundamental misunderstandings about their purposes in addressing MS in the event sector. The study contributes to debates concerning partnerships to address complex issues and MS in business by focusing on the event sector. The study highlights distinct interpretations of MS and several inconsistencies in the experiences and perspectives of stakeholders on the partnership front which inform four approaches to partnership development: *contractual*, *transactional*, *peer-to-peer*, and *public private partnerships*. To draw conclusions about the role of partnership I reflect on the experiences of stakeholders to review the appropriateness of partnerships as a mechanism for addressing MS.

1.2.2 Methodological Contribution

The use of narrative analysis is a novel analytical method to gain insight into the role partnerships play in addressing MS from the perspectives of stakeholders in the UK event sector. Specifically, the Labovian Model leads to the development of five distinct narratives focusing on *risks*, *people*, *compliance*, *collaboration*, and *action*, by analysing primary data sets originating from organisations and individuals. The narratives reveal differences in key actors' perspectives concerning the definition of MS, which informs their rationale for action and their engagement in partnership.

1.2.3 Practical Contributions

On a practical level the findings inform industry collaboration and partnership development to address MS in the event sector, by identifying four approaches to partnership in the event sector: *contractual*, *transactional*, *peer-to-peer*, and *public private partnerships*. This leads to the development of a *Partnership Continuum*, which could support the development of partnerships and interventions that enable event sector organisations to collaborate with peers, NGOs, law-enforcement agencies, and policy makers in addressing MS. The Partnership Continuum could enable industry stakeholders to move beyond compliance, by working with external actors to build capacity, raise industry standards, and move towards meaningful partnership engagement. In addition, I provide practical recommendations informed by the findings of this research for policy developers, industry stakeholders, educators, and for third sector organisations engaging in collaboration.

1.3 Research context

This interdisciplinary research project is situated at the intersection of several streams of scholarship, as illustrated in Figure 1.1. The study explores the role of partnership and

implications of MS based on the perspectives of event sector stakeholders by drawing on scholarship on MS in business, the legal frameworks that guide business responses, and partnership research and theoretical framing, which form the context of this research. The research context acknowledges the role of the researcher in the design of the study and the interpretation of results. As highlighted in the figure below, the study contributes to scholarship on MS in business by focusing on the event sector and to debates concerning partnerships to address complex issues linked to business, organisational studies, and public policy. In this introductory section, I draw on these different fields of research to establish their relevance to the research project and I position myself in relation to the core debates discussed in the next chapters. This section sets the context and defines key terms discussed throughout this research project.

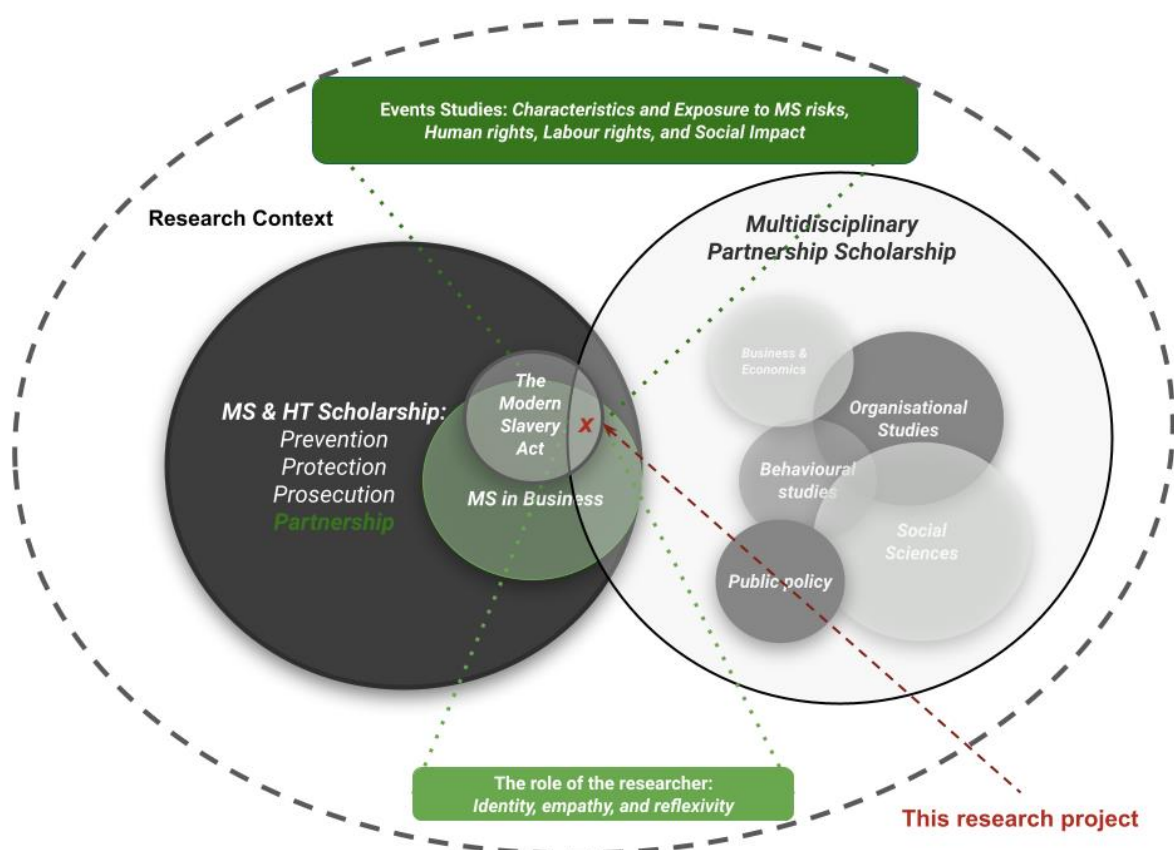


Figure 1.1. Research context

1.3.1 Modern Slavery: a complex issue

MS is an evolving concept that often overlaps with other crimes and human rights infringements. The importance of distinguishing MS, HT, and forced labour as linked but distinct concepts has been recognised in recent management scholarship (Ollus, 2015; Cockbain, Bowers and Dimitrova, 2018). In accordance with the United Nations 1926 Slavery Convention, *slavery* refers to treatment of a person over whom rights of ownership are exercised (OHCHR, 1996). Since 'ownership' of a person is outlawed, the key element of slavery is the behaviour on the part of the 'offender'. This behaviour deprives an individual of their freedom, thus emulating 'ownership' (OHCHR, 1996). *Modern slavery* refers to situations

where one person has taken away the freedom of another for the purpose of economic *exploitation* by: threats, violence, coercion, punishment, abuse of power and/or deception (Bales, et al. 2015). According to the independent Anti-Slavery Commissioner (IASC, 2022) MS is an umbrella term encompassing *slavery, servitude, forced or compulsory labour* and *human trafficking*.

Therefore, according to Bellagio-Harvard Guidelines (2012), MS may be defined as controlling a person in such a way as to significantly deprive them of their individual liberty, with the intent of exploitation through the use, management, purchase, sale, profit, transfer or disposal of that person (Allain, 2012). While Bales (2007) and Allain (2009) believe exploitation to be fundamental in defining MS, Crane (2013) and Gold et al. (2015) place focus on the element of control over a person by a legitimate or illegitimate ‘employer’ by means of penalty or coercion to extract work or services. According to Nolan and Bott (2018), MS is a non-legal term that has contemporary resonance, and that if associated with a business, will more likely than not conjure up a negative image. Legal clarity comes from the definitional elements that might fall within the umbrella term: such as forced labour, slavery, or HT, that are defined in international and national laws.

Due to media coverage and inconsistent use of terminology, MS is often confused with HT and people smuggling; although all can result in exploitation, modern slavery covers a much broader range of activity than HT, therefore a person subject to MS may or may not have been trafficked (Bales, 2007). HT is defined by the EU Directive (European Union 2011/36/EU, Article 2) as: *the recruitment, transportation, transfer, harbouring or receipt of persons, including exchange or transfer of control over that person, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation*. According to Crane (2013) slavery and slavery like practices such as servitude, forced labour, forced or servile marriage, the sale and exploitation of children, and debt bondage includes the crimes of human trafficking. Broad and Turnbull (2018) define MS as including HT, slavery, forced labour and domestic servitude. The term therefore incorporates not only HT but a range of other types of exploitation.

The discursive change from *trafficking* to *slavery* creates a significant change in the perception of the problem and the policy response (Craig, 2014). Craig and Balch (2019) advocate that the term slavery holds a heavier emotional weight serving political functions. But, like the term trafficking, it lacks conceptual clarity and consistency of meaning. The lack of clarity further emphasises the emotional impact of the term slavery, which draws public attention to the issues but also uses the moral dimension as a legitimate basis for policy interventions (Craig, 2014; Craig and Balch, 2019; Broad and Turnbull, 2018; Gallagher 2010). While trafficking is often dismissed as an aspect of people smuggling, there are notable distinctions. *People smuggling*, irrespective of the dangers or the possible ill treatment of the subject during the journey, occurs when the decision to embark on an irregular migration journey has been made with the free consent of the migrant. The labour smuggler will be involved only during the transport process (Richards, 2004; Quirk, 2007; 2006).

The implications of language and terminology used in the context of MS have been recognised by many scholars in the field, whether their research is centred on victims of exploitation (McGaha and Evans, 2009; Moser, 2012) or preventing the crime (Bales, et al. 2015). Moser

(2012) identifies the importance of using uniform language when discussing exploitation because it allows all practitioners to understand the problem and give equal treatment to victims. McGaha and Evans (2009) state that not using common language when discussing MS and HT poses a risk that may undermine credibility related to victims.

The terms 'trafficking', 'smuggling', 'forced-labour' and 'labour exploitation' are used interchangeably within a number of publications in the reviewed literature. This makes it difficult to infer whether it would be more appropriate to adopt alternative terminology to describe particular situations. Gold et al. (2015), Skrivankova (2010), Crane (2013), Christ and Burritt (2018) demonstrate it is imperative to understand that not all forced labour is a result of trafficking and failure to recognise this has a significant impact on victim protection and offender prosecution (Ollus, 2015; Waite et al., 2015; Skrivankova, 2010). The use of unspecific terms carries serious implications for victims of forced labour who are not trafficked and are consequently excluded from protection and assistance programmes designed for victims of trafficking. The impact of such misconceptions is also seen in prosecuting offenders. As Skrivankova (2010) exemplifies, in countries where labour trafficking is introduced into criminal legislation, forced labour is only punishable as an outcome of trafficking compared to other countries where it is still possible to prosecute forced labour even in cases where trafficking is not present (Ollus, 2015; Cockbain et al, 2018).

Defining and distinguishing MS becomes even more problematic in a business context. Gold et al. (2015), identifies three forms of MS in relation to business: chattel slavery, in which people are born, captured or sold into permanent slavery; debt bondage slavery, in which people pledge themselves against loans for an undefined length of time, but their labour does not diminish the debt due to extortionate interest rates or false accounting; and contract slavery, where fake employment contracts lure workers into the trafficking and enslavement process. Crane (2013) and Christ and Burritt (2018), on the other hand, focus their research on labour exploitation, and do not specifically exclude human trafficking, in fact they sometimes use terms such as 'trafficked into slavery' in the context of labour exploitation. Dowling et al. (2007) exclude human trafficking from the definition of slavery and believe it to be concerned with the movement of slaves from one place to another, but not with their use in economic activity. Consequently, they discuss HT as part of the labour supply chain rather than MS in itself. These issues arise largely from ambiguous definitions of MS and exploitative practices (Bunting and Quirk, 2017) leading to the conflation of legal concepts and disagreement over the best approaches to address MS in business (Sarfaty, 2020). Some of these core debates surrounding the interpretation of MS in a business context are reviewed in the upcoming chapter.

For the purpose of this research, I follow the legal definition from Bellagio-Harvard Guidelines (2012) developed by a prominent group of scholars on MS and MS in business from around the world and used by legal bodies. According to this a person is a victim of MS if they are deprived of their individual liberty, with the intent of exploitation through the use, management, purchase, sale, profit, transfer or disposal of that person. This means forced to work, dehumanised, treated as a commodity, controlled by an 'employer', usually through mental, physical abuse, or the threat of abuse (Tallmadge and Gitter, 2017). Definitions and the language surrounding MS play a significant role in conceptualising MS in business. In a business context, the legal definition of MS represents an extreme on a continuum between exploitative and poor labour conditions rather than the basis of it all (Skrivankova, 2011; Tallmadge and Gitter, 2017; Barrientos, 2008; 2013). MS derives from a set of exploitative

human (labour) practices, arrangements, and relationships. This leads to considering both structural and relational causes that underline situations and practice of labour exploitation and MS in business (LeBaron and Rühmkorf, 2017; LeBaron, 2018), which are the subject of discussion in the upcoming chapter.

1.3.2 Modern Slavery Legislation

On an international stage, in addition to regulations against HT (UN, 2000) and forced labour (ILO, 2017), several states have enacted legislation to increase transparency in supply chains and eliminate MS. International regulatory efforts to address MS vary between different countries and even within countries. In the United States, for example, California introduced the Transparency in Supply Chains Act (TiSC) in 2010 which requires 'retail sellers and manufacturers doing business in the state to disclose their efforts to eradicate slavery and human trafficking from their direct supply chains' (Crane, 2013, p.65). In 2017, France adopted the Duty of Vigilance civil liability law where large companies have to implement a plan to identify and prevent human rights and environmental risks resulting from activities controlled or significantly influenced either by the focal corporation, related corporations, subcontractors, or suppliers (Cossart et al., 2017). Australia introduced its own legislation against MS in 2018, and in 2020 the Netherlands developed Transparency and Mandatory Due Diligence Laws (BHRRC, 2021). It is important to note that while the UK MSA, the Australian MSA, and the California TiSC legislation target MS and HT specifically, the other are broader and focus on human rights or child labour.

In 2015, the UK passed the Modern Slavery Act (MSA), which includes a corporate reporting requirement, aimed at increasing transparency around MS in the operations and supply chains of large companies (HM Government, 2015; Nolan and Bott, 2018; Stevenson and Cole, 2018; Wen, 2016; Broad and Turnbull, 2018). Since then, the numbers of reported victims recorded by the National Crime Agency (NCA) has gradually increased (NCA, 2018), although it is unclear whether this is due to more individuals being exploited or better detection. Other legal frameworks in the UK linked to MS and HT include: the Gangmasters (Licensing) Act of 2004 and the European Convention on Human Rights 2010 introduced by the UK Parliament; the Human Trafficking and Exploitation Act 2015 and the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act 2015 passed by the devolved Scottish Parliament and the Northern Irish Assembly respectively (HM Government, 2022).

Section 54 of the UK MSA requires commercial organisations with a turnover of £36 million or more, who conduct (part of) their business in the UK to prepare an annual Modern Slavery Statements (MSS) outlining the steps that they may have taken to ensure that MS is not present in their operations or in any of their supply chains, and to publish information on the company's website. It does not, however, prescribe the form, content, or level of detail of the statement. If the company has not taken any such steps, it must issue a statement to that effect (Nolan and Bott, 2018; HM Government, 2015).

The UK MSA is supplemented by the TiSC Guidance (HM Government, 2017; 2021), which also encourages businesses outside the scope of the provision to report voluntarily. Although the MSA may appear to only be relevant to large organisations operating in the UK, this number increases exponentially when partners and small and medium sized enterprises supplying these organisations are considered (Stevenson and Cole, 2018). The UK

Government does not prescribe what an appropriate response to MS looks like (Stevenson and Cole, 2018; BHRRC, 2019); however, it has stipulated that the MSS must set out the steps the organisation has taken during the financial year to ensure that MS and HT is not taking place in its business or supply chains, or that the organisation is taking no such steps (HM Government, 2015).

Neither the MSA nor the subsequent TiSC Guidance (HM Government, 2017; 2021) dictates the details of the information that commercial organisations must disclose. This leaves discretion to businesses to explain their policies and practices in ways suited to their own business circumstances (Wen, 2016). This means there are no clear requirements for what must be included and failure to report does not lead to legal or financial penalties, an aspect of continued criticism in scholarship and practice (BHRRC, 2019; Nolan and Bott, 2018; Stevenson and Cole, 2018; Wen, 2016). This leads to ongoing debates concerning the ability of the MSA to change corporate practice without mandatory reporting or holding companies accountable. Wen (2016) advocates that mandatory disclosure would serve as an important and viable means of deterring undesirable business conduct and increasing accountability.

The MSA is the first national legislation to use the term MS and to explicitly target MS as opposed to HT, forced labour, or other forms of exploitation (Broad and Turnbull, 2018). According to Broad and Turnbull (2018), the MSA plays a crucial role in constructing MS as a structural problem with implications for businesses, as much as it aims to solve it. However, critics suggest that the legislation constitutes a partial solution to the various problems brought under the MS umbrella. This means MS remains a complex issue for businesses, with more work necessary to address the unintended consequences of the policy and implementation difficulties. In addressing the complexity of MS, scholarship and MS experts suggest enhancing multi-agency working, which has been highlighted as crucial in relation to information sharing and the coordination of compliance and prevention action (Broad and Turnbull, 2018; Nolan and Bott, 2018; Stevenson and Cole, 2018).

1.3.3 Prevention, Protection, Prosecution, and the 'fourth P'

Prevention, protection, prosecution, and partnership is a four-level approach developed from the Palermo Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children supplementing the United Nations Convention against Transnational Organised Crime (UN, 2000). The United Nations (UN) initially advocated a three-level approach to address and eliminate MS and HT consisting of prevention, protection and prosecution, to which the partnership element was added in 2009 (UN, 2009; Sheldon-Sherman, 2012). The four elements (discussed below) are often interconnected by MS scholarship, law enforcement agencies, and NGOs (Bales, et al. 2015; Brunovskis and Surtees, 2019; Blackburn et al, 2011; Landau and Marshall, 2018). The literature on MS in business is generally focused on prevention or prosecution, exploring supply chains, and more recently business responses to MS (Crane et al., 2021; Antonini, Beck and Larrinaga, 2020; Locke and Samel, 2018; Anner and Dutta, 2019; Sarfaty, 2020). Victim protection has received scant attention while partnership development against MS remains largely unexplored in a business context.

Scholars in the field agree that *prevention* is a critical component in addressing MS (Bales, et al. 2015; Crane et al, 2018; Dean and Marshall, 2020). Broadly speaking, preventative efforts

seek to increase knowledge of MS through public awareness campaigns that inform and educate communities about the exploitative forms under MS and HT to enable victim identification and warn vulnerable populations (Bales, 2007; Brunovskis and Surtees, 2019). At a more structural level, prevention also refers to rectifying laws that omit categories of workers from labour law protection, providing robust labour enforcement, particularly in vulnerable sectors where exploitation is typically found (Brunovskis and Surtees, 2015; Crane et al, 2018). Over the years, several different prevention measures have been directed at populations deemed at high-risk of exploitation. Brunovskis and Surtees (2019) advocate for constructing labour recruitment programmes that ensure protection of workers from exploitation, while emphasising effective policy implementation with stronger enforcement, better reporting, and monitoring supply chains.

Victim protection, often overlapping with identification, is of paramount importance in tackling MS and often seen as a form of prevention. It starts with proactively identifying victims and training first responders (Landau and Marshall, 2018). Victim protection efforts include prioritising the rights and needs of victims and providing a roadmap that goes beyond the initial rescue, restores survivors' dignity, and provides an opportunity for productive lives (Landau and Marshall, 2018; Anderson and Linden, 2005). *Prosecution* has been the most challenging level in addressing MS and HT. A stark disparity is identified by researchers between the global extent of MS and the concerning low number of convictions (Smit, 2011). Law enforcement agencies are facing difficulties in identifying victims and challenges in prosecution, due to the hidden nature of the crime, victims being scared to report the crimes or testify, and the different legislative systems across states (Moser, 2012), but also partly due to the lack of detailed definitions for the distinct types of exploitation (Crane, 2013; Christ and Burritt, 2018; Smit, 2011). Prosecution is increasingly associated with victim protection, since evidence supplied by protected victims may increase perpetrator prosecutions (Dowling et al, 2007).

The *partnership* element added in 2009 is proposed as a solution to addressing MS because it augments efforts by bringing together diverse experience, amplifying messages, and leveraging resources (UN, 2009; Sheldon-Sherman, 2012). Partnership has many definitions and applications across disciplines. It is broadly understood as an affiliation, association, collaboration, synergy, liaison, or relationship between two or more entities (McQuaid, 2000; Roth, 1996). Partnerships are defined as purposive strategic relationships between independent firms who share compatible goals, strive for mutual benefit, and acknowledge a high level of mutual interdependence (Mohr and Spekman 1994; Hatton and Schroeder, 2007; Wilson, 1996). Organisations or entities engage in partnerships for the purpose of achieving goals that individually could not easily be attained. Partnership research and theoretical framing is used in multidisciplinary studies on crime prevention, urban regeneration, and economic development to explore how organisations develop compatible goals and strive for mutual benefits. In a business context partnerships are studied to gain competitive advantages in the marketplace and assess the profitability of organisations (Powell, 1987; Mohr and Spekman, 1994).

In a MS context the aim of partnerships is to share information across schools, communities, local businesses, and particularly with vulnerable people who may have limited access to information (Bales, 2007; Brunovskis and Surtees, 2019; Cockayne, 2015); to raise awareness of the threats of MS and empower stakeholders to identify and report cases of exploitation (Landau and Marshall, 2018); to gather intelligence that enabled law enforcement

to prosecute criminals; to address threats of MS and cross-border implications (Cockayne, 2015). Partnerships allow key players to share information about the nature and scale of MS and exchange good practice, thereby filling any gaps in knowledge or skills that might not otherwise exist. This means that partnerships can focus on prevention, protection and/or prosecution of MS and HT. This research focuses on partnerships that *address* MS, therefore partnerships aimed at prevention, protection, and prosecution are within the scope of the study.

Partnership is becoming increasingly important within strategies to address MS (GLAA, 2020; Nottingham Rights Lab, 2018a; IASC, 2020). Although research on partnerships to address MS is still an emerging area, other streams of research focusing on MS in business recognise its significance. Blackburn et al, (2011) advocate for a 'coordinated response' by government, law enforcement, medical service providers, and others to contribute to meaningful systemic change in hopes of preventing future trafficking and exploitation of vulnerable populations. 'Cooperative action' is advised to ensure the protection of victims by providing them with treatment, both medical and psychological, as well as educational or vocational training to stem the chance that they will return to the exploitative circumstances, which is oftentimes the only thing they know (Blackburn et al, 2010; Landau and Marshall, 2018).

In practice, partnerships are beginning to emerge as a practical strategy seeking to prevent forced labour and labour abuse in the construction, agriculture, retail and apparel sectors where complex supply chains intersect with reliance on temporary and seasonal migrant labour that create conditions for exploitation (Phung and Crane, 2018; Richards, 2004). The UK Government increasingly prioritises 'anti-slavery partnerships' and several multi-agency partnerships, chaired and coordinated by law enforcement, have been created across the UK to address MS (Dowling et al, 2013; Van Dyke, 2017; Gardner, 2018). Existing efforts in the shape of multi-agency partnerships engage both statutory and non-statutory actors and are strategic, playing a role in developing or coordinating service delivery, rather than being solely consultative or focused on fundraising. Other extant partnerships have been developed by the UK Government in partnership with scholars and NGOs to facilitate prevention, protection, and prosecution. Initiatives include: regional partnerships between the Independent Anti-Slavery Commissioner (IASC) and local authorities; task forces among law enforcement agencies that cooperate to share intelligence, work across jurisdictions, and coordinate across borders; Collaboration between local authorities, law enforcement, and associations (NGOs, MS consultants, and faith based organisations) that seek to craft protocols to establish compliance mechanisms for slavery-free supply chains (EU, 2011; Dowling et al, 2013; Nottingham Rights Lab, 2018b).

There is a need to study these partnerships because even though they are increasingly seen as a potential solution to address the complexity of MS, details surrounding the form partnerships should take, the roles and contribution of partners, or how they might best identify and deliver shared goals remain underexplored areas in MS and partnership scholarship. This is particularly the case for collaborations that include businesses especially in the event sector.

1.3.4 Industry Context

The UK events industry, also referred to as the event sector, is a particularly important area of interest in connection to MS, not only because of the number of businesses operating in 3D

conditions and the number of people it employs (Dowson and Bassett, 2015), but also because of human and labour rights issues identified and discussed in the following chapter. The event sector is a vast industry with complex supply chains. The sector includes event organisers, venues, destination management organisations (DMOs), exhibition contractors, event production companies (Getz and Page, 2016; Getz and Andersson, 2010; Getz and Brewster, 2009; Eventbrite, 2018; Events Industry Board, 2018). Additionally, a plethora of suppliers form the supply chain of the events industry (Quinn, 2013) including transport operators, telecommunications and IT companies, interpreters and translators, construction companies, textile and garments producers, restaurants and catering services, event insurance specialists, many of which are deemed high-risk sectors (Smit, 2011; Crane, 2013). In addition, the supply chain of events (construction, textile and garments, restaurants and catering services) has been identified by the ILO and Gangmasters and Labour Abuse Authority (GLAA) as industries at risk due to highly exploitative labour practices (ILO, 2017; Quinn, 2013; Smit, 2011). Prior to the Covid-19 outbreak, the sector sustained between 530,000 and 570,000 full-time equivalent jobs (Business Visits and Events Partnership, 2010; Eventbrite, 2018), with 15,500 working in business events such as conferences, events, and exhibitions (Abson, 2017). Pre-pandemic figures estimated the sector worth at £42.3 billion in terms of direct revenue generated by event delegates, attendees, and organisers, (Business Visits and Events Partnership, 2010; Eventbrite, 2018). A substantially higher figure is achieved once the wider economic impacts (worth an additional £7.7 billion) are included: indirect and induced spend, which includes incurred costs of transportation, accommodation, food and beverage, and the spend by those accompanying attendees at business events (Events Industry Board, 2018; Abson, 2017). The top ten leading event agencies in the UK have a combined turnover of more than £3.5 billion, although a substantial part of it is generated outside the UK (Events Industry Board, 2018) while the vast extent of events companies operating in the UK are small and medium-sized enterprises (SMEs) (Dowson and Bassett, 2015).

To date, events studies have primarily focused on issues concerning sustainability, safety, and socio-cultural impacts of mega-events, sport events, and festivals. Recent studies explore human and labour rights issues (Janta et al, 2011; Ndiuini and Baum, 2021) and sexual exploitation of women and children in the niche subsector of sports mega-events (Draper, Young, and Fenich, 2018; Matheson and Finkel, 2013). However, MS and issues concerning labour exploitation, bonded labour, and human trafficking in the vast proportion of the event sector (namely: business events, festivals and cultural events) remain largely understudied (Getz and Page, 2016; Getz and Brewster, 2009; Matheson and Finkel, 2013). In addition to this, events are seen as significant opportunities for destinations in the UK to promote themselves and improve place image, which leads to an increase in event and festival management (Getz, 2016; Kim, 2018). Events provide significant socio-economic benefits, and interest in hosting events and festivals has increased. With this growth comes increased risk of exposure to MS (Getz and Page, 2016b; Kim and Kaewnuch, 2018).

Recent research on both sexual and labour exploitation in the related field of hospitality suggests that the events industry faces similar risks because of its shared characteristics, trends and customers; similar to hospitality, events companies are often unable to directly employ staff due to the seasonal and transitory nature of events (Getz and Page, 2016). This causes reliance on migrant workers and agency staff which provides opportunities for labour exploitation (Paraskevas and Brookes, 2018a). The hospitality sector has been identified as a

particularly important area of interest in connection to trafficking, forced labour and child labour by scholars and practitioners (Paraskevas and Brookes, 2018a). Evidence from the National Crime Agency (NCA) and GLAA shows that people exploited in the hospitality sector, and other industries reliant on outsourced labour, are victims of forced labour, debt bondage, health and safety concerns and physical and mental mistreatment. The event sector is dependent on seasonal labour and dominated by migrant workers, male and female, usually below the age of 45, including minors, who face language barriers. Victims are predominantly recruited and trafficked from Eastern Europe and South-East Asian countries using digital recruitment channels (GLAA, 2020). Cases of labour exploitation and abuse in the hospitality and events are associated with withheld payments, excessive working hours (sometimes more than 14 hours a day, six or seven days a week (Nolan and Bott, 2018; GLAA, 2019), and poor, crowded, and unsafe accommodation.

A systematic review of extant academic literature (presented in the next chapter) shows that events studies focus primarily on socio-cultural and environmental impacts of sporting events and festivals, thus many areas within the industry, including business events which account for over 80% of the UK industry (Draper et al, 2018; Eventbrite, 2018), remain overlooked (Draper et al, 2018; Mair and Whitford, 2013; Kim and Kaewnuch, 2018). Furthermore, like many other UK and global industries, research on MS in the field of events focuses primarily on sexual exploitation. Notwithstanding the importance of examining sexual exploitation, this study seeks to examine all types of exploitation resulting from MS due to evidence pointing to a higher number of victims of labour exploitation (NCA, 2018).

1.3.5 A note about the researcher

Identity, empathy, and reflexivity

Reflexivity and the belief that that meaning is social, arising from interactions, and constructed by individuals as they engage with the world they are interpreting (Creswell, 2018; Crotty, 1998) have led me to designing this research as a qualitative study (Czarniawska, 2004; Riessman 2002). Therefore, I include this brief note in the context of this thesis to reflect on my identity, my professional, and academic background which shape my assumptions and beliefs and influence both the choice of topic for this research and my approach to engaging and interpreting stakeholders' experiences. The aim of this subsection is to understand the dynamic between myself and the research participants and to acknowledge that my assumptions and beliefs conform to broader ways of thinking and aligning to some of my research participants (Riessman, 2002; Creswell, 2018; Czarniawska, 2004). In line with subjectivist beliefs, I openly acknowledge, actively reflect on, and question my own values throughout the research process (Creswell, 2018; Czarniawska, 2004). Hence the reason that this thesis is largely written in the first person. Consistent with the constructivist ontology and interpretivist epistemology underpinning this study, I recognise that my own background influences my choice of approach and methods (Cassell, Radcliffe and Malik, 2020; Crotty 1998). As someone who studied linguistics for their undergraduate degree, who enjoys reading and writing, learning about people's lived experiences, and making up-close observations, I gravitate to qualitative narrative inquiry.

My personal training and experiences also shape my understanding and interpretation of the phenomenon (Creswell, 2018). Although my professional and academic background is in

tourism, hospitality, and events (having work experience in corporate events and a postgraduate degree in the subject) I realise during this research that my understanding of the sector is skewed to my own lived experiences and lacked fundamental understanding of leadership and corporate motivation. I examine reflexively how my position changes along the research process. I started this study thinking that event sector stakeholders would embrace the opportunity to engage in research and contribute to understanding preventive and partnership approaches to MS risks pertaining to their organisations and suppliers. I began to question this assumption as I engaged with scholarship on MS in business, and more so when I began to encounter difficulties to recruit events professionals to engage in this study (detailed in the Methodology Chapter). My understanding of the sector continued to develop as I engaged with key actors during interviews and grasped the challenges posed by this complex issue.

As a migrant to the UK, navigating the confusing and costly immigration process of work and residency permits, settled status, and naturalisation, I have understanding and empathy for those facing additional language and visa barriers in securing employment. This has impacted my beliefs on the implications of MS in business. Although the range of exploitative and poor labour conditions do not equate to MS (Skirankova, 2011; Tallmadge and Gitter, 2017; Barrientos, 2008; 2013) it can render people vulnerable to it. This leads me to considering structural and relational causes that underline situations and practice of labour exploitation and MS in business (LeBaron, 2018). My views also align with those of research participants and MS practitioners who view partnership as a much-needed solution to address the implications of MS in the event sector and in business more broadly.

1.4 Thesis Structure

This thesis is structured into ten chapters, as follows: **Chapter 2. MS in Business and Events** explores scholarship on MS in business environments and the mechanisms to address it with a particular focus on the event sector. This is important as it allows me to contextualise the scope of this research focusing on how this complex issue is perceived by multiple actors and to identify further gaps in business and MS scholarship. **Chapter 3. Partnership research and theoretical framing** explores scholarship on partnerships that address complex issues. I draw on different disciplinary perspectives from business, organisational studies, and public policy to explore and theorise partnership approaches to addressing MS and stakeholder engagement in business and events. I critically evaluate the relevance of Stakeholder and Partnership Theories to the research phenomenon and develop a *Conceptual Framework* through which I analyse stakeholders' perspectives and responses to MS in the upcoming chapters.

Chapter 4. Methodology outlines the methodology used to interpret documents and stakeholder interviews. The research is designed as a constructivist qualitative study (Yanow, 2015). Through a constructivist ontology and interpretivist epistemology, this project seeks to understand participants' meaning making within the context of MS in the field of events. I use a narrative approach to study collective reporting and individual experience of engaging in partnership to address MS in the British event sector. This approach allows me to explore the socially constructed nature of the phenomenon where stories and language play a role in the ways individuals and companies construct reality (Plummer, 1995; Czarniawska, 2004). Within the narrative approach, I use the Labovian model of narrative analysis as a technique to

interpret the primary data collected from event companies and elicited during interviews (Andrews et al, 2000; Riessman 2002; Czarniawska, 2004). This methodology enables me to gain an in-depth understanding of the complex actions taken by stakeholders in addressing MS in the UK event sector, through the review of primary data sources.

Chapter 5. Risk and People focused Narratives presents the document analysis and findings based on *the event-centred Labovian model of narrative analysis*. In this chapter, I present the analysis process and the findings resulting from the analysis of Modern Slavery Statements produced by events organisations and suppliers. Findings lead me to map the key stakeholders and organisational function areas engaged in MS prevention in line with the research objective leading to the two narratives focused on *risks* and *people*; evidence of partnership is presented and underlines the implications for partnership development. In line with the abductive approach, findings allow me to refine the Conceptual Framework which I later use in the interpretation of interviews.

The following three chapters: **Chapter 6. Compliance Narrative**, **Chapter 7. Collaboration Narrative**, and **Chapter 8. Action Narrative**, present participants' experiences and perspectives about MS resulting from stakeholder interviews based on *the experience-centred Labovian model of narrative analysis*. The three narratives offer nuanced (and at times conflicting) interpretations of what MS is, where and how it can occur, and its implications for the event sector. The narratives illustrate the way in which different categories of stakeholders from different organisations perceive MS risks in the industry and how this informs their rationale for action. The three chapters offer insights into the experiences of stakeholders and allow me to review the adequacy of partnerships as a mechanism for addressing MS.

Chapter 9. Discussion. In line with the research aim, I discuss the implications and role of partnership based on distinct interpretations and approaches. Findings indicate distinct perspectives on the role partnerships can play in addressing MS. These differences stem from stakeholders' meaning making of MS and their views on where MS responsibility lies leading to distinct approaches to partnership, while responsibility remains a disputed area across. I argue the need for a *Partnership Continuum* to support the development of collaborations and interventions that enable event sector organisations to engage with clients, suppliers, peers, and external actors in addressing MS.

Chapter 10. In the **Conclusion** chapter, I summarise the key findings emerging from the Labovian model of narrative analysis with regards to the research aim and objectives. I present the academic, methodological, and practical contributions to knowledge which include recommendations for policy makers, industry stakeholders, and NGOs; finally, I discuss the limitations of the study and suggest future directions of research on MS in business and partnership development.

2 Modern Slavery in Business and Events

2.1 Introduction

This chapter explores current debates on MS in business contexts and the mechanisms to address it with a particular focus on the event sector. While there is a lack of research specific to MS in the event sector, this literature explores studies on MS in business and MS in hospitality and tourism (Stevenson and Cole, 2018; Paraskevas and Brookes, 2018b; Abson, 2017) to identify shared risks of sexual and labour exploitation in event organisations and their supply chains (Lusby et al. 2015; Schofield, Rhind and Blair, 2018; Pettman, 2010; GLAA, 2022). This chapter contextualises the scope of this research by focusing on how this complex issue is perceived by multiple stakeholders and identifies further gaps in business and MS scholarship.

2.2 Modern Slavery in Business

Over the last decade, with the introduction of legal frameworks around the globe to address exploitative practices (Nolan and Bott, 2018; Stevenson and Cole, 2018; Cossart, et al, 2017; HM Government, 2015; Wen, 2016; Broad and Turnbull, 2018), MS has received increased attention in scholarship, practice, and media. Yet, the underlying issues of MS in business remain poorly understood. The same applies to human trafficking (HT) which is often defined as a form of MS. As noted in the previous chapter, these issues arise largely from ambiguous definitions (Bunting and Quirk, 2017) leading to the conflation of legal concepts (Sarfaty, 2020). Building on the definitions of MS and HT, this section reviews the literature on MS in business. I start by exploring implications of MS risks and how these are interpreted in a business context by looking at scholarship on translation; I then explore empirical evidence on MS in supply chains considering the legal and regulatory perspective as well as businesses' responses to regulations.

2.2.1 Modern Slavery: strict equivalence or sufficient similarity

This study follows the legal definition from Bellagio-Harvard Guidelines according to which a person is a victim of MS if they are deprived of their individual liberty, with the intent of exploitation through the use, management, purchase, sale, profit, transfer or disposal of that person (Allain, 2012). In a business context, MS represents an extreme on a continuum between exploitative practices and poor labour conditions (Skirankova, 2011; Tallmadge and Gitter, 2017; Barrientos, 2008; 2013). Yet, in popular discourse, MS is frequently framed in terms of poor working conditions in developing countries. The portrayal of MS in the media complicates matters further especially when invoked for 'sensationalist iconography' (Sarfaty, 2020) to equate specific issues with the most severe form of exploitation imaginable. The inconsistent use of MS terminology in legislation, scholarship, and practice and the rhetorical force behind it has led to multiple labour and human rights issues to be strategically labelled as MS. The aim of this strategy is to draw political support, public awareness, and institutional investment (Sarfaty, 2020) to practices in the UK and across the globe (Caruana, Crane et al. 2021). However, the misuse of terminology receives criticism from MS scholars and NGOs (Lewis et al, 2015) as it leads to questions about what practices really constitute MS for those accustomed to thinking of MS as a historical practice (Sarfaty, 2020; Cockbain et al, 2018; Quirk, 2007).

In MS scholarship, the use of terminology has been receiving increased attention, especially in studies on MS and human rights in business. Phung and Crane (2018) and Quirk (2007) distinguish the relationship between MS and the array of issues behind it as ranging between *strict equivalence* and *sufficient similarity*. Strict equivalence maintains that practices should only be equated with MS in cases of close correspondence. This means that similarities exist between MS and other labour or human rights issues but insists that they should not be confused with MS (Weitzer, 2014; Phung and Crane, 2018). The sufficient similarity model situates other forms of human or labour rights infringement alongside MS on the basis of 'familial' resemblance (Quirk, 2007). This leads to an ongoing debate arguing between the 'hard end and soft end' of MS (ILO, 2008; Skrivankova, 2010).

Literature exploring the relationship between business and MS related practices (Christ and Burritt, 2018; Dowling et al., 2007) reveal labour exploitation to be prevalent in many business models (Crane, 2013; LeBaron, 2014; Christ and Burritt, 2018; Smit, 2011). Labour exploitation (including criminal exploitation) is currently the most common type of exploitation reported in the UK (GLAA, 2022; Cottone and Gardner, 2019; NCA, 2022; Phung and Crane, 2018). In a business context, coercion is used to extract labour from workers who experience restrictions to their rights to freedom of movement leading to forced labour (Stevenson and Cole, 2018), or who incur debts having to pay recruitment fees, visa, and sponsorship to migrate for work to another country which entraps them in debt bondage (Smit, 2011; Crane, 2013). Dowling et al. (2007) and Crane (2013) talk about MS as a management practice and the use of labour exploitation in the workplace. They exclude issues such as forced marriage and domestic servitude which relate to the domestic environment. The same view is later adopted by Phung and Crane (2018) and Christ and Burritt (2018) who exclude any forms of exploitation which are not related to the workplace such as child soldiers, organ harvesting, and prison labour. Furthermore, recent studies looking at the relationship between MS and business limit the analysis to MS in private rather than public organisations, since the former account for over 80 percent of all labour exploitation (Crane, 2013; Dowling, 2007; LeBaron, 2014; Christ and Burritt, 2018).

To illustrate the types of exploitation that fall under MS (which may or may not be the result of HT), the diagram below is developed based on UK legislation, the Bellagio-Harvard Guidelines, international scholarship, and definitions adopted by practitioners in the field (Bales, et al. 2015; Quirk, 2006; Cockbain et al, 2018; Phung and Crane, 2018; ILO, 2008; Skrivankova, 2010; Crane, 2013; LeBaron, 2014; Christ and Burritt, 2018; Smit, 2011). Evidence from research conducted by Christ and Burritt (2018), Craig et al (2019), Phung and Crane (2018), Dowling et al. (2007), Stevenson and Cole (2018) shows that labour exploitation is the crime that is most applicable to modern businesses, while (Matheson and Finkel, 2013; Adams and Piekarz, 2015; Finkel and Finkel, 2015) have found a connection between the event sector and an increase in sexual exploitation; consequently, the specific types of exploitation highlighted in green are the focus of this research:

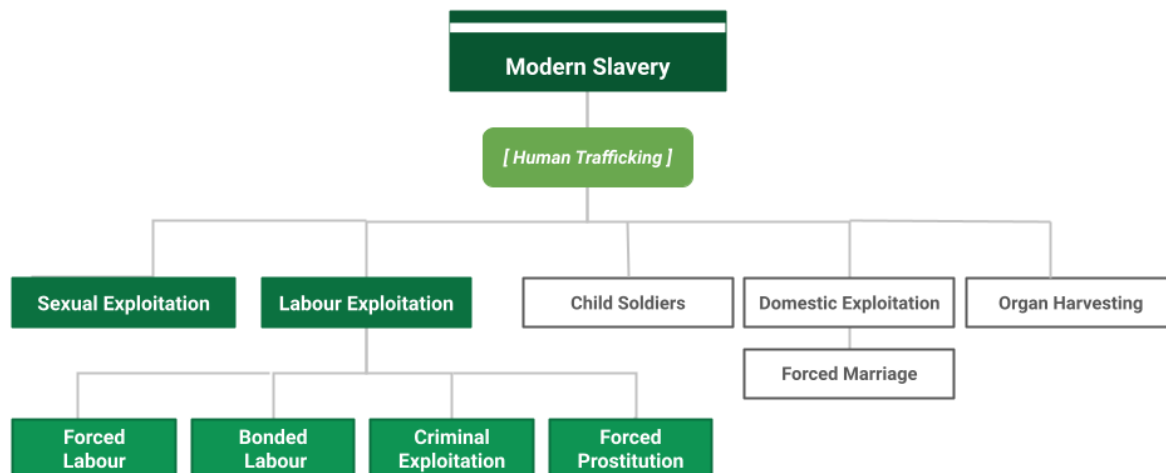


Figure 2.1. Types of exploitation associated with businesses

Clearly distinguishing MS practices is fundamental not only to identify victims and prosecute criminals, but also to enable collaborations and establish preventive practices (New, 2015; Ollus, 2015; Cockbain et al, 2018), hence the calls for research to explore MS in different industries and their specific supply chains (Bales, et al. 2015; Weitzer, 2014). Researchers have attempted to identify specific exploitative practices by comparing the lived experiences of MS victims to those of migrants in poor working conditions (Weitzer, 2014; Phung and Crane, 2018); their findings show a broad scale of relationships from highly coercive and exploitative to cooperative, consensual, and mutually beneficial between migrants and their employers, with more complex grey areas in between the two poles (Nolan and Bott, 2018; Phung and Crane, 2018). The complexity of those so-called ‘grey areas’ pose challenges for MS practitioners and researchers alike. Some are relatives, friends, or associates who recruit workers and facilitate migration, individuals who have a very different relationship with migrants than those who use force or deception or engage in serious and systematic abuses (Weitzer, 2014).

Due to the complexity of exploitative practices, a ‘voluntary’ element related to victim recruitment, and the range of relationships between victims and recruiters, identifying cases of exploitation poses increased difficulty, as does victim support and prosecuting criminals (Phung and Crane, 2018; Ollus, 2015; Skrivankova, 2010). This has been another argument behind the debate on the hard end and soft end of MS. The challenge in discussing MS, specifically labour exploitation, may exist because it is often connected with general concerns about working conditions (New, 2015) and with the idea that all workers in industrial capitalism are ‘wage slaves’ (Phung and Crane, 2018). Crane (2013; 2018) explains labour exploitation by looking at under-pricing of goods and labour through illegitimate means. Under-pricing labour services is very common in the event sector. It is usually done through a combination of outsourcing staff to agencies and a high reliance on volunteer and migrant workers (Schofield et al, 2018; Baum, 2015; Adams and Piekarz, 2015). Although not illegitimate means, both practices increase the risks of MS (Baum and Lockstone, 2007; Ingerson, 2002). Furthermore, Crane (2013) has identified the conditions in which MS is likely to emerge. They include smaller business models with limited ability to capture value; a high reliance and recruitment of disadvantaged populations, and supply chains with geographic isolation (Crane, 2018; New, 2015). The event sector is characterised by many of these conditions: a vast

number of events are organised by small organisations that are often unable to directly employ staff due to the seasonal and transitory nature of events (Getz and Page, 2016), causing reliance on migrant workers and agency staff which provides opportunities for labour exploitation (Paraskevas and Brookes, 2018a; Paraskevas and Brookes, 2018b).

Unlike human trafficking, forced labour, and child labour, MS is not a legal standard. This means that the interpretation of MS and the determination of whether MS is taking place in business is thus left to private actors, often guided by third parties and service providers such as NGOs, auditors, and consultants (Sarfaty, 2020). Seeking to explain MS in a management context, new research explores how the meaning of MS (Sarfaty, 2020) and human rights (McVey, Ferguson and Puyou, 2022; Goethals, 2019; O'Kelly, 2019) are understood and addressed in business through the 'chain of translation'. Findings indicate that MS and human rights language and terminology are translated when brought into a corporate space by framing them in familiar business terms to make them more easily adopted (O'Kelly, 2019; Merry and Levitt, 2019). Translation entails abandoning explicit language and terminology linked to MS and exploitation and using more general, neutral language employed in Corporate Social Responsibility (CSR) and Human Resource Management (HRM) such as risks, fairness, or equality (O'Kelly, 2019). While the rhetoric of 'respect for human rights' is reproduced in a business context as adherence to regulatory standards and codes of conduct consistent with CSR discourse.

Translating MS and human rights into the corporate context poses further challenges for business actors (Merry, 2015; Scheper, 2015; McVey et al., 2022). Research found that business actors, NGOs, auditors, and service providers encounter a 'resonance dilemma' when translating specific language and terminology of MS and human rights into the corporate context (O'Kelly, 2019; Scheper, 2015) because language, ideas, and practice need to resonate with existing value systems in order to be accepted (Merry and Levitt, 2019). In managing this dilemma, actors turn to strategies to ensure human rights are understandable and palatable (McVey et al., 2022). Scholarship cautions that the translation process renders MS and human rights into 'manageable objects', rather than transforming business practices (O'Kelly, 2019; McVey et al., 2022; Merry and Levitt, 2019). By using metrics, indicators, and frameworks to translate the language of exploitation and rights into a technical and rational language of CSR and HRM (Merry, 2015; Scheper 2015) MS and human rights become neutralised (Merry and Levitt, 2019) and diluted (McVey et al., 2022).

The lack of a clear definition of MS and use of unspecific language leads to debates surrounding which types of exploitation can occur in business and what constitutes MS risk, but also to disagreement over the best approaches to address it (Sarfaty, 2020). Research indicates that organisations encounter difficulties in identifying risks of MS related to the hidden nature of crime (Bales, et al. 2015), or its lack of observability (Crane, 2013) but also due to the practical means or procedures used to map risks, their level of experience, and knowledge (Sarfaty, 2020). Moreover, assessing and measuring the risks of MS, labour, and human rights violations poses challenges given the complexity of exploitative practices that can take many forms and depend on the existence of multiple factors of exploitation (Phung and Crane, 2018; Quirk, 2007; Ollus, 2015). Once again, the translation process is employed by business actors to identify MS risks of exploitation, broadly referred to as risks (Scheper, 2015).

Through translation, in a business context the term risk is a familiar frame that suggests a simple means of denoting that labour and human rights are to be incorporated within familiar corporate accountability practice (O'Kelly, 2019) thus rendering the risks associated with MS as commercial or reputational risks, as social or ethical concerns. At the same time, human rights are framed as generic business risks in the same way that environmental, safety, and other social risks are. Translating MS into a management problem is largely based on quantitative metrics such as indicators and risk scorecards (Crane et al. 2021). Risk indicators are categorised as *definite*, *strong*, or *possible* (Sarfaty, 2020; SEDEX, 2017) although the terms *high-risk* or *low-risk* are also used to describe industries, businesses, and supply chain conditions (Bunting and Quirk 2017; Phung and Crane, 2018). According to Supplier Ethical Data Exchange (SEDEX, 2017) *definite indicators* of labour exploitation include coercive recruitment practises, undocumented migrant workers subjected to threats of deportation, and workers unable to leave employment due to debts owed to the employer. *Strong indicators* include worker contracts misrepresenting employment relationships, workers subjected to physically abusive or humiliating disciplinary measures, and controlled movements outside the workplace by agents of their employers. Finally, *possible indicators* include the presence of multiple labour providers and agents from recruitment to employment, lack of information or misinformation about terms of employment, and signs of either psychological or physical abuse. The means organisations use to identify risks are not fully understood, however, most known practices include auditing conducted internally or via third-party auditors and consultants. According to SEDEX (2017) auditors and consultants often lack the tools to discover instances of MS, HT, or forced labour (Sarfaty, 2020).

From a business perspective this leads to the distinction between *direct or operational risks* and *supply chain risks* (Scheper, 2015; LeBaron, 2014), with the latter receiving most attention in practice and scholarship (as seen in the next section of this chapter). Internal risks are less studied and generally framed in CSR discourses often invoking reputational risk mainly (Scheper 2015; Merry and Levitt, 2019). In identifying direct risks, it has been argued that geographic isolation and businesses operating for short periods of time increase the operational risks of MS (Crane, 2013; LeBaron, 2018). This raises concerns for one-off events but also for transitory events that change location from one occurrence to the next including mega-events, smaller scale sporting events, business, and corporate events (Dowson and Bassett, 2015; Quinn, 2013). As a result, event companies constantly need to find new suppliers and are unable to retain employees (Baum and Lockstone, 2007), which creates potential procurement and recruitment issues for all types of events. Furthermore, except for events planners and managers, who are generally offered permanent roles and are engaged in all event planning stages (Carlsen and Andersson, 2011), the type of jobs outsourced in the industry are short-term, entry level roles requiring low-skilled workers. Consequently, event companies are heavily reliant on agency workers for most of their staffing throughout the duration of an event (Baum and Lockstone, 2007; Ingerson, 2001).

More recently, scholars and MS practitioners have started to examine the role of technology both as a tool employed in prevention and a means to facilitate MS (Milivojevic, Moore, and Segrave, 2020; Christ and Helliard, 2021; ILO, 2017; GLAA, 2020). Technology is reportedly used in recruiting victims, facilitating sexual exploitation of children and adults, and in transferring and laundering money (Milivojevic et al, 2020). The growing use of digital recruitment channels makes protecting migrant workers' human and labour rights difficult and exposes them to high risks of labour exploitation. While technology has been explored in

connection to sex trafficking and child sexual exploitation, comparatively little is known about the role of technology the role of seemingly legitimate digital recruitment platforms in facilitating trafficking, forced labour, child labour, and debt bondage in a business context through digital recruitment platforms (ILO, 2017).

Accounts of false advertising in the form of legitimate job opportunities in agriculture and other seasonal sectors have infiltrated both the media and public spaces; however, many of the studies and reports indicate insufficient evidence of labour exploitation and are based on anecdotal evidence or speculations (Boyd et al, 2018; Milivojevic, et al, 2020). The Gangmasters and Labour Abuse Authority (GLAA) developed an industry profile which shows that many victims in events and other sectors are recruited using internet adverts and via social media, through friends, and family. In addition, an increasing number of labour providers rely on digital platforms to recruit and manage shifts and payments for seasonal workers (GLAA, 2020). Still comparatively little is known about the impact of technology on facilitating recruitment leading to labour exploitation (Christ and Helliard, 2021). In the upcoming section I review scholarship on risk of MS associated with supply chains and subcontracting goods and services.

2.2.2 Modern Slavery in Supply Chains

Labour exploitation and its connection with business has increasingly become the subject of scrutiny (Nolan and Bott, 2018) and this has encouraged closer examination of supply chains (LeBaron, 2014; Nolan and Bott, 2018). In an attempt to discuss and address MS in Business, practitioners, policy makers, and scholars focus overwhelmingly on the risks of MS and labour exploitation specifically in supply chains (Scheper, 2015; LeBaron, 2018), although most empirical studies focus primarily on South-East Asian supply chains (Smit et al, 2021). In recent years, a series of factory fires and building collapses that killed thousands of factory workers in South-East Asia has focused attention on abusive labour conditions in global supply chain factories, prompting calls for more stringent regulation (Toffel, Short and Ouellet, 2015).

However, the question of labour exploitation in supply chains has been the subject of long-term concern for human rights organisations (New, 2015), and for businesses engaging in human rights due diligence. Modern supply chains are noted to be vast, complex, and constantly changing (Smit et al 2021). Large companies tend to have many different tiers of suppliers with goods and services originating from overseas, upstream of the company (Stringer et al., 2016). While the lack of transparency in supply chain is one of the most common risks arising for companies undertaking human rights due diligence (Smit et al 2021; Sarfaty, 2020)

Scholarship generally agrees that in response to pressures to cut costs and maximise profits, the landscape of supply chains has evolved from a basic chain to a complex network arrangement in which MS can thrive (Allain, 2012; Phung and Crane, 2018; LeBaron, 2014). Phung and Crane (2018) recognise a key characteristic of MS in the supply chain is that it often occurs amongst subcontractors that are distanced from lead firms through multiple layers of subcontracting comprising small producers and intermediaries enforced by 'informal and untraceable subcontracting' (LeBaron, 2018). Their findings are reflected in Allain (2012) who found that distance created comfort and complacency not only within organisations, but also in the consumption of goods with problematic production chains. As supply chains involve

numerous tiers and actors, it is important to gain a better understanding of the role, composition and dynamics of multi-stakeholder partnerships to address MS in such complex organisations of labour (Allain, 2009; LeBaron, 2018).

Christ and Burritt (2018) argue that MS is more common in business organisations characterised by narrow profit margins, labour intensive activities, where the majority of value is captured by large companies downstream in the supply chain. Many of these characteristics have been identified in organisations operating in the sectors of hospitality and events (Paraskevas and Brookes, 2018b). As illustrated in the next section, the event sector is based on such a sub-contracting model, which in theory renders it a high-risk sector. Consequently, forced labour, debt bondage and contract slavery can be hard for supply chain managers to spot even if audits are carried out, as exploiters use commonly occurring business mechanisms such as loans or contracts, to hide exploitative practices (Gold et al., 2015).

Despite increasing evidence that subcontracting, and the way supply chains are organised, fuels exploitative labour practices, discussions on eradicating forced labour from supply chains are scarcely mentioned in the business models that promote subcontracting. Few scholars, policy makers, or even NGOs have questioned the dynamics of subcontracting, perhaps because there is no law against it (LeBaron, 2018). Gimenez and Tachizawa (2012) comment on the way in which organisations divide their efforts between two main approaches: assessing their suppliers and setting standards vs direct engagement. Sancha, Longoni and Giménez (2015) observe that, although supplier development activities in regard to social issues may have positive effects on suppliers' social performance, there may not be a corresponding financial payoff for the buying firm.

The debate on subcontracting becomes even more contentious in the context of outsourcing workers through the use of labour agencies. Crane et al (2018) advocate that agencies sometimes resort to illegal ways to capture value and creative ways to reduce labour costs and increase their margins. Their findings evidence that some agencies will minimise labour costs by outsourcing or subcontracting to other agencies with lower labour costs and much of this subcontracting is unauthorised and unregulated. These outsourced or subcontracted intermediaries serve as key partners to producers by offering lower cost workers via illegitimate channels (Crane et al, 2018) a common practice in the event sector, which, as discussed below, has not been previously researched. Although not all outsourcing and subcontracting necessarily involves forced labour, it has been persuasively demonstrated that subcontracting leads to lower labour standards and reduces rights for workers (Gold et al., 2015; LeBaron and Rühmkorf, 2017; LeBaron, 2018; Crane et al, 2018).

Substandard working conditions, though not constituting labour exploitation, can nonetheless overlap with certain exploitative practices. For instance, while many workers may not choose to work in dirty, dangerous, and difficult (3D) conditions, some migrants may perceive this as the only viable option (Dowling et al., 2007). To the extent that the perceived lack of viable alternatives can be manipulated by an employer or agent, substandard working conditions can be very much part of an exploitative and coercive situation (Anderson and Linden, 2005). All labour exploitation includes unacceptable working conditions, but not all such working conditions constitute labour exploitation (Dowling et al., 2007). Consequently, Phung and Crane (2018) speak about economic exploitation and specifically distinguish it from labour exploitation. For them, economic exploitation manifests through minimal to no wages, debt bondage, involuntary and automatic deductions for expenses, and exorbitant interest rates.

Evidence from the ILO (2011) suggests that a third of all labour exploitation is facilitated through labour providers or third-party agents, particularly where debt bondage and trafficking are involved (Barrientos, 2013). According to Gallagher and O'Leary (2007) and Crane, et al. (2018) the UK has the largest agency sector in Europe, as well as one of the most fragmented, with a significant proportion of small, local operators supplying mainly low-status workers (Gold et al., 2015; Balch and Scott 2011). The considerable amount of temporary, casual, and other forms of contingent labour is supplied and often outsourced to third party labour providers (Crane et al, 2018). Migrant workers are predominantly engaged from Eastern European and Asian countries through an array of subcontracting channels and agents, facilitated by digital recruitment platforms. Dowling (2007) further emphasises that the industries where agency workers are most encountered typically involve low pay and low skill levels, requiring large numbers of flexible, seasonal workers, and most importantly, are dominated by migrant workers.

Lewis et al, (2015: 583) argue that London's economy is 'dependent upon the labour power of low-paid workers from across the world' for low skill jobs such as cleaning, home care, construction, and restaurant workers (cooks, waiters, bartenders). They demonstrate that migrants are engaged through a bewildering array of subcontracting chains and agents, which makes protecting their basic human and labour rights difficult, and that these combine to result in treatment of workers that can amount to labour exploitation. As they demonstrate, jobs in these sectors are highly related to time and place, and therefore insecure and flexible, making migrant workers 'desirable' as they may be more willing than relatively fixed 'local' workers to move within the UK for short-term employment (Lewis et al, 2015)

In the operations of hospitality businesses, researchers found significant risks of labour exploitation in procurement and employment practices (Baum, 2015; Paraskevas and Brookes, 2018b). Paraskevas and Brookes (2018b) identified most issues revolved around vetting agencies, audits of first tier suppliers such as food and linen and construction companies which represent a significant part of the supply chain of events. In addition, background checks of newly recruited employees and the financial administration of payments made to agencies, suppliers, and employees, were also identified as a factor increasing risks of labour exploitation (Smit, 2011; ILO, 2011).

The literature on MS and labour exploitation in business focuses primarily on the risks of MS in supply chain (Scheper, 2015; LeBaron and Rühmkorf, 2017). Although this focus is justified by uncovered cases of labour exploitation in supply chains in South-East Asia and by the complex and unregulated supply chains it leads to two issues; firstly, direct or operational risks are often underexplored as are domestic supply chains (Scheper, 2015; LeBaron, 2014). This leads to a lack of clarity and lack of evidence over exploitative practices in business direct operation and their domestic supply chains; secondly, it promotes the portrayal of MS as a distant practice associated with poor working conditions in developing countries (Weitzer, 2014; Phung and Crane, 2018). In the upcoming section, I review scholarship on transparency in supply chains as the legal compliance requirement for UK Businesses.

2.2.3 Transparency in Supply Chains

To address the risks of MS in supply chains, transparency has become the central tool of MS legislations in the last decade. Transparency in supply chain (TiSC) is the main approach

recommended in policy and law and thus debated in scholarship (Stevenson and Cole, 2018; New, 2015). In the UK, the Transparency in Supply Chains provision under Section 54 of the MSA of 2015 seeks to address the role of businesses in preventing MS from occurring in supply chains. It requires commercial entities that supply goods and services with an annual turnover of £36m or more to report annually on their actions to identify, prevent, and mitigate MS in their supply chain (HM Government, 2019). The legislation has received criticism for devolving responsibility to business and questions arise over the extent to which it is effective. MSA is also criticised for the lack of robust monitoring to oversee its implementation, weaknesses in data collection in the UK, and the lack of a central, statutory body with the responsibility to collate and analyse data on both victims and perpetrators (Christ and Burritt, 2018).

The effectiveness of the MSA is brought into question due to its lack of specificity and legal force (LeBaron and Rühmkorf 2017; Nolan and Bott 2018). Under the provision, companies are not prohibited from engaging in MS practices, but only encouraged to disclose any efforts to eradicate MS in their supply chains. To foster innovative responses from businesses, the government does not prescribe what an appropriate response to MS looks like, therefore it does not mandate what the reporting should include, nor does it sanction companies failing to report (HM Government, 2015; Stevenson and Cole, 2018). Commercial organisations' duty to disclose aspects of their supply chain operations, the nature and scope of their responsibilities to respect human rights and eliminate MS practices in their supply chains are still up to individual organisations' discretionary interpretation, and thus remain controversial (Wen, 2016).

In contrast, experts on MS in Business, including the Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Business Conduct (OECD, 2017) advocate that an approach focused on responsibility can be effective in implementing and enforcing transparency mechanisms to ensure MS is not taking place within businesses or their supply chains. However, the approaches to achieve this are still unclear, as responsibility in a business context can take many forms framed under human rights or CSR. They argue that businesses could exert their power to generate concrete actions in their supply chains, which is consistent with scholarship examining substantive approaches to CSR (Michelon et al., 2015). Concrete actions against MS would also lead to substantive content in Modern Slavery Statements (MSS). However, research indicates that the most common practices used by multinational companies is delegating all MS responsibility to suppliers by means of a code of conduct (LeBaron and Rühmkorf 2017; Stevenson and Cole, 2018) which does not require the company to change its own practices and is therefore not considered substantive action on the part of the company (Crane et al., 2018; Antonini et al., 2020).

In practice, transparency mechanisms revolve around auditing and certification, which remain the most common ways of collecting information and constructing assurances of responsibility (Bartley, 2020), while responsibility is further devolved via codes of conduct to suppliers who operate under the pressure of turning a profit in highly competitive contexts. Many of the practices reportedly employed in MS reporting have also been used to detect and respond to other labour or human rights issues in supply chains. Stevenson and Cole (2018) advocate for detection, remediation, standard setting, and risk avoidance. One of the key issues regarding labour exploitation is its potential invisibility and the difficulty of detection. Organisations encounter significant levels of active deceit and denial from anyone involved in forced labour, and so normal use of auditing and certification mechanisms is likely to be

problematic (New, 2015). Consequently, Barrientos (2008, 2013) further argues that codes of labour practice fail to reach the most vulnerable workers, particularly those employed by labour contractors and do not tackle issues like freedom to join a trade union. According to Hirsch et al. (2020) codes of conduct and related CSR practices fail to eliminate dangerous and exploitative working conditions or the repression of labour rights in supply chains. Although they can help to improve working conditions in some circumstances (Barrientos, 2019), researchers stress that codes of conduct need to be combined with credible monitoring, meaningful remediation, and long-term relationships between businesses and suppliers. Simply adding standards or policies without altering sourcing practices does not generate change (Locke and Samel, 2018; Anner and Dutta, 2019). When compliance and sourcing efforts are aligned, greater improvements are likely, but there is no evidence that this is the case in more than a handful of businesses (Bartley, 2020).

Similarly, Crane (2013) stresses the importance of extending monitoring activity to contract labour agencies, which often supply forced labour yet operate outside the scope of a typical audit. The process of gathering data on MS is fraught with politics and contestations over which practices qualify as exploitation (Sarfaty, 2020). Auditors have significant discretion as they negotiate the indistinct line between vulnerability, coercion, and severe exploitation, (Sarfaty, 2020). Third-party auditors and consultants struggle to gather data on such a complex and sensitive issue. Workers may be afraid to talk openly with auditors about risks of MS because they fear for their safety and reprisals from their employers (SEDEX, 2017). There also may be a stigma attached to the issue, as workers may not identify as victims of MS or do not want to be labelled as such (Barrientos, 2017; Sarfaty, 2020). Moreover, even when MS is detected, it has been claimed that national labour legislation often does not help migrants and subcontracted workers (Barrientos, 2013; Nolan and Boersma, 2019). As Barrientos (2008) points out, subcontracted workers are often not covered by corporate codes of practice, which may take advantage of the potential ambiguity of the terms 'supplier' and 'employee', which is why labour exploitation may have a relatively lower visibility compared to other exploitative practices (New, 2015; Caruana, Crane et al. 2021). The involvement of third-party labour agencies means practices need to either be tailored or other more rigid approaches developed to augment complex recruitment practices (Phung and Crane, 2018), including in collaboration with traditional and non-traditional actors (LeBaron, 2014).

NGOs such as the Walk Free Foundation recognise the importance of TiSC noting that not many businesses understand what constitutes MS or just how susceptible their own supply chains are to it (UNODC, 2018). While scholars and other NGOs point to the limitations of transparency and call for change in the UK MSA (2015), including mandatory reporting, robust monitoring, and a statutory body with the responsibility to collate and analyse data on both victims and perpetrators (Christ and Burritt, 2018). As Annesley and Reilkoff (2014) comment, transparency, although necessary, is not sufficient to achieve positive change alone. To address the limitations of transparency, partnership is suggested as a solution among other strategies focusing on corporate governance and corrective action plans (Stevenson and Cole, 2018; Mende and Drubel, 2020). In the next section, I review scholarship on how businesses are interpreting transparency in supply chains and responding to MS by developing policies and codes of conduct.

2.2.4 Business Response to Modern Slavery

The Home Office Statutory Guidance for Transparency in Supply Chains (TiSC Guidance) plays an important role in businesses' response to MS. The TiSC Guidance (HM Government, 2017; 2021) explains how businesses should comply with the MSA and lays out the expectations for corporate reporting. It provides a non-exhaustive list of information that 'may be included' relating to *the organisation's structure and supply chains; policies in relation to slavery and human trafficking; due diligence processes; risk assessment and management; key performance indicators to measure effectiveness of steps being taken; training on modern slavery and trafficking*. To comply with the MSA companies need to ensure their MSS are: *available on the homepage of their UK website, approved by the board of directors, or equivalent, and signed by the director, or equivalent* (HM Government, 2017; 2021). Although it has been updated in 2021 to illustrate 'best practice', the statutory transparency requirement leaves full discretion to companies and simply asks for steps the organisation has taken to ensure that MS and HT are not taking place (HM Government, 2017; ETI, 2018; IASC, 2018). Therefore, companies that are not taking any action to address MS in their organisation or their supply chain only need to issue a statement that they have not taken such steps (Barrientos, 2017; Sarfaty, 2020).

Reporting is difficult to assess and compare (Craig 2017; Ergon 2018) however, recent studies emerging from scholars and NGOs inform the mechanisms businesses engage with to produce the statements (Sarfaty, 2020; Nolan and Boersma, 2019; Monciardini et al, 2020; Stevenson and Cole, 2018; Walk Free Foundation, 2019). Research indicates that the vague legal norms around MS are interpreted by corporate actors through the chain of translation (McVey et al., 2022; O'Kelly, 2019). Information concerning MS and HT is transformed to quantitative metrics of indicators, auditing protocols, and checklists to assess supply chain risks of MS and results are polished into corporate statements (Sarfaty, 2020; McVey et al., 2022; Hirsch et al., 2020). In analysing the translation process that occurs in businesses' interpretation and response to MS legislation, researchers acknowledge the role of independent service providers; these 'invisible actors' (Sarfaty, 2020) are MS experts, auditors, and consultants, who provide a key role in shaping how legal norms are interpreted and supply chain governance operates in practice (Sarfaty, 2020; Smit et al, 2021). They provide companies with the tools to perform risk assessments and due diligence in compliance with the MSA and to then convert quantitative risk indicators and checklists into a polished corporate disclosure MSS, consistent with TiSC Guidance recommendations that statements report certain information about a company's supply chain.

The mechanisms used to identify and address the risks of MS, although not fully understood, are informed by practices employed to respond to other CSR, labour, or human rights issues in supply chains. Independent service providers are serving an important role by providing tools for companies to perform risk assessments and due diligence in compliance with the MSA (O'Kelly, 2019; Sarfaty, 2020). One such example is adopting supply chain due diligence, introduced by the UN Guiding Principles (UNGPs) on Business and Human Rights as Human Rights Due Diligence (HRDD) to identify, prevent, mitigate, and account for actual or potential human rights impacts a company may be involved in directly or via supply chains (Smit et al, 2021). Due diligence is defined as the ongoing, dynamic, and contextual approach (O'Kelly, 2019; Smit et al, 2021) which extends beyond the traditional initial screening of a supplier. HRDD has been incorporated into legal standards and framed using risk discourse to interpret

the interplay of 'chance and harm' (O'Kelly, 2019). Breaches of HRDD present reputational risks for businesses with the standard focus on procedural and operational practice (O'Kelly, 2019; Smit et al, 2021).

At the same time CSR discourse with a procedural focus (Smit et al, 2021) is also employed to translate MS risks and reports based on conventional business frames of ethical behaviour and responsibility. CSR debate and public discourse on business responsibility, facilitates exploring the intersection of business and society by referring to ethical behaviour, responsibilities, and values (Carroll, 1999; Humphreys and Brown, 2008). While CSR discourse is perceived in relation to organisations' socio-political context and intersects with economic, social, and environmental responsibility expectations and discussions (Aslaksen, Hildebrandt and Johnsen, 2021) businesses have embraced CSR terminology in the past decade more than any other of the concepts in corporate discourse (Aslaksen et al., 2021; Carroll, 2021). Responsibility, as a concept, is concerned with profits, people, and the planet and is perceived as a 'balanced approach' compared to MS discourse. Additionally, HRM issues relating to recruitment, employment, employee wellbeing, and health care (Stevenson and Cole, 2018) are increasingly adopted in corporate reporting, particularly in the aftermath of the COVID-19 pandemic and social unrest of 2021 (Aslaksen et al., 2021; Carroll, 2021). Corporate rhetoric in general has turned to risk as a bridge between familiar corporate account giving processes and organisations' claims about their responsibilities and values (Carroll, 2021). Risk acts as a 'familiar frame' of proactive engagement with legislation (O'Kelly, 2019; Sarfaty, 2020) that can help articulate key issues in measurable terms. Using the familiarity of risk terminology suggests that MS and HT are incorporated within familiar corporate practices alongside environmental, social, financial, and reputational risk (O'Kelly, 2019; Sarfaty, 2020).

Following the standardised list supplied in the TiSC Guidance (HM Government, 2021) corporate statements are produced using generic language adopted from human rights due diligence, CSR, and HRM discourses that lack substantive and meaningful information concerning MS risks and identifying exploitative practices (Sarfaty, 2020). The MSA has received criticism from scholars and practitioners after an early analysis of the first 75 statements published. This shows that less than a third of the companies complied with the legislation's basic procedural requirements (BHRRC, 2019; Nolan and Boersma, 2019; Nolan and Bott, 2018). As Nolan and Bott (2018) point out, only nine statements covered the six suggested areas on which information may be included, such as organisational structure, company policies, and due diligence. More recent studies exploring the effectiveness of MS reporting found that key performance indicators are the item least well addressed in MSS (Ergon 2018; Sarfaty, 2020). Such analyses suggest that broadly framed reporting requirements may not be the most effective mechanism for achieving levels of transparency that may be converted into accountability (Nolan and Bott, 2018). Since then, the same dissimilarity in attitudes towards reporting has been observed upon examining the quality of MSS in the hotel sector (Walk Free Foundation, 2019), food and tobacco sectors (Monciardini et al, 2020). Studies show that reporting is sparse, although the industries are exposed to exploitative practices with profound implications for workers' labour and human rights (Monciardini et al, 2020; Stevenson, 2018; Walk Free Foundation, 2018).

A company can state that it has taken no steps and still be compliant with the legislation (HM Government, 2019). As a result, the published statements in UK businesses have been found to vary in content. By only setting general requirements on what should be reported, the disclosure mechanisms have resulted in a variety of MSS, ranging from vague one-page

corporate accounts, to detailed reports of over twenty pages. Few organisations have been compliant within the scope of regulations in publishing a MSS on their websites, since the MSA in 2015 (HM Government, 2015; Stevenson and Cole, 2018; Sarfaty, 2020). In addition, most statements do not trace the entirety of corporate supply chains, with the majority failing to go beyond the first tier. MSS provide little detail of MS risks beyond simply describing corporate products and services and making general commitments to ‘slavery free supply chains’ (BHRRRC, 2017). At the same time, a number of corporate directors argue that while they do not tolerate MS, HT, or labour exploitation within their operations, they absolve themselves from any responsibility by placing the ultimate responsibility onto their external suppliers to ensure compliance (LeBaron, 2018).

MS is often presented as a complex crime due to its hidden nature and lack of observability. In a business context this is further complicated by the lack of consensus on how MS is defined by different actors, the types of exploitation that occur in businesses, and the nuanced interpretation of risk. Although more recently MS and labour exploitation have received increased attention from policy makers, law enforcement, and scholarship (Smit, 2011; Amantia et al., 2020; Crane et al, 2019; Christ and Burritt, 2018; LeBaron, 2014), major knowledge gaps persist around basic aspects of labour exploitation in business and, implicitly, the effectiveness of countermeasures (Phung and Crane, 2018). To make matters worse, the complex supply chains of many organisations pose challenges to identifying and addressing MS and implicit exploitative practices. To address this, legislation is being introduced in the UK (and abroad) to promote transparency in supply chains, however, many scholars and MS experts are criticising this legislation for lacking strength and not changing business practices. In lieu, many suggest that partnerships are suggested to debunk the complexity of MS and address limitations in TiSC, however, the specifics of their outcomes, membership, and governance are unclear. This study aims to address this gap by examining the role of partnerships to address MS in the event sector.

2.3 Modern Slavery in the Event Sector

Industry and scholarly interest in the management of events has grown and evolved over the past five decades (Getz and Page, 2016; Park and Park, 2017; Manthiou et al., 2017), in part stimulated by the increased frequency and range of events organised. Preceded by the US and Australia, the UK is currently the third most common location for studies on event and festival management (Draper et al, 2018). Mega-events, sport events, and festivals are the most discussed and researched subjects of event management, partly due to their prevalence at all experience levels, including amateur, recreational, and professional (Draper et al, 2018; Kim and Kaewnuch, 2018). While some social and labour issues have received some attention in the context of mega-events (Matheson and Finkel, 2013; Mair and Whitford, 2013; Kim et al, 2015), MS and issues of labour exploitation, forced labour, and HT along with a vast proportion of the industry (namely: business events and cultural events) remain largely unexplored (Getz and Page, 2016). Former studies investigating MS and HT in the event industry focus solely on sexual exploitation in connection to mega-events (Matheson and Finkel, 2013; Mair and Whitford, 2013). A handful of recent studies have explored human rights issues in the UK event sector and sexual exploitation of women and children in the niche subsector of sports mega-events (Adams and Piekarz, 2015; LeBaron, 2018; Kim et al, 2015).

2.3.1 Identifying Modern Slavery Risks in Events

Given the lack of research on MS and labour exploitation in the field of events, it is important to acknowledge the relationship and shared characteristics the event industry has to other service sectors, especially the tourism and hospitality industries, where instances of sexual and labour exploitation have been uncovered and studied in recent years (Lusby et al. 2015; Kim and Kaewnuch, 2018; Paraskevas and Brookes, 2018b; Annison, 2013; Armstrong, Giulianotti and Hobbs, 2016; Robinson, 2013; Foot, 2016). Tourism, hospitality, and events organisations operate within proximity, in addition to which they also share a number of similarities. In relation to tourism, events are seen as an important motivator for increased domestic and international visits (Getz, 2008; Dowson and Bassett, 2015), and an effective enhancer of destination image (Hall, 1989; Ritchie, 1984). According to Getz (2008) events are one of the more important factors influencing consumers to travel, thus helping promote and aid the growth of tourism. The effects and influences of mega-events have been well recorded and play an important role in attracting visitors to a destination. They can significantly affect destinations' competitiveness (Getz and Andersson, 2010; Kim and Kaewnuch, 2018). Similarly, sporting events are a significant motive for travel and have increased competitiveness between tourism destinations to attract tourists (Lusby et al. 2015). The event sector is also closely linked to hospitality and heavily reliant on hospitality facilities in terms of event venues and guest accommodation (Getz, 2008; Getz and Andersson, 2010).

Hospitality and tourism sectors have received increased interest in connection to MS in recent years. The tourism and hospitality industries play an unintentional role in sexual trafficking through accommodations and transportation (Tepelus, 2008; Lusby et al. 2015; Carr, 2016). Stakeholders are often unaware of signs and hence might unknowingly facilitate sex trafficking and the transportation of human trafficking victims. Furthermore, the employees in the two sectors may not be fully aware of how often victims are trafficked through businesses in the tourism industry (Lusby et al. 2015; Kim and Kaewnuch, 2018). At the same time, the hotel industry has been linked to both sexual and labour exploitation (Paraskevas and Brookes, 2018a). Paraskevas and Brookes (2018a) identify the hospitality industry as a sector vulnerable to crimes of HT. Hotels in particular provide a venue for traffickers to sexually exploit victims although evidence suggests that they are also used for labour exploitation (Annison, 2013; Armstrong et al., 2016; Robinson, 2013). Evidence from GLAA (2022) shows an increased risk of MS and labour exploitation in sectors with a high staff turnover and where jobs are low skill and low wage, giving exploiters ample opportunity to thrive unnoticed. This assessment includes hotel and food services, events, and industries in their supply chains (including cleaning, catering and labour providers), where labour is the most prevalent type of exploitation (GLAA, 2022). Labour exploitation cases identified in the hospitality industry includes criminal practices such as forced labour, bonded labour, criminal exploitation, and forced prostitution, (Smit, 2011; Crane, 2013; Christ and Burritt, 2018) which has been included under labour exploitation, given the involuntary nature of the work and the menace under which victims are working (Bakirci, 2009).

On a broader scale, the socio-cultural context of MS in the hospitality sector has been examined in recent studies (Paraskevas and Brookes, 2018a; Robinson, 2013). Paraskevas and Brookes (2018b) find that many stakeholders in the hospitality sector are unable to distinguish between voluntary and forced prostitution and are unaware of the extent to which prostitution today is forced by criminal groups (Schulze et al., 2014). More surprisingly, many

members of the general public believe there is nothing wrong with the prostitution, sexual, and labour exploitation of immigrants (Paraskevas and Brookes, 2018b). A study conducted by Schofield et al, (2018) shortly after the Olympic games in London examines the negative impacts of mega-events on the local community. Similar to hospitality stakeholders, the interviewed residents deny the possible negative impacts, including sexual exploitation and actively choose to maintain a positive image of the Olympic games and its impacts on the community (Schofield et al, 2018).

Event studies raise concerns over the increased demand for sex tourism and prostitution in connection to large sporting events (Finkel and Finkel, 2015; Mair and Whitford, 2013; Adams and Piekarz, 2015; Holmes et al., 2015). With the influx of tens of thousands of participants at such events, they indicate that the influx of attendees contribute to heightened demand for sexual services, and therefore provide criminal opportunities for sex trafficking (Adams and Piekarz, 2015). Quantifying human trafficking for sexual exploitation, however, has proven difficult due to its clandestine nature; this is not to say that human trafficking for sex as well as forced sexual exploitation does not occur (Matheson and Finkel, 2013; Adams and Piekarz, 2015; Finkel and Finkel, 2015)

In addition to the shared characteristics with hospitality and tourism, events distinguish themselves through their transitory nature (Getz, 2008). They may recur, but while in situ, they last only for a defined, relatively short period. If they do recur, it may be in a different location, thus for any given place, the significance of playing host is paramount (Getz, 2008; Hall, 1989; Ritchie, 1984). Consequently, the transitory nature combined with high levels of seasonality (Getz, 2008) pose additional risks and the short life span means that criminal opportunities are more appealing (Albanese, 2008; Stevenson and Cole, 2018). Whether the event is regular or a single occurrence, seasonality impacts both internal and external stakeholders and poses risks of negative socio-economic impacts (Kim and Walker, 2012). In addition to outsourcing agency staff, the events industry generally has a high level of volunteer workers and with events running over several days, the use of volunteers is economically beneficial for the event organisers (Baum and Lockstone, 2007; Ingerson, 2001). In employment terms, using volunteers and outsourced labour can be a direct means by which commercial enterprises seek to reduce their costs and, possibly, increase profits for their shareholders (Baum, 2015). Howard and Burns (2015) also speak about the increasing dependence on volunteers or unpaid work in events, as well as in the rapid increase of unpaid internships and 'starter' jobs seen in the industry.

The debate on such labour models, whether genuine volunteering or 'forced' upon workers is addressed by several scholars in the field (Ackerman and Furman, 2015; Adams and Piekarz, 2015; Schofield et al, 2018). Although MS is not specifically discussed in these studies, they describe practices amounting to labour exploitation which might be present in the event sector. This poses questions over the ongoing debate surrounding the 'hard end and soft end' of MS (ILO, 2008; Skrivankova, 2010). Practices describing forms of human or labour rights infringement in events correspond to Quirk's (2009) sufficient similarity model, while legal frameworks encourage business actors to focus on MS and TiSC (HM Government, 2017).

Recent research in the fields of hospitality and tourism (Stevenson and Cole, 2018; Paraskevas and Brookes, 2018a; Abson, 2017) allows to identify risks of labour exploitation within events organisations and their supply chains and increased instances of sexual exploitation in connection to events (Lusby et al. 2015; Schofield et al, 2018; Pettman, 2010;

GLAA, 2022). There is a lack of research specific to the events and MS, instead human rights, labour rights, and social impact are the subject of many studies in the events field.

2.3.2 Human Rights, Labour Rights, and Social Impact

The socio-economic impact of events is largely studied in the context of hallmark and mega-events. These are two distinct types of large-scale international events that receive substantial attention from scholars, event management companies, and Destination Management/Marketing Organisations (DMOs) (Roche, 2000; Getz and Page, 2016; Kim and Kaewnuch, 2018). Viewed as event tourism, hallmark and mega-events can bring significant socio-economic benefits to the host destination hence the increased interest from DMOs to host such events (Getz and Page, 2016; Kim and Kaewnuch, 2018). Although they can be similar in size, duration and number of participants, hallmark and mega-events distinguish themselves based on occurrence and location; hallmark events are major fairs, festivals, expositions, cultural, and sporting events which are held on a regular or a one-off basis. They are developed primarily to create interest and attract attention, to enhance the awareness, appeal, and profitability of a tourism destination in the short or long term (Ritchie, 1984; Kim et al, 2015). Examples of hallmark events include Rio de Janeiro Carnival, Edinburgh Festival Fringe, Venice Carnival, Mardi Gras, Glastonbury, Coachella, Notting Hill Carnival, Pamplona's Running of the Bulls (Kim et al, 2015). Mega-events such as Olympic Games, FIFA World Cup, Super Bowl, and Formula 1 target international markets and are held on a regular basis; although the hosting region generally changes from one occurrence to the next (Getz and Page, 2016; Kim and Kaewnuch, 2018).

Due to the wide range of national and international participants and longer lifespan, compared to any other type of events, mega-events and hallmark events are generally regarded as leveraging opportunities for economic growth and urban (re)development (Kim and Walker, 2012; Ritchie, 1984). Increasing income and job opportunities, minimising inflation (Kim et al, 2015; Dowson and Bassett, 2015), and enhancing the status of under-represented cities or countries are some of the positive socio-economic outcomes from hosting mega-event (Draper et al, 2018). Roche (2002) discusses at length the positive impacts and long-term consequences of large-scale events on the host destinations. They receive substantial investment and involvement from central or local government (Hall, 1989), and have the ability to focus national and international attention on the destination, described as spatial reach (Ritchie, 1984); however, until recently the negative impacts of events have seldom been explored.

Kim et al (2015; 2018) demonstrate that events can result in significant economic costs, taxes, and real estate with negative socio-psychological impacts. Negative social impacts including disorder, security issues, and traffic congestion are impacting local communities and visitors (Kim et al, 2015; Draper et al, 2018). Considering these negative impacts, researchers note that event planners and government officials are beginning to promote social benefits like civic pride, community image, and fostering political consolidation that result from hosting a large-scale event. Although the potential negative outcomes are ever-present, a high level of demand for hosting mega-events remains (Kim et al, 2015).

Blackburn et al (2011) voice concerns about human rights with reference to sports events. In many cases the negative impacts are taken for granted, overlooked, or omitted as 'real-world' costs by sport event organisers (Holmes et al, 2015). The authors state that additional research is needed to make any assessment of the impacts on human rights, and connections to MS (Blackburn et al, 2011; Holmes et al, 2015). Cohen (2001) describes this process of denial of human rights implications as the maintenance of social worlds in which an undesirable situation is unrecognised, ignored, or made to seem normal.

In addition, Adams and Piekarz (2015) explore sports events and human rights issues; they identify multiple points of tension between human rights and events relating to land-use, displacement of local communities, and work and employment practices (Adams and Piekarz, 2015). The impact of developing sporting facilities together with associated infrastructure can have profound implications for the workers' human rights. Construction, directly and indirectly, creates employment opportunities, both paid and voluntary, the quality of which has received increased attention in recent years (Adams and Piekarz, 2015; Phung and Crane, 2018). Work and employment practices have also been identified in separate studies conducted by Worden (2015) and Holmes et al (2015) who examined the abuse and exploitation of migrant workers in connection to developing sporting facilities. Migrants in the UK labour market are defined by the Home Office as individuals born outside the UK (HM Government, 2022), who arrive in a host country within the last five years, either with a job or with the intention to secure a job (Wright and Pollert, 2005). Although migrant's labour experience in hospitality has been portrayed as opportunities for mobility in hospitality and tourism (Rydzik et al., 2012) and means to overcome struggles for enhanced economic wellbeing (Kim and Walker, 2012), employment conditions often result in unmet expectations concerning poverty reduction, career frustrations, and reports of double standards towards migrant workers (Ndiuini and Baum, 2021). The refugee crisis in Europe further complicates mobility and migration pathways and has provided increased opportunities to traffickers and criminal organisations, with evidence rendering refugees more prone to trafficking than other migrants (Paraskevas and Brookes, 2018b; Robinson, 2013; Pettman, 2010).

Labour rights and employment conditions in events and hospitality render migrant workers across the globe more vulnerable to exploitative practices and abuse. Employment in hospitality and events, in the UK and globally, is portrayed as problematic for all workers, particularly for migrants (Lugosi and Ndiuini 2022; Janta et al, 2011). The sectors are characterised by '3D' (dangerous, difficult, and dirty) working conditions (Dowling et al., 2007) and status devaluation for migrants (Baum et al., 2016; Lugosi and Ndiuini, 2022). Migrant workers, particularly those in low-skill roles in hospitality, tourism, and events are often vulnerable to exploitation in employment. Some workers in the sector are paid daily fees as opposed to hourly wages (which is custom in hospitality and events). Living and working conditions are often described as poor, with accommodation routinely provided by employers at or close to the working location. Victims of exploitation in hospitality report sleeping on floors and general ill-treatment. A small number report being moved between connected locations, possibly indicative of human trafficking (GLAA, 2018; 2022).

Many migrant workers may accept employment in some of the worst jobs and are often the least protected in terms of employment rights which may leave them open to exploitation (Janta et al, 2011; Mishra, 2013; Pocock et al., 2020). Workers' rights are vulnerable to discrimination, racial abuse by restaurant customers, and bullying from other staff (Wright and Pollert, 2005). Management is criticised for racial abuse and exploitation (Janta et al, 2011).

Evidence of discrimination is part of the wider issues concerning the employment of marginalised groups often on temporary contracts. Many workers in hotels and catering are recruited through employment agencies, and as a result can suffer subpar terms and conditions compared to directly employed workers (Wright and Pollert, 2005; Janta et al, 2011).

In addition to their unfamiliarity with the local culture, language barriers, labour rights, and national migration laws in the country of employment, migrant workers are reliant on recruitment agencies to handle the recruitment and visa procedures (UNODC, 2015). Unscrupulous recruiters, recruitment agencies, and other intermediaries often take advantage of migrant workers' lack of information, education, and language skills, to deceive them and prevent them from leaving their employment. According to the United Nations Human Rights Council (UNHRC, 2014) a common practice of recruitment agencies is to charge workers recruitment fees, which further increases migrant workers' vulnerability to exploitation. Charging recruitment fees is often associated with fraud, deception about working conditions, and employment rights. These factors are amplified by discrimination that migrants are increasingly facing everywhere. Differences in treatment are reported between temporary and permanent employees in hotels. Permanent employees experience better conditions of employment whereas seasonal workers tend to enjoy less job security and fewer job opportunities and may act as a buffer to protect core workers from shifts in demand (Wright and Pollert, 2005; Ndiuni and Baum, 2021).

Intelligence from the GLAA (2022) suggests that agencies based overseas charge recruitment fees to appoint migrant workers in the UK hotel sector. There is also evidence of employers directly requesting money in exchange for work (GLAA, 2022; 2018). Wages can reportedly be as low as £10 per shift, with some employees working up to 15 hours a day. Conditions of the work permits, and visas keep workers under the employment of a set employer. This means migrant workers lack the flexibility to change employment conditions and remain attached to a single employer regardless of workplace conditions or challenges for fear of deportation. This further exacerbates the workers' career frustrations, as these barriers take control of the workers' geographical or career mobility, given the lack of institutions to support them in the host country (Ndiuni and Baum, 2021).

Within the reviewed literature, scholars identify negative social impacts of events, including the abuse and exploitation of migrant and agency workers (Mair and Whitford, 2013; Kim and Kaewnuch, 2018). In the context of events, human rights are often ignored and become entangled with CSR and issues of worker abuse, corruption, and fraud (Finkel and Finkel, 2015; Dowling et al, 2013). However, such practices are not associated with risk or concern for MS and labour exploitation in events scholarship. The rationale for this terminology is unclear: whether events researchers and practitioners are choosing to frame these issues as human rights, labour rights, and social issues instead of MS risks or whether this indicates a lack of awareness regarding MS risk in the sector. Whether this points to an inability to identify or articulate MS risks, the consequence of unspecific MS terminology in events leads to a lack of awareness in the field and undermines the urgency of establishing preventative measures (Brunovskis and Surtees, 2019; Dowling et al, 2013).

Although the need for partnerships and collaboration has been identified by researchers and practitioners in the field in connection to improved safety and security for events, it is unclear what measures are used against MS within the sector (Draper et al, 2018; Eventbrite, 2018).

To address this gap, this research project aims to investigate the current individual and corporate initiatives against MS in the field of events. It does so by shifting the focus away from the niche subsector of mega-events and takes a broader scope to capture the perspectives of stakeholders working in all types of events including business events, festivals, and cultural events, and their suppliers.

2.4 Conclusion

To summarise, in this chapter I explored current debates on MS in business contexts and the mechanisms to address it with a particular focus on the event sector. In a business context, MS represents an extreme on a continuum between exploitative practices and poor labour conditions (Skrivankova, 2010; Tallmadge and Gitter, 2017; Barrientos, 2008; 2013). This leads to an ongoing debate labelled as the 'hard end and soft end' of MS (ILO, 2008; Skrivankova, 2010; Waite et al., 2015;). The UK event sector has been identified as a particularly important area of interest in connection to MS due to its characteristics (Dowson and Bassett, 2015) and to evidence of abuses to human and labour rights in the sector (Abson, 2017; Quinn, 2013; Baum, 2015).

Recent research on both sexual and labour exploitation in the related field of hospitality suggests that the events industry faces similar risks because of its shared characteristics, trends, and customers. Despite the evidence of abuse and exploitation of migrant and agency workers identified within events organisations and their supply chains (Draper et al, 2018; Matheson and Finkel, 2013) MS in the sector of events has only been investigated in connection to sexual exploitation (Andrees and Linden 2005; HM Government, 2017; Surtees 2008). In addition, the responsibility that event organisations have over their suppliers remains unknown, even though the supply chain of events (construction, textile and garments, restaurants, and catering services, etc) have been identified by the ILO as industries at risk due to highly exploitative labour practices (ILO, 2015; Quinn, 2013; Smit, 2011). At present, it is unclear what preventative measures are applied within the field of events and whether partnerships have been developed to address MS in events or more generally in business. To address these gaps in knowledge, this study seeks to explore the perspectives of stakeholders in the event sector concerning MS and the mechanisms to address it.

Although legislation is introduced in the UK and abroad to address MS in business and to promote TiSC, many scholars and MS experts are criticising these legal frameworks for lacking strength and not changing business practices. In lieu, many suggest that partnerships are needed to debunk the complexity of MS and address limitations in TiSC, however, the specifics of their outcomes, membership, and governance are unclear. This study aims to address this gap by examining the role of partnerships to address MS in the event sector.

3 Partnership Research and Theoretical Framing

3.1 Introduction

This chapter explores scholarship on partnerships that address complex issues. It introduces partnerships as an emerging area of research within anti-slavery strategies (Dean and Marshall, 2020; Gardner, 2018; Christ and Burritt, 2018; Cockayne, 2015; Blackburn et al, 2011). It draws on different disciplinary perspectives from studies including business, organisational studies, and public policy to explore and theorise partnership approaches to addressing MS and stakeholder engagement in business and events. The final section of this chapter critically evaluates the relevance of Stakeholder and Partnership Theories in relation to the research aim and develops a Conceptual Framework through which I analyse stakeholders' perspectives and responses to MS in the upcoming chapters.

3.2 Partnerships to address complex issues

The complex, multi-faceted issue of MS requires a comprehensive response from government and non-government entities in such areas as human rights, labour and employment, health and services, and law enforcement (Bales, 2007; Brunovskis and Surtees, 2019). To address the complexities of MS, partnerships is often proposed as a solution by scholars, industry stakeholders, policy makers, and the civil society (Blackburn et al, 2011; Dean and Marshall, 2020; Christ and Burritt, 2018; Cockayne, 2015; Van Dyke, 2017; Gardner, 2018; Foot, 2016). In this section, I review scholarship and other publications to uncover the type of partnerships that address MS and other complex issues. I discuss their membership, outcomes, and development with reference to addressing MS. While there is little research concerning partnerships seeking to address MS that include businesses and none that includes event organisations, this section explores partnerships against MS in the UK at a local and national level, as well as partnership approaches to address other complex issues.

3.2.1 Partnership approaches

Research identifies several approaches to partnership to address MS including Peer to Peer (P2P) networks, Public Private Partnerships (PPPs), and Multi-agency or multi-stakeholder partnerships (MaPs). This subsection discusses the implications of distinct approaches to partnerships in addressing MS. As partnerships against MS are still a new area of research, this section draws from practical evidence (Nottingham Rights Lab, 2018a; Shiva Foundation, 2022; HM Government, 2022; Derbyshire Police, 2022) and research on P2P, PPPs, and MaPs seeking to address MS and other complex issues such as urban planning, economic and infrastructure development, crime prevention, and human rights due diligence (HRDD) (Osborne, 2000; Liu et al., 2014; Mohr and Spekman, 1994; Prenzler, 2012; Goyal and Mishra, 2016; Klijn and Teisman, 2003; Christ and Burritt, 2018).

3.2.1.1 Public-private and multi-agency partnerships

Public private partnerships (PPPs) also referred to as multi-agency partnerships (MaP) are defined by the ILO (2011) as the collaborative relationships among various actors in the public (central and local governmental authorities) and private or non-state sectors. Many such initiatives do not necessarily include businesses. This has important implications in the context

of this research seeking to explore partnerships that address MS in the field of events. Therefore, for the purpose of this research, I use PPPs to refer specifically to partnerships that include businesses in their membership and MaPs to refer to those which may not include private sector organisations in their membership. This important distinction impacts both the membership and outcomes of partnerships.

Both PPPs and MaPs are based on the idea of mutual value and have been examined in studies exploring urban, economic, and infrastructure (re)development and crime prevention (Liu et al., 2014; Mohr and Spekman, 1994; Prenzler, 2012). Depending on the scope they serve, PPPs and MaPs bring together different actors including local and central governments, first responders, law enforcement, health practitioners, non-governmental organisations (NGOs), local communities, faith-based organisations, and in some cases businesses. Partnerships to address MS have varying forms of governance structure (Gardner, 2018). Most MaPs follow the basic framework of bringing together relevant key actors to discuss and address agreed aims (Shiva Foundation, 2022). Evidence on MS partnerships shows that partnerships change form and structure over time as they gain maturity (Nottingham Rights Lab, 2018a; Gardner, 2018; Mohr and Spekman, 1994). Newer partnerships often 'take the form of an informal group or network of stakeholders' (Gardner, 2018: 473), while more mature partnerships can develop as operationally focused networks, meetings, and sub-groups of varying complexity, organised by area or function (Gardner, 2018; Nottingham Rights Lab, 2018a).

PPPs promote the sharing of skills, knowledge, expertise, and ideas between practitioners. They have become increasingly common in addressing complex issues such as poverty, economic development, and crime (Prenzler, 2012; Liu et al, 2014). Cockayne (2015) advocates the need for 'global multilateral' PPPs in rethinking and addressing MS. In investigating PPPs, researchers find public actors (mostly local authorities and devolved governments) to be the key institutions taking planning initiatives and consulting private actors on individual elements of the projects (Osborne, 2000; Liu et al, 2014). In practice, MaPs and PPPs aiming to address MS are said to only be effective if consistently undertaken through a defined framework, pathway, or process (Shiva Foundation, 2022). Although literature on partnership theorises the effectiveness of these measures (McQuaid, 2000), in the context of addressing MS no conclusions have been drawn about which measures are most effective.

To address MS the Independent Anti-Slavery Commissioner (IASC) in partnership with scholars from the University of Nottingham Rights Lab (Nottingham Rights Lab) have developed practical resources in the shape of a Partnership Toolkit to support the development of partnerships across the UK (Nottingham Rights Lab, 2022). Other local and national initiatives developed by law enforcement give insights into the existing work of MaPs (Humberside PCC, 2022; Derbyshire Police, 2022) and provide aspirations for business engagement (Shiva Foundation, 2022). Business engagement in partnership is encouraged by the *Community Engagement* section of the RightsLab Toolkit. The private sector is recognised as a key actor with a prominent role in ending MS. The Toolkit encourages stakeholders to support businesses to detect, address, and deter exploitation in their operations and supply chains. It stresses the benefit of engaging business actors in PPPs as companies may be able to either support the work of the partnership by undertaking awareness raising activities or through funding (Nottingham Rights Lab, 2018a). It becomes clear that partnership initiatives and strategies are tailored for public actors (law enforcement

and local authorities) as those developing and leading the initiatives. These initiatives are in short called ‘anti-slavery partnerships’ and are often aligned to existing MaPs structures, such as local safeguarding boards (Gardner, 2018). Exploring their membership and function shows that many such MaPs are designed to support MS prevention, to protect victims (survivors) of MS, and aid prosecution efforts (HM Government, 2022; Nottingham Rights Lab, 2022). This informs the outcomes of partnerships linked to the three level approaches under the Palermo Protocol (UN, 2000). The RightsLab Toolkit provides evidence of extensive MaPs at local and regional level across the UK. Anti-slavery MaPs are generally led by law enforcement in partnership with local authorities. The prevalence of police as chairs and coordinators of MaPs reflects that addressing MS has originated from the perspective of law enforcement, but that MS cannot be managed effectively by law enforcement alone (Gardner, 2018; Van Dyke, 2017). Still, the membership of MaPs is dominated by law enforcement agencies and closely followed by NGOs, local authorities, and other government agencies, including the Home Office, the GLAA, Her Majesty’s Revenue and Customs (HMRC), and the Department for Work and Pensions (DWP) (IASC, 2022; Humberside PCC, 2022; Derbyshire Police, 2022; HM Government, 2022). Research on partnership engagement and collaboration at a local level stresses the importance to recognise the distinct interests and motivations for engaging in anti-slavery activity, beyond enforcement and prosecution (Gardner, 2018).

Other outcomes of MaP engagement include community awareness-raising, frontline staff training, intelligence sharing, planning for joint enforcement, coordinating referrals, survivor support, monitoring, and analysis of progress (Shiva Foundation, 2022; IASC, 2022; Nottingham Rights Lab, 2018b). Although it is unclear whether these anti-slavery partnerships include businesses in their membership, some of the networks include outcomes specific to preventing MS in business such as supply chain analysis. An evaluation of MaPs and PPPs across the UK conducted by IASC (2019) shows that most partnerships aim to monitor progress. The report reflects that this is often limited to measuring the extent of training and awareness-raising materials, rather than more robust evaluations regarding the impact or success of undertaking different activities (IASC, 2022). Newer initiatives are developing strategies for victim identification and support (Humberside PCC, 2022; Derbyshire Police, 2022; HM Government, 2022; IASC, 2022); meanwhile PPPs that include businesses and focus on supply chains are still infrequent, despite increased acknowledgement of the risks associated with businesses and continued enthusiasm for business engagement in partnerships (Gardner, 2018; IASC, 2022).

The *Governance Library* section of the RightsLab Toolkit includes comprehensive practical guidance for all organisations seeking to develop partnerships, tailored to the desired outcomes of engagement and coupled with examples of other such initiatives in the UK (Nottingham Rights Lab, 2018a). It informs the outcomes and key function areas of anti-slavery partnership and how these can implement the type of structure required. It provides recommendations for frequency of meetings and clear lines of accountability to ensure goals are met (Nottingham Rights Lab, 2018a). The Toolkit governance guidance informs the development of partnership approaches such as MaPs and PPPs. It also highlights several barriers to stakeholder engagement relating to performance management, conflicting interests, communication, transparency, coordination, commitment and contribution issues, trust, and power issues. These barriers are applicable to both MaPs and PPPs.

Conflicting agendas and perspectives are also emphasised as a significant barrier by Shiva Foundation (2022), an NGO working collaboratively with businesses and local authorities on

addressing MS and HT in hospitality and other industries. They stress that conflicting interests emerge not only due to the complex nature of MS, but also due to the fact that many corporate actors simply view MS as ‘another issue area’ added to a long list of corporate issues that require attention (Shiva Foundation, 2022). This is consistent with debates on MS risk translated to conventional business frames discussed in the previous chapter (Sarfaty, 2020; Smit et al, 2021). Furthermore, private sector stakeholders have extremely limited capacity to devote to PPPs engagement. Tension and even conflict among stakeholders are common across the UK, with partnership engagement seen as a ‘voluntary endeavour’, that further heightens workloads and responsibilities (Van Dyke, 2017). To address this Shiva Foundation (2022) advise allocating funding and resource for corporate actors taking on these MS responsibilities and pursuing external engagement in partnership. They advise that a coordinator role is crucial for building capacity in a climate where resources are scarce across many key organisations. In contrast, Foot (2016) argues that tension between actors is not only inevitable, but sometimes necessary to foster reflection among leaders and enhance collaboration.

Research on anti-slavery MaPs links partnership governance to clear direction, risk management, communication, transparency, accountability, inclusivity, equity, and adaptability (Nottingham Rights Lab, 2018b; GLAA 2020). Yet partnership governance remains unknown in addressing MS in business and questions arise over potential additional barriers characteristic to businesses. Furthermore, the resources that businesses allocate to anti-slavery partnership engagement have a direct impact on the success of the partnerships (Foot, 2016). Without resource allocation and coordination, partners face challenges in working together consistently and effectively on a voluntary capacity based on individual initiatives and interest to take on MS responsibility (Van Dyke, 2017; Shiva Foundation, 2022). Furthermore, coordination is advised in designating a central point of contact and support among stakeholders. By comparing partnerships with and without coordinators, Shiva Foundation (2022) find notable differences in the activities of partnerships supported by coordinators.

Scholarship and experts in MS prevention recognise that anti-slavery partnerships are more complex than other collaborative approaches, and advocate for performance management systems to assess partnership success, at organisation and project level (Nottingham Rights Lab, 2018b; Liu et al, 2014). An important principle is that performance measures must reflect the context in which they are applied and the ‘lines of accountability’ to ensure goals are met (Goyal and Mishra, 2016; Nottingham Rights Lab, 2018a). Scholars and practitioners argue that MaP and PPPs should be accountable for progress (IASC, 2022). The IASC (2022) advises that performance management targets or key performance indicators (KPIs) can be broad but should have an element of standardisation. In addition, effective monitoring can help empower existing partners and encourage others to contribute (IASC, 2022). Partnership performance management systems might include establishing tailored and localised strategies, developing yearly action plans, and evaluating activity and impact. According to IASC (2022) performance management would also benefit from a national government led framework. However, practitioners advise grounding performance management targets in a framework for accountability (Shiva Foundation, 2022). In the development of partnership to address MS that include business actors this remains unknown. As such, measurement tools applied for PPPs and MaPs that address other complex issues or anti-slavery networks may not be adequate to assess business engagement in MS partnerships.

Performance management as suggested in anti-slavery partnership research can be defined as a strategic and integrated operational approach to delivering successful outcomes (Nottingham Rights Lab, 2018a). Measuring effective performance management is achieved through joint review and evaluation protocols and joint performance indicators. Research on performance management in PPPs seeking urban development stresses the importance of strong leadership capable of developing the right team, mixing skills, knowledge, and qualities, and gaining understanding about the differences of stakeholders (Liu et al., 2014). In practice, evidence from RightsLab (2019) and Shiva Foundation (2022) shows that most performance management systems for partnerships tend to focus on recording data on meeting minutes and actions with few minor outcomes that are process focused such as number of people trained or exposure to awareness raising materials. They find that the existing methods are not sufficiently robust for effective measurement and evaluation of partnership progress. Recommendations to improve performance management include analysing risk factors, and understanding geographic, demographic, and industry related strengths and weaknesses to identify threats and utilise assets within the sector to address exploitation (Shiva Foundation, 2022; IASC 2022).

Commitment and (un)willingness to coordinate activities are believed to be key characteristics in the success of both PPPs and MaPs and decision making is criticised for being fragmented due to the leading role of public actors (Osborne, 2000) and law enforcement. Unwillingness to coordinate has been studied in the context of developing PPPs focused on labour management and unionising in the UK (Shier and Handy, 2015; Badigannavar and Kelly, 2012). Studies argue that reluctance to engage in collaborations is largely linked to lacking a common goal. Consequently, 'synergy' and 'joint development' are not always possible within PPPs (Klijn and Teisman, 2003) due to information transmitted on a 'need to know' basis and the unequal participation of partners in planning and goal setting. In the context of addressing MS, while similarities across organisational cultures would improve the probability of partnership success, such compatibility cannot be ensured, nor has it been studied in the past. In many cases, differences in culture, operating procedures, and practices often become apparent only during a partnership (Mohr and Spekman, 1994). Such differences are found to be striking in the development of PPPs seeking to prevent crime, defined by Klijn and Teisman (2003: p. 137) as, 'co-operation between public and private stakeholders with a durable character in which actors develop mutual products and/or services and in which risk, costs, and benefits are shared'.

The development of PPPs to prevent crime is associated with the desire to undertake collective action; however, often this action does not result in a collective outcome due to partners' hesitation to commit themselves leading to projects becoming disconnected at a later stage (Mohr and Spekman, 1994; Liu et al, 2014). The collective outcome is underpinned by a clear separation of responsibilities in which each of the actors concentrates on their own task. As a result, some researchers question the value of PPPs due to the dominant pattern, in which the relationship would more accurately be described as contractual, rather than as a partnership (Klijn and Teisman, 2003). This however is not specific to MS. The notion of contractual engagement (discussed in a later section of this chapter) is studied in business and organisations scholarship linked to economic growth and competitive advantage (Lambert, Knemeyer, and Gardner, 2008; Powell, 1987; Thompson and Brent, 2017; Sockett, 1997).

Over the years, governments have expressed support for MaP approaches to ensure more effective responses in tackling crime (Burnett and Appleton, 2004) and anti-social behaviour (Jacobson et al., 2005), involving an extensive use of the criminal justice system (Squires, 2006). In the UK, MaPs are strongly linked to anti-slavery networks (Nottingham Rights Lab, 2022; 2018b), crime prevention, and community safety (Osborne, 2000; Liu et al., 2014; Mohr and Spekman, 1994; Prenzler, 2012; Goyal and Mishra, 2016). MaPs have been introduced as a statutory requirement for local authorities since the Crime and Disorder Act of 1998 (Wastell et al, 2004). More recently, the Home Office's MS Strategy (2017) recognises the need for effective MaPs in combating the crime which include increased awareness among first responders, coordinate national and international activity, closely working with the private sector, and support from communities, including NGOs and faith-based organisations (IASC, 2020; Nottingham Rights Lab, 2022; 2018b).

Research on partnership leadership in crime prevention suggests that law enforcement agencies are generally seen as the stakeholder leading MaPs due to their capacity to exert power over all other actors, their level of authority, and their experience in crime prevention (Gardner, 2018; Donaldson and Preston, 1995; Benstead, Hendry and Stevenson, 2017). This is consistent with practical evidence on partnerships reported by Nottingham Rights Lab (2018) and law enforcement (Humberside PCC, 2022; Derbyshire Police, 2022). In the context of crime prevention, effective leadership is attained by appointing dedicated responsibilities to key actors, developing appropriate accountability systems, and having a transparent decision-making process (Moran et al. 2006). In the context of MaPs aiming to prevent crime, power provokes complex responses about core beliefs and identities (Foot, 2016). Ambiguity over professional boundaries leads to low morale and impacts stakeholders' image and identity (McDonald, and Young, 2012; Benstead, Hendry and Stevenson, 2017). Yet again, the representation and impact of leadership and power are unknown in the context of PPPs aiming to address MS.

3.2.1.2 Peer to Peer Engagement

Peer-to-peer (P2P) networks also called industry networks or forums are partnerships developed by businesses with fellow industry actors, often referred to as competitors, peers or signatories (Piscicelli, Ludden, and Cooper, 2018; GLAA, 2020). This approach to partnership has primarily been studied in social sciences, education, and health care research, with few studies exploring it in a business context, but not in relation to MS (O'Kelly, 2019; Smit et al 2021; Lin, et al. 2022). Recent studies explore organisational behaviours and the impact of P2P engagement on business growth (Piscicelli, Ludden, and Cooper, 2018) and conclude that such initiatives can be highly beneficial when partners acknowledge their mutual dependence and their willingness to work for the survival of the relationship (Mohr and Spekman, 1994). P2P or business-to-business relationships are also studied to assure organisations' competitiveness in an industry (Wilson, 1996), this characteristic of P2P engagement is discussed in a later section of this chapter focusing on the industry.

In a business context, P2P engagement is studied in relation to supply chain management and human rights due diligence (O'Kelly, 2019; Smit et al 2021). Once again, the need for P2P engagement within industry or cross-sectoral business initiatives is stressed (O'Kelly, 2019; Locke and Samel, 2018; Baumann-Pauly et al., 2017), due to a greater chance of joint problem-solving and investments in production enhancements that also enable compliance. Supply chain labour standards are more likely to make a difference when reinforced by

collaborative relationships, ongoing remediation efforts, and supportive purchasing practices (O'Kelly, 2019; Baumann-Pauly et al., 2017). Empirical evidence suggests that P2P engagement leads to improved labour standards in supply chain management in factories and Bangladesh and Vietnam (Malesky and Mosley, 2018; O'Kelly, 2019). P2P collaboration allows business actors to streamline processes and share information. Collaboration is also suggested as an opportunity for businesses to demonstrate their engagement to the public and governments especially as government initiatives can be misguided (Smit, et al 2021). However, P2P initiatives often focus on dialogue, sharing of information, and good practice, but frequently lack accompanying accountability mechanisms, particularly with respect to challenges which a single company is unable to address (Locke and Samel, 2018; O'Kelly, 2019; Smit, et al 2021). Whilst there is no research to date that explores the implications of P2P engagement on addressing the risks of MS in any given sector, practical examples of such networks are detailed by the GLAA protocols developed for construction, supplier/retailer, and textiles industries; their plans to develop a similar protocol for the hospitality sector were halted due to the Covid-19 outbreak. The GLAA's core aim is to work collaboratively to protect vulnerable and exploited workers. Aside from the protocols developed for the above sectors, the GLAA also engages in MaPs with law enforcement and state actors responsible for investigating offences and allegations of labour exploitation across all sectors of the UK economy (GLAA, 2022; Cottone and Gardner, 2019; Humberside PCC, 2022).

The protocols, also called industry networks, facilitate business actors' capacity to raise awareness within their supply chains to prevent MS and protect workers from exploitation or abuse. It informs the necessary steps to ensure that exploitation and abuse of workers is recognised and addressed with appropriate identification mechanisms and safeguards to ensure that exploitative practices do not (re)occur (GLAA, 2022). Organisations, often called signatories, adhere to the protocol independently, to help reduce opportunities for exploitation and MS within their industries. The protocols are seen as business led initiatives to improve industry standards (Cockayne, 2015). The GLAA does not assess signatories' employment or supply chain practices and maintain their investigative and enforcement role should any exploitative behaviour within an organisation come to light (GLAA, 2022). Organisations engaging within the protocol have access to induction and support packages which include practical tools to prevent MS. Although the protocols provide examples of best practice for industry actors, they challenge the capacity of P2P partnerships where the development and engagement in partnership is undertaken by businesses without external intervention. The leading role of the GLAA, makes the protocols similar to PPPs. However, given the engagement and learning opportunity offered to signatories to engage with peers and improve industry standards, they are regarded for the purpose of this research as examples of P2P engagement, facilitated by an external agency.

The importance of developing partnerships has been recognised in a vast number of publications (Blackburn et al, 2010; Dean and Marshall, 2020; 2011; Cockayne, 2015; O'Kelly, 2019; Smit, et al 2021; Matheson and Finkel, 2013; GLAA, 2020, Nottingham Rights Lab, 2018a; Nottingham Rights Lab, 2018b) yet the role that partnerships can play in addressing MS in business remains an underexplored area. Furthermore, the form partnerships should take, the roles and contribution of partners or how they might best identify and deliver shared goals and responsibilities have thus far been underexplored areas, especially when businesses are involved (Christ and Burritt, 2018; Cockayne, 2015). This means that until now,

the development, performance, and success of partnership responses to MS have received scant academic attention, even though it has been recommended as an approach to address MS from by the UN, MS practitioners and scholars. This study seeks to address this gap and advance knowledge on partnerships against MS by focusing on emerging initiatives in the event sector in the UK.

3.2.2 Stakeholder Engagement in Business and Events

At the time of this research there are no studies on partnerships seeking to address MS that include event sector organisations. However, researchers in the event sector recognise the importance of partnerships aimed at economic growth (Draper et al, 2018), although it is unclear how such partnerships are put into practice in events. Broader studies exploring partnerships in the service sector have looked at stakeholders' engagement with other internal and external actors and identified different partnership approaches, serving different purposes within retail, finance, business administration, education, leisure, and cultural activities (Lambert, Knemeyer, and Gardner, 2008; Powell, 1987; Thompson and Jesiek, 2017; Sockett, 1997). Among those approaches to stakeholder engagement are P2P, Contractual, and Transactional Partnerships. P2P and Transactional Partnerships are seen as horizontal relationships (between fellow businesses or peers); while Contractual engagement has been referred to as a vertical relationship between suppliers and buyers (Wilson, 1996).

Although not linked to MS or crime prevention, Contractual Partnerships are explored in supply chain management research (Canzanelli, 2013; Ali, et al., 2019) looking at facilitating and sustaining relationships with suppliers, buyers, and even competitors. This approach to partnership is based on Powell's definition (1987: 71) whereby partnerships can afford a company 'access to new technologies or markets, the ability to provide a wider range of products or services, economies of scale in joint production'. The focus of Contractual Partnership is largely profitability. Contractual Partnerships are developed based on explicit legal contracts, that typically govern the responsibilities and obligations of the stakeholders engaged (Shin, Park, and Park, 2019; Yam and Chan, 2015). They describe the relationship between organisations as an increasingly common way for private actors to find and maintain competitive advantage by setting and adhering to industry standards (Shin, Park, and Park, 2019). While the dynamics of subcontracting are increasingly looked at in business management studies, discussions on eradicating labour exploitation or other social issues from supply chains are scarcely mentioned in the literature on partnerships between businesses and their suppliers.

Literature suggests that organisations are turning to partnerships to strengthen supply chain integration and provide sustainable competitive advantage (Lambert, Knemeyer, and Gardner, 2008). The capacity to strengthen supply chains renders this partnership approach particularly relevant to this study, due to the implications of MS risks associated with supply chains and particularly subcontracting workers. By engaging in partnerships, organisations can share risks, and access knowledge and complementary skills (Powell, 1987). Studies suggest that trust, the willingness to coordinate activities, and the ability to convey a sense of commitment from all stakeholders are paramount to the success of a partnership (Mohr and Spekman, 1994). Critical also to partnership success are the communications strategies used by the stakeholders. The quality of information transmitted and the joint participation by partners in planning and goal setting send important signals to the trading parties (Powell, 1987).

However, while joint participation enables both parties to better understand the strategic choices facing each other, such openness is not natural for management who must develop communication skills and learn to adapt their traditional concern for decision autonomy (Mohr and Spekman, 1994). Research looking at the implications of contract management (compared to multi-stakeholder partnerships) identify contractual collaboration as a 'hollow partnership model', in which the terms of contract are prioritised over the scope of the engagement (Maxwell and Riddell, 1998). It occurs that contractual engagement carries the risk of being unilateral, driven by buyers and generally lacking mutual benefits for organisations' suppliers.

P2P (or business-to-business) engagement has been studied in hospitality in the context of the sharing economy (Liu and Ma, 2020; Lin et al, 2022). Using social exchange theory reveals that P2P facilitates the exchange of various functional and social resources underpinned by reciprocity, whereby one party repays the positive or negative actions of another party (Liu and Ma, 2020). According to Lin et al. (2019), the salient characteristics of P2P engagement are reciprocity and dispersed beneficiaries (Lin et al., 2019) which facilitate their function. Reciprocity indicates that partners can contribute and benefit within P2P engagement. P2P engagement reflects networked patterns and can benefit any agent in the network, rather than being limited to only an organisation. Actors engaged in P2P collaborations can strengthen their regulatory function at both the individual and the collective level (Koch, 2020; Lin et al., 2019; 2022)

Meanwhile, Transactional Partnership refers to the investment of business actors in the expertise provided by external actors to address the issues the organisation faces (Thompson and Brent, 2017; Sockett, 1997; Woolthuis, Hillebrand and Nooteboom, 2005; Thompson and Jesiek, 2017). This approach to partnership offers a distinct interpretation of businesses' engagement with external actors aimed at addressing issues that are not primarily focused on profitability. Transactional Partnerships, studied largely in educational and civic engagement contexts, are defined by Enos and Morton (2003: 24) as 'instrumental, designed to complete a task with no greater plan or promise' (Thompson and Jesiek, 2017). Similar to Contractual Partnerships, this approach to partnership is characterised by a strong unilateral quality of engagement (Sockett, 1997) and opportunistic behaviour (Woolthuis, et al. 2005; Thompson and Jesiek, 2017). This means that activities carry the risk of one-sidedness, meaning that certain industry actors benefit from the interaction or activity and that this engagement is not mutually beneficial for all partners (Clayton et al., 2010; Thompson and Brent, 2017). The degree of unilateral transactional engagement can vary considerably depending on the membership and interests of stakeholders engaged.

To address the unilateral quality of engagement, a cooperative approach to transactional partnerships is advised (Feinstein and Meshoulam, 2014). Research indicates the importance of acknowledging differences in interests and organisational cultures of partners engaged (Feinstein and Meshoulam, 2014). This means that organisations driven by profitability are likely to reinforce boundaries which can lead to unilateral transactional engagement. In contrast, external organisations that rely on collaborative approaches to function tend to 'blur the boundaries' between stakeholders and create ways to involve all participants in the functioning of the organisation (Clayton et al., 2010; Thompson and Brent, 2017). This blurring of boundaries leads to cooperative and communal activities and interactions.

3.3 Partnership and Stakeholder Theory

In this section, I review Partnership and Stakeholder Theories and combine them to develop a conceptual framework. The two mainstream theories are integrated by considering theoretical implications of stakeholder engagement and initiatives to address MS. To achieve the research aim and objectives, the conceptual framework is later used to evaluate collaborative practices and partner engagement to address MS in the event sector. In line with the abductive approach, the conceptual framework is revised after completing the first stage of data analysis in Chapter 5. Partnership theory (McQuaid, 2000; Mohr and Spekman, 1994) is employed to identify appropriate mechanisms and collaborative practices applicable to addressing MS in the event sector, while recognising that players have distinct interests and different levels of commitment. Partnership theory has been extensively used in multi-disciplinary studies on crime prevention, urban regeneration, and economic development to explore how organisations can develop compatible goals, strive for mutual benefits, and gain competitive advantage in the marketplace; the theory has also been used to assess the profitability of organisations (Powell, 1987; Mohr and Spekman, 1994).

Stakeholder theory (Donaldson and Preston, 1995; Freeman et al, 2018) is brought in to explore how different categories of stakeholders perceive the risks of MS and their own roles in addressing it. Stakeholder theory is one of the main theoretical frameworks generated by business and social sciences research and has gained most attention beyond the study of organisations in other management disciplines. In events studies, stakeholder theory has been used to identify categories of stakeholders, as illustrated later in this chapter. It explores the environment in which event actors operate and the strategies they employ (Getz 2010, 2016). The two theories have not yet been applied in the context of MS in the field of events, nor have they been used together in other fields. The two theories allow to explore and theorise the dynamics of partner engagement and collaborative practices to address MS in the event sector. The conceptual framework also carries methodological implications discussed in the next chapter.

3.3.1 Partnership Theory

Partnership theory developed by McQuaid (2000) defines partnerships as *purposive, strategic, and cooperative relationships* between two or more organisations who share *compatible goals*, strive for *mutual benefit*, and acknowledge a high level of *mutual interdependence* (McQuaid, 2000; Hatton and Schroeder, 2007). Organisations join efforts to achieve goals they could not easily attain individually. The formation of these partnerships is motivated primarily by gaining competitive advantage in the marketplace (Bleeke and Ernst, 1991; Powell, 1987; Mohr and Spekman, 1994). When it involves multiple actors with diverse interests, a partnership can also be referred to as a coalition or collaboration (Roth, 1996; Rosenbaum, 2002). Practical evidence of anti-slavery networks across the UK offers comprehensive practical guidance for stakeholders seeking to develop partnerships tailored to the desired outcomes of engagement and coupled with examples of other such initiatives in the UK (Nottingham Rights Lab, 2022). This evidence of practical engagement reviewed earlier in this chapter is included along with theoretical framing of partnership in the development of the conceptual framework.

As seen in earlier sections of the literature review, developing shared interests and goals labelled as ‘synergy’ and ‘joint development’ is not always possible within PPPs and MaPs (Klijn and Teisman, 2003). The quality of information transmitted and the joint participation of members in planning and goal setting inform the collective outcome (Powell, 1987). The outcome is a clear separation of responsibilities in which actors concentrate on their own tasks. As a result, researchers have questioned the success of PPPs (Klijn and Teisman, 2003; Mohr and Spekman, 1994). In their research Mohr and Spekman (1994) use two indicators of partnership success: an *objective indicator* assessing the profitability of the engagement and an *effective measure* to assess the level of satisfaction of those engaged. While profitability and therefore the objective indicator might not be relevant to partnerships seeking to prevent MS, it does relate to the performance management systems that partnerships require. Performance management in the partnership context can be defined as a strategic and integrated operational approach to delivering successful outcomes (Nottingham Rights Lab, 2018a). Meanwhile, measuring effective performance management is achieved through joint review and evaluation protocols and joint performance indicators.

The effective measure employed to assess the level of satisfaction of those engaged is explored through partnership characteristics that distinguish partnerships from conventional business relationships (Borys and Jemison, 1989): different levels of *commitment and trust* (Salmond and Spekman, 1986); *communication strategies* and information sharing between partners (Mohr and Spekman, 1994); and *conflict resolution techniques*, which aim to solve problems collectively as opposed to dominating the relationship or ignoring the problems. Partnership theory has become the organisational strategy of choice in business. The popularity of partnership is rooted in its perceived mutual benefits (Hatton and Schroeder, 2007). As seen in previous sections of this chapter, multi-disciplinary studies on partnership underline several approaches. Partnership scholarship on addressing complex issues suggests MaPs, PPPs, and P2P collaborations as the best suited approaches to address MS. Organisational studies exploring profitability and economic development identify Transactional and Contractual Partnerships as the preferred approaches for businesses. These approaches are integrated into the conceptual framework to explore and theorise the role partnership can play in addressing MS in the field of events.

Characteristics of ‘partnership success’, or what has more recently been called ‘meaningful partnership engagement’ (Buhmann, 2020), have been identified and studied in the context of increasing competitive advantage and profitability of organisations. Findings suggest that *trust*, the willingness to *coordinate activities*, and the ability to convey a *sense of commitment* to the relationship are central to the success of a partnership (Mohr, 1994). Critical also to partnership success are the *communications* strategies used by the parties. McQuaid (2000), suggests the use of conflict resolution techniques to reduce the risk of *opportunistic behaviour*, a frequent barrier in the development of successful partnerships. Opportunistic behaviour can influence access to knowledge and information among partners, influence the depth and breadth of interaction, and capture the complex and dynamic interchange between partners, leading to negative consequences for all partners (McQuaid, 2000; Clayton et al., 2010; Thompson and Brent, 2017). Extant literature has focused on *commitment*, *coordination*, *interdependence*, and *trust* as important attributes of partnerships. The existence of these characteristics implies that partners acknowledge their mutual dependence and their willingness to work for the survival of the relationship (Mohr and Spekman, 1994). Partnership theory provides a range of tools for partnership development that have been applied in the

context of urban regeneration and economic development. Five main dimensions of partnership have been identified (McQuaid, 2000). I adapt and integrate these five dimensions in the conceptual framework to advance knowledge on the role of partnerships to address MS:

a) what is the partnership seeking to achieve: its purpose and whether it is strategic, or project driven (to explore the *outcomes* or partnerships against MS: prevention, protection or prosecution)

b) who is involved: the key actors/stakeholders and the structure of their relationship in the partnership (to map stakeholders likely to be engaged in partnerships against MS and identify their *membership* and *leadership*).

c) the timing or stage of development of the partnership process and changing relationships and activities over time (to understand the *development* of partnerships against MS).

d) the spatial dimension (to explore the *geographical reach* of partnerships against MS).

e) how the activities are carried out, the implementation mechanisms (to explore partnership *approach*).

Partnership theory has been used as a ‘social contract’ or facilitator between leisure studies and the larger society (Uhlir, 2008). No evidence is found that the theory has been used in relation to MS or HT; however, the theory has been used to investigate the nature and causes of crime and drug abuse in creating comprehensive crime prevention coalitions and PPPs (Klijn and Teisman, 2003), which may be of relevance to use the theory in exploring response to complex issues such as MS. In addition, I use the five dimensions of partnership along with core characteristics of partnership to explore industry sectors perspectives on the role of partnership in the field of events as indicated in Table 3.1.

Partnership Theory	Implications for Partnership to address MS
Performance Management	Strategic and integrated operational approach to delivering successful outcomes. Measured through joint review, evaluation protocols, and joint key performance indicators (KPIs).
Commitment & Trust	Willingness to coordinate activities; transparency;
Input & Interdependence	Joint participation of members in planning and goal setting; informs collective outcomes; compatible goals; strive for mutual benefit;
Shared Interest	Members' ability to engage in conflict resolution

Table 3.1. Partnership Theory

3.3.2 Stakeholder Theory

Stakeholder theory is deemed one of the main theoretical frameworks generated by business and social sciences research and can be regarded as a theory that has gained most attention beyond the study of organisations in other management disciplines. It relates to the wide environment of people or entities that can impact or be impacted by an organisation's actions (Freeman et al, 2018). Stakeholder theory stresses the interaction of *power*, *legitimacy*, and *urgency* in creating overall salience (Mitchell, Agle, and Wood, 1997). The theory argues that

a stakeholder engaged in a relationship with other actors has *power* ‘to the extent that it has or can gain access to coercive, utilitarian, or normative means to impose its will in the relationship’ (p. 865). *Legitimacy* is defined by Suchman (1995 p. 574) as ‘a generalised perception or assumption that the actions of an entity are desirable, proper, or appropriate within some socially constructed system of norms, values, beliefs, and definitions’. *Urgency* is defined as ‘the degree to which stakeholder claims call for immediate attention’ (Mitchell et al 1997, p. 867); overall stakeholder *salience* according to these authors is a function of all three stakeholder attributes, or in practice is ‘the degree to which managers give priority to competing stakeholder claims’ (p. 869). Donaldson and Preston (1995) argue that the theory has multiple distinct aspects that are mutually supportive: descriptive, instrumental, and normative, as follows:

a) The *descriptive approach* is used in research to explain the characteristics and behaviours of organisations, including how companies are managed, how the directors and managers perceive their roles, and the nature of the organisation itself. In the development of partnerships that address MS this approach can inform who is engaged and what their actions entail. In this research, I use the descriptive approach to map the stakeholders engaged in partnership and reveal the *membership* and *leadership* of partnerships against MS.

b) The *instrumental approach* explores the connections between the management of stakeholder groups and the achievement of corporate goals. Within the development of partnerships against MS this approach explores the rationale for partnership engagement, which leads to a better understanding of partnership *outcomes*.

c) The *normative approach*, identified as the core of the theory by Donaldson and Preston (1995), examines the function of the organisation and identifies the moral or philosophical guidelines for the operation and management of the corporation. This informs the different approaches to developing and managing partnerships.

To date, stakeholder theory has not been applied in studying MS. For the purpose of this research, I use the core components of Stakeholder theory (as indicated in Table 3.2.) to compare the views of different categories of stakeholders and to explore their perception of risks associated with MS and their perceived individual or collective role in addressing it.

Stakeholder Theory	Implications for Partnership to address MS
Leadership and Power	Stakeholders’ role in coordination and implementation of policies and practises; stakeholders’ roles in partnership development and level of engagement;
Urgency	Swift action: perceived risks associated with MS; desired outcomes of collaboration;
Legitimacy	Moral versus legal liability; the socio-political context and the drivers stakeholders respond to, including the industry’s response to the MSA. Managerial and ethical perspectives (CSR and HRM): compliance, responsibility, accountability.
Salience	Shared goals and priorities among stakeholders, leading to potential disengagement, conflict resolution, and opportunistic behaviour (barriers to partnership engagement).

Table 3.2 Stakeholder Theory

3.3.2.1 Mapping Key Stakeholders in Events

Literature about stakeholders in events concentrates mainly on the practical aspects of event management, operations, and delivery (Bowdin et al 2012; Carlsen and Andersson, 2011). In events studies, stakeholder theory (Freeman et al, 2018; Donaldson and Preston, 1995) is used to identify categories of stakeholders, to analyse the environment in which event actors operate, and the strategies they employ (Getz 2010; Getz and Andersson, 2010). Researchers have applied the theory to demonstrate the relevance of actors engaged in event planning in understanding both the environment in which events operate and the strategies they employ (Getz 2010, Getz and Andersson, 2010). Furthermore, it is argued that stakeholder theory has important theoretical implications for understanding how festivals and events get started, develop, potentially fail, or become permanent institutions.

Common studies that apply stakeholder theory include planning processes, assessments of successful events, event attendee motivation, the nature of event tourism, and creating a return on investment (Dowson and Bassett, 2015; Quinn, 2013). In recent years, however, this has started to shift with the emergence of events studies and more critical perspectives, which acknowledge the role of stakeholders such as community members (Getz, 2016). Event sector stakeholders include individuals and groups both inside and outside the organisation, that have some direct interest in the event's planning, production, and implementation, or in participating in it. They are broadly classified as internal or external stakeholders (Bowdin et al 2012; Carlsen and Andersson, 2011; Dowson and Bassett, 2015; Quinn, 2013). According to Getz and Andersson (2010), event stakeholders are classified as listed in Table 3.3.

Internal Stakeholders	External Stakeholders
<u>event planners</u> : event owners, event management companies, event organisers, partners, sponsors, funders and investors;	<u>regulatory bodies</u> : local authority/municipality, licensing authorities, police, local/central government and their departmental agencies;
<u>employees and workforce</u> : volunteers, contracted crew, and staff supplied by contractors or labour hire firms;	<u>community</u> : local community and neighbourhood including indigenous people, NGOs, media, protestors
<u>supply chain</u> : venues, product and service suppliers, transport operators, telecommunications and IT companies, interpreters and translators, construction companies, textile and garments producers, restaurants and catering services, event insurance specialists.	<u>event participants</u> : speakers, performers, athletes, exhibitors, contestants, traders
	<u>attendees</u> : customers, audience, fans, spectators, visitors, delegates

Table 3.3. Internal and external stakeholders in events (Getz and Andersson, 2010)

However, in exploring different categories of stakeholders, research has mainly investigated relationships between internal event stakeholders such as managers, employees, and volunteers. Goldblatt (2010) examines this relationship to identify the essential attributes for an event manager and finds that vision and leadership are the most important, closely followed by adaptability, good communication skills, and people management skills. However, factors like seasonal, migrant, and agency workers, or even volunteers, are overlooked and 'employees' are generally viewed as contracted permanent workers, which is not representative for the industry, due to its high reliance on seasonal workers (Stevenson and Cole, 2018; Paraskevas and Brookes, 2018a). This carries significant consequences in

assessing the risks arising from MS, yet it lacks representation in scholarship. Abson (2017) recognises that seasonality plays a role in the relationship between event managers and 'employees' and finds that event managers lack trust in their staff and prefer to 'get things done' themselves. Neither of these studies, however, explores how corporate leadership is perceived by direct and outsourced employees nor the impact of seasonality on recruitment and the approach of sub-contracting entry-level workers. Furthermore, corporate leadership and power dynamics can play vital roles in the development of partnerships (Roth, 1996).

Getz and Anderson (2010) apply stakeholder theory in classifying events stakeholders into different categories and concludes that often such categories (namely internal and external stakeholders) have conflicting interests. The use of stakeholder theory in mapping (conflicting) interests of internal and external actors, has motivated me to employ this theory in investigating both the *membership* and the *role* of partnership based on the perspectives of internal and external actors from events. Stakeholders in the field of events have previously been investigated to distinguish their roles in the delivery of an event. This study will take existing knowledge further by mapping stakeholders likely to be engaged in preventing MS in the UK event sector. I explore the collaboration between different categories of stakeholders, taking into account both internal and external stakeholders to advance understanding of the role and implications of partnerships to address MS in the field.

3.3.3 Conceptual framework

Developed from integrating Partnership and Stakeholder Theories the Conceptual Framework (depicted in Figure 3.1.) seeks to identify and present in a logical format the key factors relating to partnership development against MS in the UK event sector. The framework illustrates the relationships between the concepts that have been selected to represent stakeholder engagement and partnership development against MS noted in Table 3.1. and 3.2.

The key concepts that emerge from integrating Partnership and Stakeholder Theories are *Outcomes*, *Membership*, *Leadership*, *Approach*, *Geographical reach*, and *Barriers*. These key concepts are defined as general representations of the phenomena (Veal, 2006) and placed at the core of this research (illustrated in grey circles in Figure 3.1.). They have been grouped within the framework to convey a complex idea more simply (Pearce, 2014) and to understand partnership and collaboration against MS. This research acknowledges that there is a connection between concepts derived from Partnership and Stakeholder Theories, but the direction and strength of the relationships remain to be identified and revised in the analysis process.

Based on extant literature, I identify several *approaches* to partnership (MaP, PPP, P2P, Contractual Partnerships, and Transactional Partnerships). These approaches are informed by scholarship on partnership to address complex issues, including MS and crime prevention (Nottingham Rights Lab, 2022; 2018; Liu et al., 2014; Mohr and Spekman, 1994; Prenzler, 2012), coupled with business and organisation studies exploring partnerships seeking corporate advantage, profitability, and competitive advantages (Lambert, Knemeyer, and Gardner, 2008; Powell, 1987; Thompson and Brent, 2017; Sockett, 1997). I use evidence of anti-slavery partnership engagement in the UK along with the RightsLab Partnership Toolkit (Nottingham Rights Lab, 2018b) to determine the *outcomes* of partnerships to address MS. This enables me to link the outcomes of partnerships to three level approaches under the

Palermo Protocol (UN, 2000) of *prevention, protection, and prosecution*. Partnership research and theoretical framing also informed *barriers to partnership development*.

In addition to the *key concepts* scholarship examining labour and human rights in events in the previous chapter led to identifying *industry characteristics* (depicted in green boxes in *Figure 3.1.*). These include *reliance on labour providers, seasonal and transitory, working conditions, and complex supply chains*. The industry characteristics are introduced to the Conceptual Framework to represent the *context* under which stakeholders internal and external to event organisations operate in. I employ the Conceptual Framework as a foundation for this empirical research in evaluating the role partnerships play in addressing MS from the perspectives of stakeholders in the UK event sector, to obtain a fuller understanding of the rationale for partnership development and the dynamics of partnership engagement to address MS in the event sector using Partnership and Stakeholder Theory.

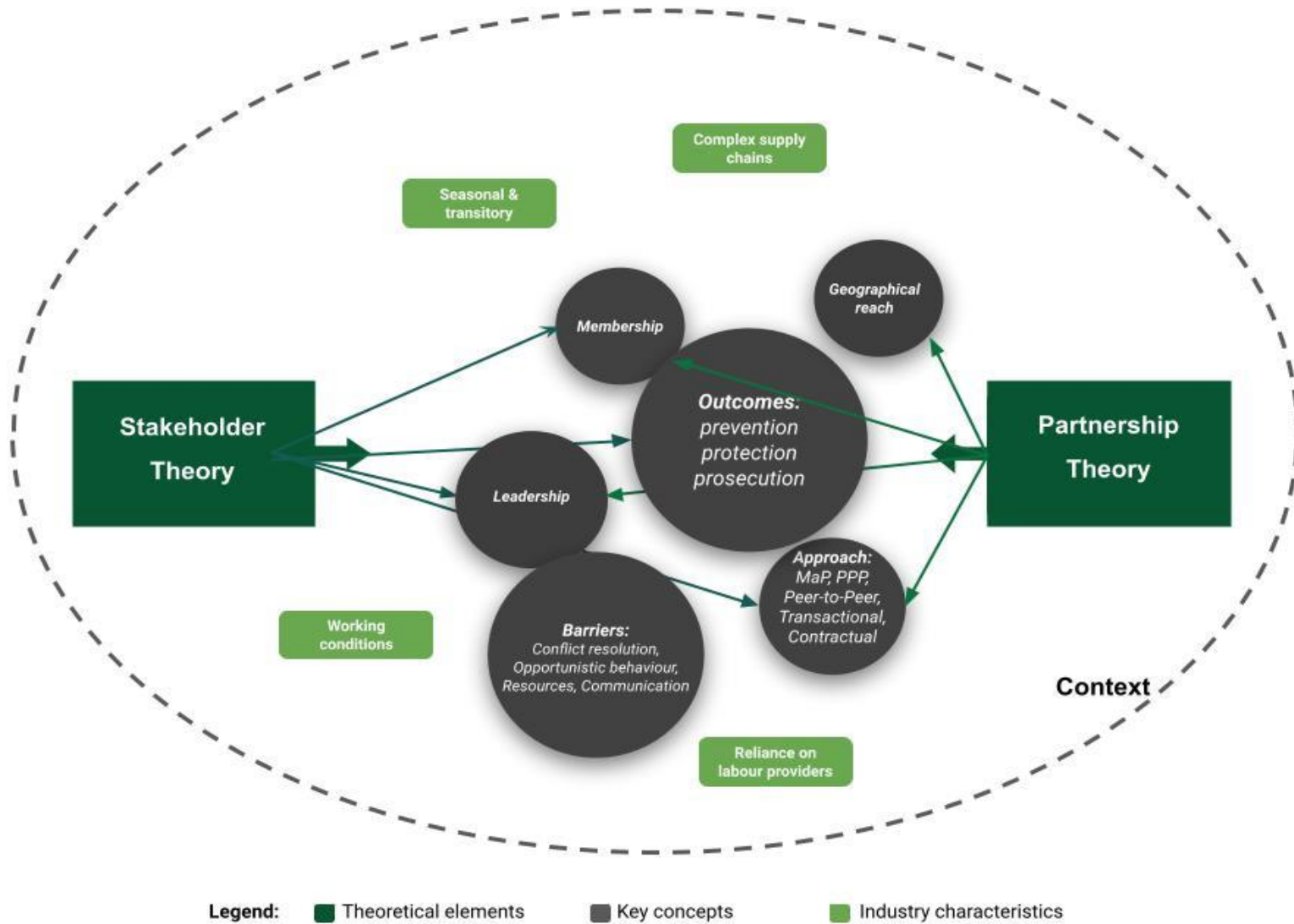


Figure 3.1 Conceptual Framework

3.4 Conclusion

This chapter demonstrates that partnership scholarship is currently fragmented: research exploring partnerships to address MS and other complex issues seldom explores the implications of including businesses in such collaborations (Osborne, 2000; Liu et al., 2014; Mohr and Spekman, 1994; Prenzler, 2012; Goyal and Mishra, 2016; Klijn and Teisman, 2003; Christ and Burritt, 2018). In contrast, studies concerning partnerships that include businesses predominantly focus on corporate interests, profitability, and competitive advantages (Shin, Park, and Park, 2019; Yam and Chan, 2015; Koch, 2020; Lin et al., 2019). This study aims to bridge this gap and look specifically at the role of private actors from events companies in their engagement with external actors to address MS.

This is of particular interest, because of the prevalence of MS in business and the risks it poses to the event sector. While the literature reviewed in Chapter 2 highlighted the complexity of MS and the limitations of current solutions and legal frameworks to address it or to affect changes to corporate practices, this chapter argues for further research and theorisation of potential solutions that partnerships appear to offer to address MS and other complex issues. To address the gaps in knowledge identified throughout this chapter, this study seeks to explore the role of partnership to address MS based on the perspectives of stakeholders in the event sector. Furthermore, this research informs debates on MS and the events field on the question of MS by taking a broader lens that covers all events companies and suppliers and considers all types of exploitation that can occur in a business context.

This research explores collaboration between different categories of stakeholders to advance understanding on partnership development to address MS in this sector, by looking at how and why stakeholders develop partnerships to address MS in the field of events. To this end, I develop a Conceptual Framework by reviewing and combining Partnership and Stakeholder Theories. I review distinct approaches to partnership and integrate them within the Conceptual Framework which is used as a foundation to interpret multiple datasets.

4 Methodology

4.1 Introduction

This chapter presents the methodology and how it enables me to investigate partnership development against modern slavery (MS) in the UK event sector. The aim of this research is to explore the role partnerships can play in addressing modern slavery from the perspectives of stakeholders in the UK event sector. This chapter is structured, as follows: *research philosophy* outlines the ontology and epistemology underpinning this research project; the *research design* presents the qualitative narrative inquiry and rationale. It introduces narrative approach as a way to explore the socially constructed nature of the phenomenon and presents the data selection criteria for documents and interviews respectively. *The Labovian model of narrative analysis* outlines the analysis process: interpreting collective reporting (resulting from documents) and individual experiences (lived experience and personal reflections shared during interviews). Finally, I discuss the study *evaluation and limitations*.

4.2 Research Philosophy

Research philosophy refers to the assumptions and beliefs about developing knowledge (Saunders, Lewis and Thornhill, 2017; Altinay, Paraskevas and Jang, 2016; Riessman 2002; Cassell, Radcliffe and Malik, 2020). These assumptions shape the understanding and development of my research aim and objectives and methodological choices, leading to how I interpret my findings (Saunders et al, 2017; Creswell, 2018). To understand research philosophy and develop the research design, I consider Saunders' (2017) objectivism-subjectivism dimension and political-ideological orientation, and I reflect on what constitutes 'acceptable and desirable knowledge' (Riessman, 1993). In doing so, I familiarise myself with research philosophies within social sciences and business management and I consider my philosophical stance to understand how my own principles align to broader paradigms and how this influences my practical considerations and philosophical choices (Saunders et al, 2017). This led me to a constructivist ontology and interpretivist epistemology.

Reflexivity, subjectivity, and constructivism

Subjectivism incorporates assumptions that reality is a social construct based on perceptions and actions of social actors. Ontologically, subjectivism embraces that the order and structures of a phenomenon are created by researchers and by social actors through use of language, conceptual categories, perceptions, and actions (Saunders et al, 2017). It disputes underlying reality beyond what individuals attribute to it, and, because each person experiences and perceives reality differently, it discusses multiple realities rather than a single reality that is the same for everyone (Burrell and Morgan, 2016).

Another dimension that guides this research philosophy relates to the political or ideological orientation between regulation and radical change (Burrell and Morgan, 2016; Saunders et al, 2017). Within the regulation perspective researchers argue the need for regulation of societies and human behaviour based on an underlying unity and cohesiveness of societal systems and structures (Burrell and Morgan, 2016). Consistent with business and management research which suggest how organisational affairs may be improved based on current approaches, rather than radically challenging the current position (Burrell and Morgan, 2016; Saunders et al, 2017), this study seeks to understand the role of partnership based on the perspectives on

social actors. A primary focus of research undertaken within this paradigm is the way individuals attempt to make sense of the world and to understand the fundamental meanings attached to organisational life while considering multiple subjectivities (Saunders et al, 2017; Creswell, 2018).

I adopt an empathetic stance and attempt to enter the social world of research participants to understand it from their perspectives (Plummer, 1995; Czarniawska, 2004; Riessman 2002). Not only is the business response to MS complex but it is unique in the context of events, where it reflects a particular set of circumstances, the characteristics of the event sector, and interactions involving individuals coming together. As noted in the introductory chapter, throughout the study, I reflect on my assumptions and beliefs which influence my approach to research and acknowledge that they conform to broader paradigms (Crotty, 1998; Riessman 2002; Cassell et. al, 2020). I identify several assumptions: firstly, that individuals engage with their world and make sense of it based on their beliefs and social perspectives (Crotty, 1998; Burrell and Morgan, 2016), therefore this research seeks to understand the perspectives of participants through gathering information and interpreting their context, interpretation shaped by my own experiences and background. Secondly that meaning is social, arising from interaction with an individual, organisation or community (Creswell, 2018; Clarke and Braun, 2013), but also that meaning is constructed by individuals as they engage with the world they are interpreting (Creswell, 2018; Crotty, 1998). This leads to designing the research as a qualitative study and asking semi-structured open-ended topical questions to encourage participants to share their views (Czarniawska, 2004; Riessman 2002).

4.2.1 Ontology

Ontology is concerned with assumptions about the nature of reality (Saunders et al, 2017; Altinay et al. 2015; Creswell, 2018). Constructivism, also framed as constructionism (Saunders et al, 2017) or social constructivism (Creswell, 2018), argues that reality is constructed through social interaction in which individuals create partially shared meanings and realities. Thus, from the constructivist perspective, reality is constructed intersubjectively (Saunders et al, 2017). The constructivist ontology underpinning this project seeks to understand participants' meaning making within the context of MS in the field of events. It explores how key actors construct reality using language and narratives (Creswell, 2018; Czarniawska, 2004).

The ontology determines my understanding of business and management as a context and the power dynamics that govern participants' interactions (Saunders et al, 2015). Individuals develop subjective meanings of their experiences of MS in events. These meanings are varied and multiple, leading me to explore and understand the complexity of views rather than narrowing meanings into predetermined categories or ideas (Creswell, 2018; Crotty, 1998). Therefore, my goal is to rely as much as possible on participants' views of MS. This means asking broad and general questions to allow participants to construct the meaning of MS, mechanisms to address it, and the role of partnership. Subjectivity comes into play in different opinions and narratives that can help to account for different social realities of different social actors. This study adopts the subjectivist view that business response to addressing MS and to engaging in partnership is constructed through the social interactions between key actors. As the social interaction between actors is a continual process, the research phenomenon is fluid and in constant change (Creswell, 2018; Saunders et al, 2015). Crucial to the

constructivist philosophy is that the researcher has to study participants' context in detail, including historical, geographical, organisational, and socio-cultural contexts in order to understand how realities are being experienced (Saunders et al, 2015).

4.2.2 Epistemology

Epistemology refers to assumptions about what constitutes acceptable, valid, and legitimate knowledge (Riessman, 2002), and how knowledge is communicated to others (Saunders, 2017; Burrell and Morgan, 2016). The interpretivist paradigm develops from a subjectivist perspective as an 'antidote' to positivism (Riessman, 2002). Interpretivism argues that 'different people of different cultural backgrounds, under different circumstances, and at different times make different meanings' (Saunders et al, 2015: 149). It holds the assumption that knowledge is not absolute or complete but shaped by culture and society (Saunders et al, 2015; Crotty 1998; Riessman, 2002) organisational roles and context (Saunders et al, 2015; Creswell, 2018; Czarniawska, 2004; Clarke and Braun, 2013). This means that differences that lead to the complexity of MS are not simply contained to organisational roles; although, those from different backgrounds may experience environments, systems, or events in different ways. Thus, interpretations of MS and the mechanisms to address it can differ between organisational or social contexts.

The interpretivist epistemology emphasises the importance of language, culture, and history (Crotty 1998) in shaping interpretations and experiences of MS within an organisational and social context. With its focus on complexity, richness, multiple interpretations and meaning-making, interpretivism is explicitly subjectivist, with an axiological implication that my interpretation of data, and thus my own values and beliefs, play an important role in the research process (Crotty 1998). Consistent with the interpretivist paradigm the purpose of this research is to create new, richer understandings, and interpretations of social worlds and contexts (Cassell et. al, 2020; Riessman, 2002; Czarniawska, 2004), this means looking at the role partnership can play from the perspectives of different groups of people and understanding their experiences within organisational and social contexts (Saunders et al, 2015; Creswell, 2018).

4.3 Research Design

This research explores the role partnerships can play in addressing modern slavery from the perspectives of stakeholders in the UK event sector. To achieve the research aim, the study is designed as a constructivist qualitative study (Yanow, 2015). The constructivist ontology and interpretivist epistemology underpinning this project seek to understand participants' meaning making within the context of MS in the field of events and perceptions of MS in the field of events. It explores how key actors construct reality using language and narratives (Creswell, 2018; Czarniawska, 2004). This methodology enables me to gain an in-depth understanding of the actions taken by stakeholders to address MS in the UK events sector, through the review of primary data sources. I structure the study into two distinct stages: 1) a document analysis of Modern Slavery Statements (MSS) sourced from the Modern Slavery Registry (BHRRC, 2019) and UK events companies followed by 2) semi-structured stakeholder interviews (Figure 4.1.).

I use an abductive approach (Creswell, 2018; Saunders et al, 2015) and qualitative research methods (Altinay et al. 2015; Creswell, 2018; Czarniawska, 2004). The abductive approach is the most suitable reasoning to the constructivist philosophy underpinning this research project (Creswell, 2018; Plummer, 1995). It enables me to review and combine Partnership and Stakeholder Theories into a conceptual framework to explore and theorise the dynamics of partner engagement and collaborative practices to address MS in the event sector. The conceptual framework introduced in *Chapter 3* seeks to identify and present in a logical format the key factors relating to partnership development against MS in the UK event sector (Hatton and Schroeder, 2007); the framework depicts the relationships between key concepts that have been selected to represent stakeholder engagement and partnership development against MS. After the first stage of this research, I refine the core concepts and the relationships that tie them and present a Revised Conceptual Framework, as seen in *Chapter 5*. The refined conceptual framework is then used to analyse data emerging from the second stage of research to explore stakeholders' perspectives on partnerships to address MS and their rationale for those partnerships.

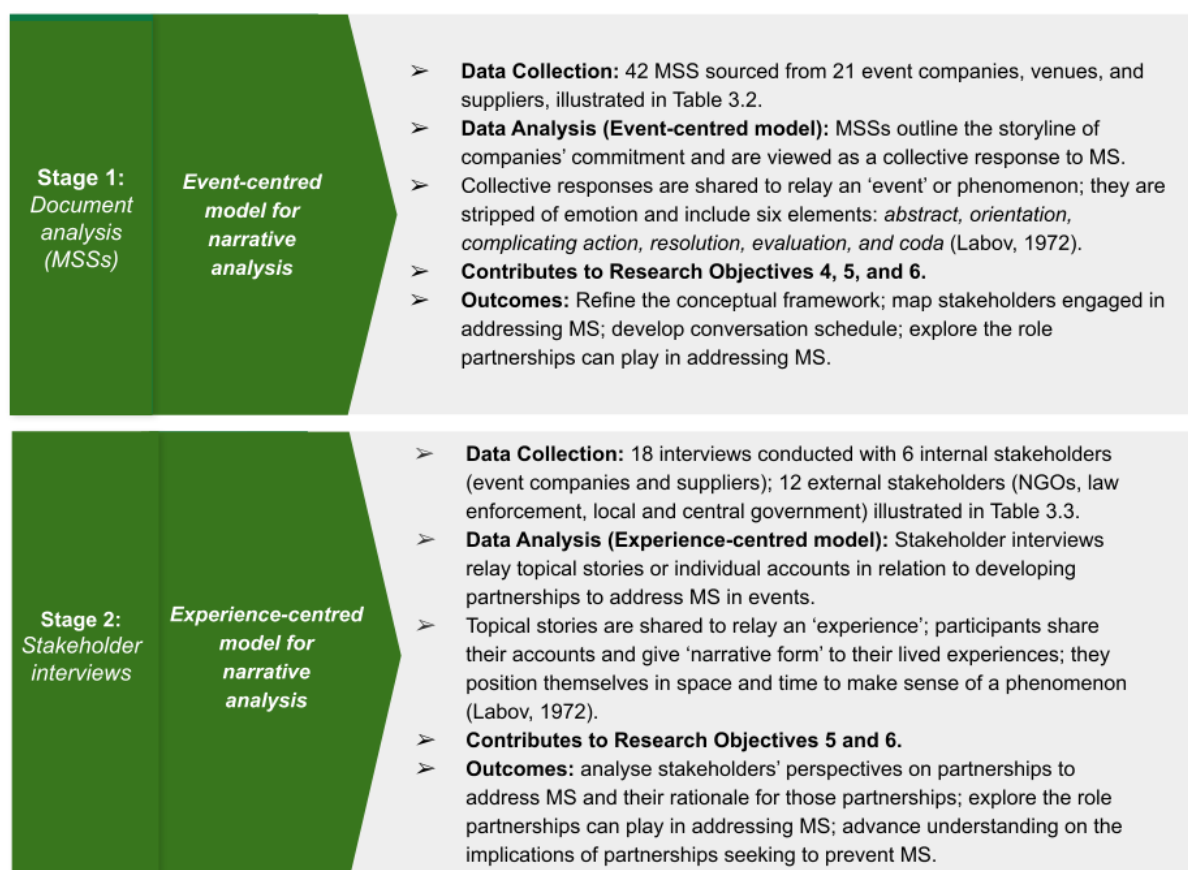


Figure 4.1. Research Design

4.3.1 Qualitative Narrative Inquiry and Rationale

The constructivist ontology and interpretivist epistemology emphasise plurality and contextuality. These viewpoints led me to a narrative approach to study collective reporting and individual experience of engaging in partnership to address MS in the British event sector.

I use a narrative approach to explore the socially constructed nature of the phenomenon where stories play a role in the ways individuals as well as companies construct reality (Plummer, 1995; Czarniawska, 2004). Within the narrative approach, I use narrative analysis as a technique to interpret the primary data collected from event companies and elicited during interviews. Narrative analysis, as a technique, is concerned with understanding how and why speakers communicate their experiences as a story or a series of stories (Andrews et al, 2000; Riessman 2002; Czarniawska, 2004).

There is a long tradition of using a narrative approach in disciplines such as psychology, history, sociology, philosophy, literacy research, and linguistics (Riessman 2002; Elliot 2005; Plummer, 1995). More recently, there has been a growing interest in utilising it in business research (Cassell et. al, 2020). The term narrative is widely used in social research to describe a form of expression (in discourse or writing) that aims to relay an event or communicate an experience (Labov and Waletzky, 1997; Labov, 2002; Riessman 2002). Aside from its use in social sciences, narrative is also a term frequently used in popular discourse, to indicate biographical patterns or a temporal and causal progression in a cultural form of films or novels (Labov and Waletzky, 1997; Czarniawska, 2004).

Labov and Waletzky (1997: 21) define a narrative as 'any sequence of clauses that contains at least one temporal juncture', meaning that a narrative requires temporality, context, and an implied relation or action that leads or causes another. Labov has also argued that a narrative is a 'theory of causality', providing not only description but also explanation (1997; 2002). A narrative is a means of accounting for events or experiences that balances the reportability that makes a story worth telling with credibility. Therefore, the term narrative is used in research to signify short causal sentences (Labov and Waletzky, 1997), stories shared by individuals and organisations (Riessman 1993; Elliot 2005; Plummer, 1995), but also in a broader sense when referring to discourse (Andrews et al, 2000; Riessman 2002; Czarniawska, 2004).

The terms story and narrative are often used interchangeably in narrative research (Labov and Waletzky, 1997; Riessman 2002; Elliot 2005; Plummer, 1995). For the purpose of this research, I use the term narrative to refer to the reconstructed narratives resulting from the analysis of documents and interviews, consistent with the broader interpretation of the term (Andrews et al, 2000; Riessman 1993; Czarniawska, 1997; 2004). The five narratives that emerge from the analysis of MSS and interviews portray the underlying descriptions and interpretations of MS that lead to distinct ways of responding to MS, and distinct interpretations of the role of partnership (Labov 1997; 2002).

Within narrative research, stories can mean 'topical' stories that are restricted to relaying a specific event or moment in time (Labov, 1972; Czarniawska, 2004; Lieblich, Tuval-Mashiach and Zilber, 1998), as well as personal or 'entire life' stories which encompass extended accounts of individuals' lives or even their biographies. In the context of this research, modern slavery statements (MSS) and interviews relay topical stories. The MSSs outline the storyline of companies' commitment and are viewed as a collective response to MS. They reflect how MS is perceived by senior actors within event organisations involved in their production. While participant interviews relay topical stories or individual accounts of stakeholders in relation to developing partnerships to address MS in events. The overlap between the individual accounts (collected through interviews) and the collective responses (corporate documents produced by event sector companies) further enforces the importance of analysing the social

context within which they are produced as a means of sharing knowledge (Cassell et. al, 2020), especially among events companies facing similar risks arising from MS and requirements to report under the Modern Slavery Act (2015).

Research participants are often described as storytellers or narrators (Labov, 2002; Mishler, 1991), however, given that the interviews are designed to elicit topical stories, for the purpose of this research I predominantly use the term research participant, although I also refer to them as internal/ external stakeholders or actors at times. The goal of interviewing in narrative research is to generate detailed accounts rather than brief answers or general statements (Riessman, 2002). The topical stories individuals share about a particular issue reflect how that issue is viewed in society (Czarniawska, 2004) and informs participants' perspectives and meaning (Yanow, 2015).

4.3.2 Modern Slavery Statements

The first stage of this research reviews information available in the public domain reported by events companies about their responses to MS using this data to refine the conceptual framework. Findings from document analysis are also used to map stakeholders engaged in addressing modern slavery in the UK events sector.

I opt for document analysis because corporate documents and artefacts provide data on formal expression in relation to the research phenomenon (Mason, 2002). MSS are viewed as social constructs of how the organisations generating them perceive MS and how they view their role and responsibilities in addressing it (Brown, 2006), by reporting their policies and processes against MS. Corporate documents (in this case MSSs) are viewed as the collective voice of the company (Brown, 2006). However, given how the statements are produced and who is involved in the process, they reflect the collective sense-making among a given set of senior organisational actors. MSS are therefore scripted or strategically written (Mishler, 1991) to inform the public about the identity of the company. MSS are created with an agenda to demonstrate companies' compliance with the MSA, their concern about MS, the actions taken to prevent it from occurring, and the fact that they are prepared to report on those actions. While they might not reflect the views of all individuals in the organisation, the MSS provide supplementary research data and inform on the context within which stakeholders operate (Bowen, 2009).

The storyline within the MSS is scripted (Elliot, 2005), this means it is produced and often revisited by a number of key (senior) actors to reflect the identity the organisation wants to portray (Elliot 2005; Plummer, 1995). It is important to note that different groups within an organisation may tell different stories about themselves and the organisation in which they are embedded (Brown, 2006). Therefore, while the MSSs produced by organisations are collectively constructed (Brown, 2006), they may not reflect the identities of all individuals within that organisation (Elliot 2005). In analysing the MSSs, I investigate multiple dimensions: the context in which they are constructed, why they are produced, by whom, and for whom, as well as the implications that may result from their publication, intended and unintended (Mason, 2002). This element of the methodology enables me to view the way in which companies engage with the concept of MS in general and explore partnerships as defined in these published statements to play a significant role in addressing MS risks.

Selection Criteria

To identify and select the MSSs, I use purposive selection (Polkinghorne, 2005). I select organisations that report under the MSA, the steps undertaken to address MS and HT in their own operations and their supply chains (HM Government, 2015). The chosen companies are involved in delivering a broad range of business events, festivals, and cultural events, as well as large-scale events; they operate in the UK (an internationally), and each has an annual turnover of over £36 million and are therefore required to report under the MSA (HM Government, 2015).

All documents are downloaded from publicly available sources: events companies' websites and the Modern Slavery Registry, designed and administered at the time by the Business and Human Rights Resource Centre (Modern Slavery Registry, 2019); since then, the UK Government has launched its own central registry of modern slavery statements in 2021. I conduct a series of web searches and consult industry publications (Events Industry Board, 2018) to identify which UK and international companies fulfil the reporting criteria (HM Government, 2015). The initial sample consisted of over 50 companies operating in the UK. Of those, I only select companies that produced a MSS, detailed below in *Table 4.1*.

To maintain an accurate record of sourcing the statements and their accessibility, I made a series of notes on whether they are available on the company home page as instructed by the Home Office Statutory Guideline (HM Government, 2017). Data gathering and analysis becomes a complex and organic process: as I collect MSS, I assess their availability, frequency of updating, and board approval. Therefore, meaning-making occurs throughout the research process rather than being a separate activity carried out after data collection (Gehart et al 2007).

To classify the companies, I use industry publications (Getz and Anderson, 2016; Eventbrite, 2018) and the UK Standard Industrial Classification of Economic Activities (a condensed list of codes with a description of the companies' nature of business available on the government website). At the core of the research are:

- a. *Event management companies* also referred to as *event production companies, events organisations or event planning companies* ¹
- b. *Event venues*: hotels, conference centres, sports arenas and private parks ²
- c. *Event suppliers* ³.

An initial concern considered in sourcing the documents was that analysing the statements may prove insufficient in providing the necessary information required to address the research aim and objectives. This is partly due to the fact that some documents may only provide a small amount of data, while others may be incomplete, inaccurate or inconsistent, and also given the lack of strict guidance on producing MSS recommended by the government (HM Government, 2015). Therefore, I evaluate the quality of the statements early on in the sampling process to identify potential challenges or gaps in the documents and consider reviewing additional documents (Bowen, 2009) such as CSR reports, although this was deemed unnecessary given the richness of data revealed by the available statements.

As of 2015, the Modern Slavery Act requires companies to publish a statement. Therefore, at the time of analysis (late 2019 early 2020), each company should have produced a minimum

¹ SIC codes: 82301, 82302, 90020, 90040

² SIC codes: 55100, 90020, 90040

³ SIC codes: 56210; 78200

of three statements. However, this is not the case for most companies: a total of 42 MSSs are sourced from 21 companies required to report under the MSA. Three of the selected companies adhere to the Home Office Statutory Guideline recommendation to keep previous statements on the company website to showcase improvements in successive annual reporting. Where available, statements from previous years are supplemented from the Modern Slavery Registry, however not all companies are listed on the registry, which is a potential limitation in analysing the construction of the companies' anti-slavery response over time.

Companies Classification		Most Recent MS Statement
Event Management Companies	Capita Travel & Events	2019
	CWT	2018
	Clarion Events	2019
	Glastonbury Festival Events LTD	2019
	ITE Group PLC	2019
	Jack Morton Worldwide	2018
	Layer123 Events & Training Limited	2019
Event Venues	Accor	2019
	AELTC - Wimbledon	2019
	Bowl Events & Waterpark	2017
	Hilton	2018
	IHG	2016
	The O2 Arena	2019
	NEC Group	2019
	SMG Europe	2018
	Venue Elixir	2018
	Whitbread	2019
Event Suppliers: Catering and Staffing	Admirable Crichton	2018
	Compass Group	2019
	CH&CO	2019
	Rhubarb	2017

Table 4.1. MSS from event companies and suppliers

The findings from MSS analysis lead to refining the conceptual framework and support the mapping of stakeholders in the events sector. Furthermore, the data arising from documents provides essential information to develop the conversation schedule for the subsequent fieldwork (Creswell, 2018; Polkinghorne 2005).

4.3.3 Stakeholder Interviews

The second stage of this research consists of stakeholder interviews. The aim of stakeholder interviews is to examine participants' perspectives on partnerships to address MS and their rationale for those partnerships by exploring the type of partnerships they are involved in or seek to develop, their reasons to organise in such partnerships, and the processes they follow. I opt for interviews because they are the most suitable tool in qualitative research (Saunders et al, 2019; Polkinghorne 2005) for in-depth exploration of the role partnerships can play in addressing MS from the perspectives of stakeholders in the UK event sector (Yanow, 2015).

I conduct semi-structured interviews with stakeholders engaged in addressing MS in the UK events sector. Interviews are conducted in person and via Zoom, Teams, or Google Meets in line with the social distancing and working from home regulations during the COVID-19 pandemic. In contrast to data collected in stage one (MSSs), which is scripted and reflects the collective accounts of stakeholders involved in their production, interview participants share a unique individual topical story (Labov, 1972; Czarniawska, 1997; Liebllich, 1998), often referred to as participants' accounts within this research. As participants reflect on past and current experiences of working in or with the industry, data collection is detached from the experiences participants relay (whether this is related to internal processes to address MS or interaction with key stakeholders). This is further accentuated by the timing and location of the interviews conducted largely online, from participants' homes, during the pandemic which caused many to be furloughed.

Participants' experiences relate to their work in preventing MS, their experience in or with the events sector, the policies and processes which informs their work, and the types of partnerships they envisage for their organisations. Participants reflect on the definition and implications of MS and express their thoughts, values, and beliefs. In line with Labov (2002) and Mishler's (1992) views of narrative research, I consider speech and language closely linked to individual experiences. Because several participants reference written materials they produce and use within their practice to address MS, I also look at the documents mentioned to further understand participants' construction and meaning-making. Such written work is also crucial to understand the social conditions of participants' experience (Tamboukou, 2003).

To explore meaning-making I look beyond the content and context of their accounts. I include participants' and my own reflections (notes or comments made during the interviews or written reflections noted in my diary immediately after each interview). I also consider 'hard-to-transcribe' fragments, contradictions, and gaps within participants' accounts, as well as the paralanguage (tone, pauses, repetitions) and I use ellipses to mark pauses and hesitations in their speech (Andrews, 2004). In analysing the interviews, I acknowledge the interactions and role of the research participant as a storyteller and myself as a listener (De Fina & Georgakopoulou, 2015), including communicating before and after the interview, introducing the research objectives in the recruitment stage, and asking questions during the interview.

Selection Criteria and Participant Recruitment

The analysis of MSSs allowed me to map stakeholders engaged in addressing MS in the UK events sector. This enables me to target internal and external actors, including a) decision makers and recruitment managers in events, b) decision makers and recruitment managers

in event venues and suppliers, c) local authority and central government representatives, d) MS consultants, e) law enforcement and investigative partners, and f) NGO representatives.

Data collection took place between December 2019 and December 2020. Interviews were suspended between April and July 2020 due to the Covid-19 outbreak and resumed in line with government guidelines. I conducted a total of 18 audio recorded semi-structured interviews with six internal and 12 external stakeholders, ranging in length from 40 to 80 minutes with an average duration of 55 minutes. Participants' roles, organisations, and pseudonyms are listed in *Table 4.2*. Access was facilitated through modern slavery and human rights networks (Modern Slavery Research Consortium; Innovation Forum; Sustainable Event Alliance; Institute for Human Rights and Business) and industry contacts, using a snowballing technique to extend access (Denzin and Lincoln, 2011; Creswell, 2018). Prior to the main part of the fieldwork, I conducted a pilot study with three external stakeholders to assess the interview schedule, expose any potential issues and implement solutions (Denzin and Lincoln, 2011). As a result, I adapted the recruitment messages and the participant information sheet to include some examples of the questions that were to be discussed during the interviews. This in turn increased the participation rate.

I ran the recruitment process targeting internal and external stakeholders in parallel. The recruitment of *external stakeholders* targeted: NGO representatives and MS Consultants, local and central government actors, law enforcement, and investigative partners. The response rate was one in three, and the snowballing technique proved successful with external stakeholders. At the same time, I targeted *internal stakeholders* (HR directors and managers, supply chain managers, and event planners) from the organisations that produced the MSSs analysed in the first stage of this research. The response rate was one in 15 and it did not result in any interviews. I therefore decided to expand my recruitment criteria and include participants from CSR, procurement, and communications departments. Additionally, I included a wider range of organisations (events companies, venues, events staffing, and catering agencies) that were not under a legal obligation to produce a MSS. The response rate improved to one in seven; however, most stakeholders who responded explained they were not in a capacity to engage due to their lack of expertise in the subject thus declining to engage in the study: *'This looks like very interesting and important work and I am very happy to be involved, although I must admit that I've never been involved in any work on modern slavery within the hospitality or events sectors and therefore don't know whether I can be of much help with this. I wonder whether it would be best to speak directly with the trade associations for these sectors instead'*. Although I explained that their industry insight would be valuable to the study even if they lacked MS expertise they were not persuaded. Several companies attributed their lack of availability to engage in the study to the seasonal nature of the sector: *'Due to the nature of the festival, much of the team are not currently based on site and are elsewhere working on other projects so we cannot guarantee responses unfortunately'*. Experience and availability were also an issue for several external stakeholders who were knowledgeable on MS prevention but lacked expertise in the field of events. Nonetheless, they were eager to engage in the study. This in turn evidenced a difference in attitude towards the study from internal stakeholders.

I used participants' reasons for refusing to engage as well as literature on reluctance to engage in research to further adapt the recruitment message. Success in gaining interviews is often credited to ensuring that potential participants are given a clear and concise overview of the project aims, examples of questions they would be asked in an interview, and the reason they

were asked to participate (Goldstein, 2017; Harvey, 2011). One suggested strategy to overcome any reluctance to participate was to accentuate the degree to which the research and the events industry would benefit from the unique insights that a participant may have (Harvey, 2011). I stressed in the recruitment message that the study aimed to advance understanding of the role of partnership in addressing MS in the event sector which would be made available to participants.

Despite adapting the recruitment process, the only strategy that resulted in interviews with internal stakeholders was facilitated through gatekeepers. Referrals provided by industry contacts and a snowballing technique prompted by some external actors who had taken part in the research project themselves. This prompted me to reflect on *trust* as a key factor deterring participants from engaging in a study presented to them by someone unknown to them. Participants from the events sector who were introduced to the study by a contact they knew and trusted were happy to engage in the research project despite having little or no experience in MS prevention and very little awareness of MS in events. Gaining access to internal stakeholders required a high level of adaptability and perseverance. Although the largest recruitment efforts were on engaging internal stakeholders, only a third of the participants in this study are from event organisations as detailed in *Table 4.3*.

Difficulties in access and recruitment are not uncommon in a demographic group that is underrepresented in social science research (Deane et al., 2019; Polkinghorne 2005). The issue is particularly pronounced when the research topic is sensitive or potentially politicised (Deane et al., 2019). Therefore, recruitment difficulties were not unexpected particularly given the lack of research on MS in events and the level of reporting in accordance with the MSA in the industry. However, the process of recruiting internal stakeholders was more time-consuming and frustrating than expected. Challenges to data collection reflect the lack of integration of MS in events organisations as well as the sensitivity of the topic.

EXTERNAL STAKEHOLDERS	INTERNAL STAKEHOLDERS
<u>MS Consultants:</u> Patrick - Practice and Policy Coordinator (4y) (Industry expertise: Retail and Hospitality) Richard - Chief Executive (10+ y) (Industry expertise: Food and Agriculture) Simon - Modern Slavery Advisor (3y) Leah - Programme Director (3y) (Industry expertise: Hospitality and Events)	<u>Events - Venues:</u> Karla - HR Manager Employee Relations(3y) (Previous role in different hotel: HR Advisor Recruitment and Training) Rachel - Procurement and Compliance Manager (6y) (previous roles: graduate scheme covering employee relations, supply chain management and procurement)

<u>NGOs:</u> Sarah - Manager (6y) (Industry expertise: Tourism and Hospitality) Jane - Project Manager (3y) (Industry expertise: Tourism and Hospitality) Andrew - Research Officer (<1y) (Previous role: Operations and Communications Assistant)	<u>Events - Staffing agency:</u> Mark - Compliance Manager (3y) Emilia - Senior Account Manager with Recruitment Responsibilities (8y) (Previous roles: experience working as casual worker in hospitality and events) Amma - HR Director (10+ y) (previous roles: HR Manager, HR Assistant, Administrative, experience working as casual worker in hospitality and events)
<u>Law Enforcement:</u> Martin - Head of MS Prevention (10+ y) Peter - Chief Inspector (5y)	<u>Event Planning:</u> Holly - Staffing coordinator (6 years) (Previous roles in multiple events companies: Digital Recruitment Manager; Recruitment and Payroll Assistant)
<u>Local & Central Government:</u> Claire - Risk and Exploitation Coordinator (10+ y) Local Authority (Previous role: Adult Safeguarding Coordinator) Nicole - Prevention Strategy and Business Engagement (3y) Susan - Victim and Partnership Lead (<1y)(Previous role: Law enforcement - Crime Prevention Unit)	<u>Events suppliers - Catering:</u> n/a

Table 4.2. Research Participants

4.3.4 Ethical considerations

This research has been reviewed and approved by the Oxford Brookes University Ethics Committee (Appendix 2). Given the sensitivity of undertaking MS research, this methodology carried two main ethical implications concerning participant recruitment and data protection. Prior to the fieldwork, in line with the University Ethics procedure I engaged in risk management procedures to assess and mitigate potential risks to participants and ensure data protection.

The main concern given the sensitivity of this topic was guarding research participants from any potential physical and especially psychological harm. I designed the conversation schedule to not include commercially and politically sensitive questions. However, questions concerning MS and exploitative practices in businesses and supply chains that are potentially sensitive (Conti et al, 2007) were necessary to achieve the research aim. Conducting MS research can carry serious ethical implications for research participants and researchers alike (Crane, et al, 2021; Gold, Trautrim and Trodd, 2015). To guard participants against psychological harm and avoid any risks or traumas associated with exploitation, this research does not target individuals deemed vulnerable to MS or MS survivors, nor do I ask for

information concerning victims of MS and HT. Still, provisions were made should participants raise concerns about experiencing or witnessing incidents of MS to direct them to first responders listed by the National Referral Mechanism (NRM) and encourage them to contact one of the authorities listed. Although this was not the case in any of the interviews, I was prepared to explain the referral process; that the authority would produce a report and provide appropriate guidance in dealing with the risks, that they would ensure protection to the potential victim, and that the case would then be passed to the NRM. To reduce potential physical risks to the participants and the researcher the interviews were scheduled during daytime, either at the participants' place of work, in a suitable public space, or online.

To ensure research participants were informed on the nature of the topic and their role in the study, I included a Participant Information Sheet (Appendix 3.2) in all my communication with potential research participants. The Participant Information Sheet provides details on the purpose of the study, targeted participants, and rationale for participant recruitment based on their roles in events or in addressing MS. It informs all targeted participants (decision makers and recruitment managers in events, local authority and central government representatives, MS consultants, law enforcement and investigative partners, and NGO representatives). It also informs participants on the use of data and disseminating findings (in the form of the thesis and subsequent publications). More importantly, to address ethical considerations related to the balance of power and transparency (Riessman, 1993; Conti et al, 2007), it stresses that participation is entirely voluntary, and participants can withdraw from the study at any time without providing reasons.

A second concern regarded data protection. In line with the EU GDPR introduced into UK law as the Data Protection Act (2018), research participants were adequately informed about why they were providing information, how it would be used, and who would have access to it (Harvey, 2011; Data Protection Act, 2018). A Privacy Notice was created for the study and shared with all participants. Furthermore, participant details are anonymised, and no details of individual participants are attributed anywhere in the research data. An audio recording of the interviews was taken with participants' consent. All materials were made available to participants upon request. The audio recording, transcripts, and all other materials related to the study were encrypted and stored on password protected computers. A copy of the files was saved on Google drive, for which the University has a security agreement. This secures a backup for all files in case of any IT issues or damages to my personal computer while also allowing me access to the files on campus and remotely.

Finally, an unforeseen ethical implication occurred due to the outbreak of the Covid-19 Pandemic and subsequent lockdowns. This led to a period of uncertainty and lack of job security for many of the research participants particularly those internal to events. Given these circumstances, contacting potential research participants was deemed insensitive, therefore I suspended the interviews in April 2020 and resumed data collection in July 2020 in line with government guidelines.

4.4 The Labovian Model of Narrative Analysis

Within the narrative approach used to achieve the research aim and objectives I use narrative analysis as a technique to interpret the data. Employing narrative analysis is a novel analytical method to evaluate the role partnerships play in addressing MS from the perspectives of

stakeholders in the UK event sector. Narrative analysis is an appropriate interpretive lens through which to understand how and why participants communicate their experiences (Andrews et al, 2000; Riessman 2002) and the processes of organising and reporting (Riessman 2002; Czarniawska, 2004). It treats stories as knowledge, which constitutes ‘the social reality of the narrator’ (Etherington, 2004:81). It conveys the perspective of the person or organisation producing it in its depth, messiness, richness, and texture. This inevitably included issues of identity and the interaction between the research participants, organisations, and audiences (Czarniawska, 2004; Labov and Waletzky, 1997). I used *the Labovian model of narrative analysis* (1972) to interpret both collective reporting (outlined in the MSS) and individual experiences (lived experience and personal reflections shared through interviews). I use an event-centred model to interpret the MSS and I adopt the experience-centred model for interviews (Labov, 1972). According to Labov (1972) ‘event’ and ‘experience’ are two distinct elements of narratives on which stories are constructed. Although it is further argued that the two realms cannot be entirely separated (Czarniawska, 2004; Labov and Waletzky, 1997). I followed Plummer (1995) and Labov’s views according to which narratives are strategic, functional, and purposeful, produced to achieve certain ends, providing not only description but also explanation (1997; 2002).

4.4.1 Event-centred model for narrative analysis

According to Labov (1972) event-centred narratives are shared to relay an event or phenomenon; they are stripped of emotion and structured based on six elements that usually appear in the following order: *abstract, orientation, complicating action, resolution, evaluation, and coda*. The six elements of the Labovian model are reflected in the structure of MSSs produced by organisations as follows: abstract (introducing and defining MS), orientation (organisational context and company structure), complicating action (the risks arising from MS), evaluation (mitigating and managing the risk of MS), resolution (performance management), and coda (attributing internal responsibility).

To analyse the MSS, I focus on the statements’ *form, content, and performance* to gain insight into ‘what’ is said and ‘how’ it is said (Riessman, 1993; Elliot, 2005). I also examine the end to which the documents are produced (Riessman, 1993; Plummer, 1995). In the analysis process, I read the statements several times and keep notes of concepts derived from the Home Office Statutory Guidance for Transparency in Supply Chains (TiSC Guidance) (HM Government, 2017) and reflected on the statements’ form, content, and performance:

1st Read: analyse content, structure, language using TiSC Guidance; look for evidence of engagement with stakeholders and partners.

2nd Read: identify what the statement is seeking to accomplish; identify good practices using TiSC Guidance, the conceptual framework, and good practice models from other industries; make notes on key findings and reflect on the statement as a whole.

3rd Read: identify what is missing; use the findings to refine the conceptual framework and identify areas to be explored in-depth during the interviews.

To analyse the MSSs, I enter the entire text of the most recent MSS from each company (21 statements in total listed in *Table 4.1.*) into NVivo, the qualitative data management programme, and I code each section of the statements using extracts from the MSS, concepts

derived from the TiSC Guidance (HM Government, 2017), and the conceptual framework. I map the six elements of event centred narratives (Labov, 1972) to identify any links across statements. I then read the MSS a final time to understand how the organisations' storyline unfolds in each statement. In addition, I compare the most up-to-date MSS to previous ones and note any changes in language, content, and structure (Clarke and Braun, 2013).

In analysing the *form* of MSS, I examine the structure of the six elements of the Labovian model, the language, and terminology. This enriches the analysis by providing insights into the functions of different elements within the MSS (Labov, 1972; Riessman 1993; Elliot 2005). Analysing the language of MSSs offers further insights into what the statement is seeking to accomplish (Yanow, 2015; Elliot, 2005). In analysing the *content*, I situate the MSSs in the regulatory context of the MSA which triggered their production and use the TiSC Guidance in the analysis process. The purpose of this is to establish the level of detail shared by companies. The content of MSS includes concrete information (i.e., identifying risks and detailing policies and processes to mitigate those risks); while the underlying or latent content allows me to explore the meaning and importance of reporting for the organisations producing them including what they are seeking to accomplish (Riessman 1993; Yanow, 2015). I investigate multiple aspects including the context in which the statements are produced, the purpose they aim to achieve, as well as the consequences they carry, whether intended or unintended (Mason, 2002). The three dimensions (form, content, and performance) allow me to explore how the threat of MS is perceived as companies outline the storyline of their commitment and their identity in responding to it. Using the Labovian model, I explore the MSS to answer the following questions:

Abstract and orientation: How is MS perceived and defined? What actions are taken to address it? What is the context of reporting? and what is the company structure?

These questions enable me to explore the performance of MSS, how companies respond to MS and the implications this carries for their organisation. The performance of MSS refers to the interaction between the companies producing the statements and the audience. According to Brown (2006) organisations produce documents and other artefacts with specific audiences in mind, and therefore tend to tell different stories to different audiences (Brown, 2006). Furthermore, different audiences interpret the statements differently. Therefore, the MSS are produced from a particular point of view, for a particular audience, and are thus imbued with motive (Brown, 2006). The organisations produce the MSSs with the intended or actual external audiences in mind. Companies are aware that they are assessed by the public, investors, the media and other external parties who represent the audience of the statement. The Home Office TiSC Guidance (2017) leads to believe that the audience expects to see practical progress and improvements on how they are tackling the risks and incidence of MS in their operations and supply chains. The abstract and orientation provided insight into the institutional context in which MSSs are produced, recounted, and consumed (Riessman 2002). While the company structure exposes risks associated with the company operation (franchising models, subcontracting labour).

Complicating action, evaluation and resolution: How do companies perceive the risks of MS? How are risks managed and mitigated? And how is performance measured?

To explore risk, I evaluate the MSS against the TiSC Guidance (2017) which contains information for companies to demonstrate compliance with the minimum requirements

referring to: *when the statement should be published, how frequently it should be updated, who should approve it, and where it should be published* (compliance to which is noted in Chapter 5). Although the Guidance does not dictate in detail what MSSs must include or how they should be structured, it does provide a non-exhaustive list of information that may be included⁴. It is important to note that the TiSC Guidance stipulates the minimum reporting requirements for which it has been heavily criticised by MS scholars and NGOs for lack of robust monitoring and devolving responsibility to business (Christ and Burritt, 2018; LeBaron and Rühmkorf 2017; Nolan and Bott 2018; Stevenson and Cole, 2018). Criticism of the TiSC Guidance relates to the fact that organisations are not expected to guarantee that all their supply chains are 'slavery free' (HM Government, 2017). Instead, statements should describe the main actions the organisation has taken during the financial year to deal with MS risks in their supply chains and their own business. If the organisation has taken no steps to deal with modern slavery risks, they must still publish a statement stating this to be the case. Evaluating the MSS against the Home Office TiSC Guidance allows me to identify further questions to be explored in interviews concerning internal processes and the MSS production. This section of the MSSs and the level of detail informs companies' attitudes to reporting and what 'the statements seek to accomplish' (Riessman 1993; Yanow, 2015): companies that take pride in reporting are prepared to acknowledge the shortcomings of the industry: *'labour-intensive and largely local', 'part-time, agency and casual workers are more typical than the traditional full-time employees'*. These companies are better at identifying specific risks, and more concerned with the impact their business has on their employees, supply chain workers, and local communities.

Coda: Who is responsible for producing the statement, for developing policies and for implementing and measuring the policies?

The final sections of the MSS enable me to map stakeholders engaged in addressing MS in the UK events sector, their roles, and responsibilities in addressing MS, and on a few isolated occasions their engagement in partnership. The final section also reflects companies' commitment to report progress made in the following financial year which again directly communicates to the audience. Concepts that emerged from document analysis included: *commitment, zero-tolerance, leadership, responsibility and accountability, partnership development, performance management, training, awareness, and education*. Findings resulting from MSS analysis are presented in Chapter Four.

4.4.2 Experience-centred model for narrative analysis

I adopt the experience-centred model for narrative analysis (Czarniawska, 2004; Labov, 1972) to analyse key stakeholders' perspectives on partnerships to address MS and their rationale for those partnerships. According to Labov and Waletzky (1997) and Czarniawska (2004) experience centred narratives are shared to relay an 'experience'. Participants share their accounts and give 'narrative form' to lived experiences, by positioning themselves in space and time to make sense of a phenomenon (Labov and Waletzky, 1997). Thus, it can be argued that their accounts attempted to explain MS by exploring why things are the way they are or have become the way they are (Labov and Waletzky, 1997). This analysis provides a rich,

⁴ *Organisation structure and supply chains; Policies in relation to slavery and human trafficking; Due diligence processes; Risk assessment and management; Key performance indicators to measure effectiveness of steps being taken; Training on modern slavery and trafficking*

detailed, and complex account of the participants' experiences. I focused on content and how it unfolds, as well as the participants' contexts to gain insight into both 'what' and 'how' is said (Labov, 1972; Riessman, 1993). Analysing participants' accounts is a methodical process that overlaps to a large extent with data collection and continues throughout the writing stage in becoming a harmonious process (Clandinin and Connelly, 2000). The interviewing process was designed to elicit topical stories (Czarniawska, 2004) by asking appropriate questions after explaining the aim of the study to the participants (Cassell, 2020). I start by introducing the research project and ask participants to speak about their role. Prompted by open-ended questions, the conversation flows from their area of expertise to how they perceive MS and the risks specific to events and hospitality, the policies and processes they engage with, and the role of partnership in addressing those risks, without following a specific order.

In the early stages of interpreting the data (while I was still conducting interviews) I begin by listening to the participants' accounts to familiarise myself with the data and to identify anything and everything of relevance to the research aim and objectives within the entire dataset (Czarniawska, 2004; Riessman, 1993). The narrative approach emphasises the advantages of listening to the stories rather than reading the transcripts in becoming familiar with the data (Clandinin and Connelly, 2004; Riessman, 1993). I make notes and reflect on the key points and broader concepts and discuss them with supervisors and peers. Upon finalising data collection, I transcribe the interviews and I read the transcripts and other data sources generated from interviews (interview diary, documents shared by participants, and websites they referenced). Reading the transcripts several times and interrogating the data results in identifying key concepts used in the coding process (Cassell et al, 2020) such as: *contextual experience of different categories of stakeholders, reflection on specific risks, reputational damage, conflicting interests, moral and legal liability, limitation in relationship building, transparency etc.*

The content of participants' accounts is explored as a form of pattern recognition within the data, with emerging concepts becoming the categories for analysis (Riessman, 1993; Clarke and Braun, 2013). While language underpins the approach of exploring how event sector stakeholders perceive MS and the risks or issues the industry is facing (Riessman, 1993). Using NVivo Software, I use a complete coding and category construction technique commonly used in thematic narrative analysis (Riessman, 1993; Clarke and Braun, 2013). The process involves a careful, more focused re-reading and review of the data and performing coding and category construction across cases (Riessman, 1993), to uncover themes or categories pertinent to partnership development and collaborative initiatives (Clarke and Braun, 2013). I label the categories that captured the essence of why a particular bit of data may be potentially relevant to partnership development based on the participants' experience. Consistent with the abductive approach, coding is based on some of the key concepts derived from the conceptual framework including *leadership, power, urgency, interest, trust, communication*; while other codes emerge from the participants' accounts: *transparency, corporate agenda, conflicting interests, company reputation, competition, stakeholder relationship development, motivation and reasoning, specific risks identification, limitations*. Upon reviewing the codes, I categorise them and identify linkages (Clarke and Braun, 2013). It is at this stage that key concepts emerge (*distance, passion, flexibility, leadership, power dynamics*). I define, name, and map the concepts to explore *what* participants say and *how* they expressed themselves in relation to MS. The coding and analysis process are exemplified in *Appendices 5 and 6*.

I listen to each participants' account and further interrogate the data by comparing their experiences to identify differences and similarities. I draft individual pen portraits for the 18 participants engaged in the study. I start with their role, type of organisation, and professional background. I consider their views on MS (risks, implications for the industry and UK businesses, and their awareness of MS prior to interview). I explore ideas and concepts that emerged from discussions with each participant using a set of questions:

What is the emotional tone conveyed by participant's accounts?

The experiences participants share in the interviews are emotionally charged. They reflect participants' meaning-making not only on the issue of MS in events, but also on how they perceive the industry and the organisations they are embedded in. They speak about their work, their individual experiences, their thoughts, feelings, and beliefs and express passion for human rights, for the industry, and for taking action against MS. During the discussion some participants express shame when reflecting on how little is done to prevent MS. Others express sadness when talking about the number of people who suffer from exploitation worldwide. The emotions of the participants are also evocative in the language they use to express themselves and their motives to engage in the research. Several participants explain they engaged in this research project because they *'felt that it was important to contribute to an area of under-developed research'*. Even participants with limited experience of MS in events explain they agreed to take part *because* the issue is new to them. They want to *do the right thing* and share any information that might be useful.

In exploring the emotional tone of participants' accounts I also reflect on my own emotions in relation to the phenomenon and the participants. Unlike other forms of social research, eliciting and listening to topical stories prompts the researcher to engage emotionally with the participant (Cassell et al., 2020). I am not indifferent to the experiences shared by participants. During the interviews I attempt to set aside my own viewpoints and refrain from making judgements on the participants' display of the 'right' course of action in addressing MS in events. However, when listening to and reading the interviews, I realise that I inevitably engage emotionally with what is being said and make demands through probing and asking particular follow-up questions to explore participants' reasoning and motivations.

What is the essence of their account?

I follow how participants' accounts unfold to map *how participants perceive MS, what risks they identify, how MS might impact their organisation and their industry and how they (could) develop partnerships with external actors*. As the interviews are semi-structured, my line of questioning follows the topics referenced by participants rather than the question order (Creswell, 2018). Although I ask follow-up questions to gain further detail, I allow participants to speak freely. This interviewing style allows me to identify what participants prioritise in their roles and in the measures, they deem necessary to address MS (Czarniawska, 2004; Riessman, 1993).

How do individual accounts relate to others collected as part of this research?

I reflect on participants' nuanced responses and a level of contradictions expressed particularly by internal stakeholders whose answers often include a collective dynamic (*we, our company, our team, our organisation*) reflecting the views of the company they are embedded in which, to some extent, contradicts their individual reflections and experiences (*I*

feel, I believe, I think). I listen to the recorded interviews and read the transcripts several times focusing on content to explore *shared attitudes to MS, participants' motivation to engage in anti-slavery partnerships and the language they used*. This enables me to group participants based on what they say and how they express their views on MS and partnership development.

What is missing from their accounts?

Listening to participants' accounts and reading the transcripts several times focusing on content also evidences differences over participants' priorities, their interest, and the sense of urgency they believe that MS poses to the industry. This becomes evident when comparing the individual accounts to understand participants' attitudes towards MS, specific preventative measures, and their approaches/reactions to partnership development. They are further differentiated by the language and terminology used to frame those issues and thus their meaning-making (Czarniawska, 2004; Riessman, 1993). The fact that some participants overlook some aspects deemed of high importance by others also illustrates the implications of awareness and differences in conceptualising MS based on the level of engagement with the industry. This is particularly evident in identifying specific risks and types of exploitation that can occur within hospitality and events companies within the UK.

Upon drafting the pen portraits, guided by the questions above, participants' attitudes towards partnership engagement at the time of the interview and arrange them around an imaginary table for a partnership discussion, as illustrated in *Figure 4.2*. Karla, Emilia, Holly, and Amma are seated farthest from the table showcasing their lack of engagement and their reluctance to engage in partnerships against MS (at the time of the interview). Patrick, Sarah, Jane, Richard, Simon, Claire, Mark, and Leah have a dynamic mediator approach amongst the other actors around the table. They hold seats at the table that they occasionally leave to engage with industry stakeholders not involved in partnerships, to persuade them to join the discussion and collaborate against MS. Martin, Peter, Andrew, Rachel, Nicole, and Susan hold firm seats at the table and are less concerned with others, instead they focus on the outcomes of their discussions.

I then use this table sitting arrangement along with the pen portraits and similarities conveyed throughout participants' accounts (shared experiences, characteristics, and views on MS prevention) to group the 18 participants as seen in *Table 4.3*. Grouping participants led to reconstructing three broad narratives centred on *compliance*, *collaboration*, and *action* presented in *Chapters 6, 7, and 8* respectively. Together, these narratives provide three distinct descriptions and explanations of what MS is, where and how it occurs, and who it impacts. Following Labov's interpretation of causality (2002) the narratives illustrate how the distinct interpretations of MS lead to contrasting perspectives on industry implications, distinct rationale for action, and nuanced understanding of the role of partnerships.

Group 3: Nicole, Susan (Central Government), Martin, Peter (Law Enforcement and Investigative Partner) Andrew (NGO), Rachel (Industry stakeholder) *Focused on action and meaningful engagement - idealists*

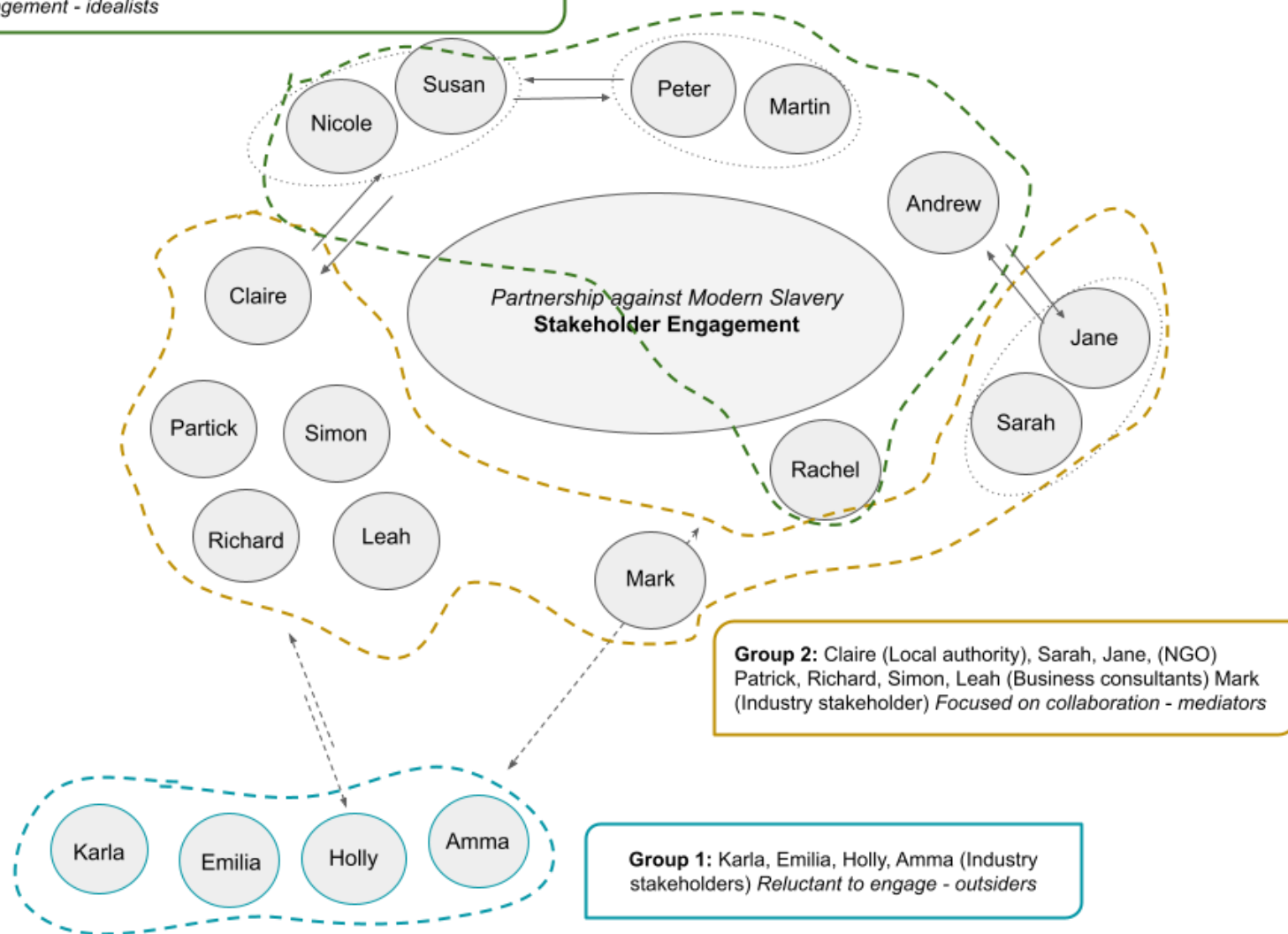


Figure 4.2. Table seating arrangements

		Group 1	Group 2	Group 3
		<i>Karla, Holly, Emilia, Amma</i>	<i>Claire, Mark, Leah, Patrick, Sarah, Jane, Richard, Simon</i>	<i>Martin, Peter, Nicole, Susan, Andrew, Rachel</i>
Participants' context	Participants' background	Industry stakeholders operating exclusive in events and hospitality; Karla (Events venue); Holly (Event planning); Emilia & Amma (Event staffing agencies)	Mark (Industry stakeholder - Staffing agency working with event/hospitality and other industries: construction, agriculture, retail); Sarah & Jane (NGO representatives - experience of working closely with events and hospitality and other sectors); Patrick, Leah, Simon & Richard (MS Consultants - experience of working closely with events and hospitality and other sectors); Claire (Local authority).	Rachel (Industry stakeholder - Supplier to event/hospitality and other industries: construction, agriculture, retail); Martin & Peter (Law enforcement); Andrew (NGO); Nicole & Susan (Central Government Stakeholders)
	Industry Engagement	Yes (operating within the industry)	Yes (operating and/or engaging within the industry)	some engagement with hospitality; very little engagement with events
Language, terminology, and implications	Participants' views on MS - What is MS? Where can it take place? Who are the vulnerable people?	MS is an issue in other countries; other industries and other business models;	MS is a human rights issue; all businesses in the industry are susceptible to risks of labour exploitation; migrant workers are particularly vulnerable;	MS is a heinous crime; businesses are susceptible to risks of labour exploitation; hospitality is particularly exposed to sexual exploitation; migrant workers, women and children are particularly vulnerable;
	MS Risks v Industry Issues	Issues in the industry (recruitment, right to work checks, break allowance, payment, employee wellbeing, duty of care)	Risks (labour standards and labour exploitation; some discussion of sexual exploitation) AND issues in industry (recruitments and labour associated issues) - participants reflect on use of language and terminology - speaking same language	sexual exploitation risks in hospitality; risks of MS in business; gig economy;
	Frequent terms used by participants	Industry issues; duty of care; wellbeing; doing the right thing; compliance; auditing; regulations; flexibility;	Human rights; industry issues; risks; labour rights; speaking the same language (communication); migrant workers; risks associated with subcontracting labour; collaboration; transparency; leadership; power dynamics;	Crime; organised crime; heinous crime; victims; Prevention and prosecution; meaningful partnership engagement; stakeholder interest; conflicting priorities; adaptability; need for action; leadership; technology; performance management

Industry implications	Business type and MS reporting for industry stakeholders within groups	Emilia, Holly & Amma - UK companies; Karla - franchise of international group. Amma's company produces MSS - not available on website Karla, Emilia, Holly - no MS reporting. High reliance on external staff (students and migrant workers on zero-hour contracts) Recruiting in the UK	Mark: UK company Annual reporting; MSS available on website High reliance on external staff (migrant and local workers on zero-hour contracts) offering option of permanent contracts after six months Recruiting in the UK and abroad	Rachel: Multinational company Annual reporting; MSS available on website High reliance on external staff (migrant workers and local workers) on temporary contracts Recruiting mainly abroad (less in the UK)
	Group views of MSA	Limited engagement with MSA - one participant involved in producing the MSS (Amma) with assistance from an external insurance company; compared MSA to GDPR unfavourably.	Criticism of MSA for lacking strength; MS reporting should be strengthened; reporting threshold to be lowered; penalties applicable to companies who fail to report or implement changes; call for accountability.	View the MSA as an opportunity to create urgency within businesses and their supply chains
	Group views of industry	Issues in the industry (recruitment, right to work checks, break allowance, payment, employee wellbeing, duty of care); optimistic view of industry gradually addressing issues.	Critical of the industry position in relation to MS; Criticise other stakeholders who prioritise sexual exploitation in hospitality; Risks and issues in the industry (labour exploitation, debt bondage, recruitment fees, working conditions, employee wellbeing);	No industry criticism; Risks of sexual exploitation in hospitality and risks of modern slavery in business (labour exploitation, debt bondage, working conditions, reliance on migrant workers, employee wellbeing)
Motivation/ Rationale for action	Engagement in addressing MS	No MS prevention in place; no mechanisms to address MS;	Awareness campaigns, training and recruitment processes, due diligence, engagement with suppliers, emphasis on collaboration and engagement with peers and external actors	Extensive policies, risk mapping, due diligence, supplier engagement, awareness campaigns; external stakeholder engagement; prevention linked to prosecution and partnership;

	Compliance, accountability and responsibility	compliance based approach	recognise that the industry is compliance driven and stress the important of holding the industry accountable - adapting MSA to include penalties for failure to report and breaches; Accountability focused	largely believe that the industry has a responsibility to drive industry practice and changes in supply chains; two participants (Martin and Peter from law enforcement) have mixed views on responsibility and accountability: while they believe businesses have a responsibility to address MS risks, they see the benefits of increasing accountability;
	Passion	passion for the industry; optimistic view of progress in the industry;	Motivated by passion for human rights; passionate about partnership and collaborations;	Passionate about victim protection, prosecution and prevention
	Internal/external drivers	External drivers: Group 1 are Reactive to legal/ industry requirements; Internal drivers: passion for industry, doing the right thing; duty of care.	External and internal drivers: Group 2 are proactive; stress the importance of businesses engaging with MS prevention and partnerships 'beyond compliance'; however, they recognise that the industry is largely reactive to external drivers and they use this in their interaction with the sector; describe the industry as being in the 'comfortable middle', and 'unwilling to become aware'; they stress the importance of increasing awareness and need for visibility; talk of industry being motivated by fear of reputational damage;	Internal drivers: Group 3 are proactive; stress the importance of businesses engaging with MS prevention and partnerships 'beyond compliance';
Partnership development and engagement	Partnership engagement	Not engaged in MS partnerships - reluctant to form partnerships. Consider engaging in potential partnerships with: clients, suppliers, and Home Office;	Peer to peer and multi-agency partnerships (local government, law enforcement, NGOs, charities, GLAA, MS scholars); Regional and national partnerships	Multi-agency partnerships Regional partnerships & national partnerships
	Views on partnership development	View partnerships as an opportunity to improve practices, increase awareness/ compliance. Peer to peer networks not of interest;	Partnerships are imperative to addressing MS and reducing risks of exploitation from businesses and their supply chains; they are actively seeking to engage with businesses in the industry in order to raise awareness and help businesses implement preventative practices.	Partnership engagement needs to be meaningful - multi-agency partnerships against MS are accountable to a variety of stakeholders including victims of modern slavery, funders, the government, and the public. Partnerships need to have performance measures in place to assess how well they have performed against their goals

	Seat at multi-stakeholder partnership table:	Outsiders - reactive and reluctant to engage; prioritises their own interest	Mediators - proactive; actively seeking to engage with outsiders and to bridge gap between experts and outsiders - focused on partnership development	Idealists /tactical group - seeks meaningful engagement with stakeholders - focused on partnership governance; some reluctance towards business;
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Table 4.3. Participant Groups

4.5 Evaluation and limitations

In line with the constructivist paradigm this qualitative study is evaluated against the following qualitative research criteria: *significance* (Tracy, 2010), *reflexivity and transparency* (Riessman, 1993), *richness and rigour* (Tracy, 2010), *truth and trustworthiness* (Riessman, 1993).

This study's significance lies in its tackling a contemporary social and policy issue of MS and practice of business responsibility developed in response to it. This topic emerges as worthy due to disciplinary priorities, timely societal events, contextual priorities and current political climates or contemporary controversies (Tracy, 2010). Evidence of its timeliness includes recent legislation against MS in the UK, characteristics of the industry and evidence from GLAA exposing the threats of MS in the field of events (GLAA, 2020), calls for industry specific research (Bales, et al. 2015), debates on human rights through the use of familiar frames of business discourse (O'Kelly, 2019). This renders the topic 'worthy' according to Tracy (2010). In addition, the research carries significant contributions at academic, methodological, and practical levels, as it aims to explore the role partnerships can play in addressing MS from the perspectives of stakeholders in the UK event sector, using a narrative approach, novel for the field.

I adopt a reflexive stance in both interpreting the findings and reconstructing the five narratives that emerge from MSSs and participant conversations. I document and acknowledge my own part in the collection and interpretation of company statements and participants' accounts to be transparent about the relational nature of the research (Riessman, 1993). This means acknowledging my position in relation to the phenomenon and the ways in which the narratives are shaped through dialogue and interpretation, as well as providing a reflexive layer to the research. To maintain a high degree of transparency throughout the research process, I document my access to the field facilitated by gatekeepers and reflect on the research context. I acknowledge the level of participation and immersion in eliciting information from participants and maintain detailed fieldnotes (Tracy, 2010). According to Tracy (2010, pp 8) transparent research is marked by 'disclosure of the study's challenges and unexpected twists and turns' which I noted throughout the research process and acknowledge in this methodology, particularly in relation to the impact of Covid-19 on participant recruitment. Tracy further argues that reflexivity and transparency are two 'valuable means by which to achieve sincerity in qualitative research' (Tracy, 2010, pp 8).

The richness of this research project is reflected in the abundant, appropriate, and complex methodological tools and approaches (Tracy, 2010). On the one hand, this is reflected in the abductive approach to designing and refining the conceptual framework by reviewing primary data in line with the research aim and objectives. Here the richness of data comes into focus in respect to MSS and stakeholder interviews, both research stages being subject to data saturation. Moreover, narrative analysis allows me to observe and analyse significant aspects of companies (collective) and stakeholders (individuals) realities: commitment, lived experience, perspectives, and power relations. The analysis process enables me to interpret how individuals construct meaning from within their belief systems, their attitudes, values, and ideas that shape a sense of self.

In addition to its connection to richness, rigour also conveniently provides validity to the study (Tracy, 2010). Rigour is concerned with whether the study appears to be reasonable and appropriate. This is accomplished by providing evidence of the researcher's due diligence, exercising appropriate time, effort, care, and thoroughness. This is demonstrated in this research project by the time allocated to gather, disseminate, and analyse data and review the data selection process. As I collect MSSs, I assess their availability, frequency of updating and board approval therefore data gathering, and analysis becomes an organic process. During the fieldwork, I reflect on the strategies I use and adapt the recruitment process to increase the participation rate. As a result, meaning-making occurred throughout the research process rather than being a separate activity carried out after data collection (Gehart et al, 2007).

Finally, I adopt Riessman's view to dismiss criteria for validity based on realist assumptions and to acknowledge that a different framework might have produced a different analysis. The use of a narrative approach with its focus on the social construction of reality, means that uncovering the 'truth' no longer becomes the object of analysis (Rosenwald and Ochberg, 1992). Riessman (1993) argues that the starting point for evaluating the credibility of narrative analysis must be an explicit acknowledgement by the researcher that their analysis is the production of discourses or conceptual frameworks. Therefore, as Riessman points out, the basis for assessing the validity of an analysis no longer resides with the impossible task of representing the 'truth' but instead focuses on the notion of 'trustworthiness' (Riessman, 1993; Elliott, 2005). The emphasis is on the interaction between the researcher and participants. While being involved in interviews, listening to recordings, reading the conversations, and documents I assess what is being said and compare it with my personal understanding, without filling in any gaps, but rather inquiring about how the pieces make sense together. As such, the analysis does not claim to be any more 'truthful' than another, but rather renders the transparent process by which the interpretation of data has been reached (Riessman, 1993; Plummer, 1995).

4.6 Conclusion

This methodology enables me to gain an in-depth understanding of the actions taken by stakeholders in addressing MS in the UK events sector, through the review of primary data sources. The following four chapters present the findings that emerge as a result of the Labovian model of narrative analysis. The event-centred model of narrative analysis of MSS led to the reconstruction of two narratives focusing on *risks* and *people*, presented in *Chapter 5*. The experience-centred model of narrative analysis of participant interviews led to reconstructing three narratives centred on *compliance*, *collaboration*, and *action* presented in *Chapters 6, 7, and 8* respectively.

5 Risk and People Focused Narratives

5.1 Introduction

This chapter introduces a *risk focused narrative* and a *people focused narrative* that emerge in the analysis of Modern Slavery Statements (MSS). The MSS are produced by event companies and suppliers listed in *Table 5.1* and are referred to as *event companies*, *event organisations* or simply *organisations* throughout this chapter. To interpret the MSSs, I use the event centred model for narrative analysis (Labov, 1972). It occurs that the MSS appear to achieve different purposes: some statements are centred on the threat and the risks arising from Modern Slavery (MS), while others focus on the people within the organisations, although the two are not mutually exclusive.

This chapter is structured as follows: *moving from form to content* presents the analysis process and the findings resulting from the six elements of the Labovian model of narrative analysis; it maps the key stakeholders and organisational function areas engaged in MS prevention in line with the research objectives; *narratives emerging from MSS* presents the two narratives focused on risks and people with a particular focus on how organisations perceive and respond to MS, the implications this carries for their operations, and evidence of partnership; the *Refined Conceptual Framework*, is illustrated and finally, the *conclusion* summarises the key findings.

5.2 MSSs from Form to Content

According to Labov (1972) event centred narratives are stripped of emotion and structured based on six elements that usually appear in the following order: *abstract*, *orientation*, *complicating action*, *resolution*, *evaluation* and *coda*. As the MSS are similarly structured, I use the Labovian model to explore the content of MSS and answer the following questions:

- *Abstract*: How is MS perceived and defined? And what actions are taken against it?
- *Orientation*: What is the context of reporting? How is the company structured?
- *Complicating action*: How do organisations perceive the risks of MS?
- *Evaluation*: How are risks managed and mitigated?
- *Resolution*: How is performance measured?
- *Coda*: Who is responsible?

These questions enable me to explore the performance of MSS: how organisations respond to the threat of MS and the implications this carries for their operations. The performance of MSS refers to the interaction between the organisations producing the statements and the audience (Riessman, 1993). The organisations shape the statements with an intended or actual audience in mind. Events companies and suppliers are aware that they would be assessed by the public, investors, the media, and other external parties who represent the audience of the statement. Therefore, the statements are constructed from an organisational perspective, for a particular audience, and are thus imbued with motive (Brown, 2006).

The Labovian model is observed in the MSS as follows: the *abstract* and *orientation* allows to explore how organisations define MS and provide insight into the organisational context in which narratives are produced, recounted, and consumed; *complicating action*, *evaluation* and

resolution are analysed together to conceptualise the organisations' interpretation and response to MS risks. The three elements allow to explore the threat of MS, the organisations' interpretation of risk of MS, and mitigating the identified risks; finally, *coda* allows to explore how organisations attribute internal responsibility for MS and it leads to mapping key stakeholders' responsibility along with the function areas engaged in addressing MS. The event companies and suppliers producing the statements are listed in *Table 5.1*.

5.2.1 Defining Modern Slavery and Setting the Context

According to Labov (1972) and Riessman (1993) abstract refers to the introductory part of a narrative while orientation is used to explain who, what, when and where. Within the analysed statements the introductory section states the purpose of reporting, which is mainly linked to the requirement to publish under the MSA due to companies' annual turnover as seen in the example below:

'As SMG Europe Group's annual turnover is in excess of the £36m threshold set out in the Modern Slavery Act 2015 it is required to publish a statement setting out the measures it takes to prevent modern slavery.' (SMG Europe, 2018)

In contrast, some organisations (Glastonbury, Elior, Accor, Hilton) associate the purpose of reporting to their mission or identity:

'We are proud of our mission to strengthen the communities in which we operate. We will continue to build upon our existing efforts to prevent human rights abuses and to combat modern slavery and human trafficking across our global operations, and to work with our industry partners to share best practices.' (Hilton, 2017)

The purpose of reporting is followed by a conceptualisation of MS and setting the context of the organisation. Most of the reviewed statements briefly outline the organisation structure, supply chain, and/or subdivisions covered by the statement; few of the statements include information about the number of employees, locations, and number of sites the company operates in, or the industries to which the organisation provides its services.

MS is vaguely defined in most reviewed statements. In four of the statements (Elior, CH&CO, AELTC, and Capita), MS is defined as a 'crime' which infers conceptualising MS under a legal framework. The other MSSs included a broader interpretation of the term. Some of the statements elaborate that MS can take many forms, such as: forced labour, servitude, compulsory labour including human trafficking. Several statements distinguish slavery and trafficking practices, while others place trafficking under the MS umbrella term. Events venues, in particular, differentiate MS from human trafficking. This distinction could be due to the fact that events venues (particularly hotel chains) face additional risks of sexual exploitation on their premises (Carr, 2016; Matheson and Finkel, 2013), a risk which is acknowledged in several of the reviewed statements. However, there is no evidence in the defining sections nor in the rest of the statement to validate this assumption. Four of the statements specifically focus on 'forms of forced and compulsory labour' (Elior, CH&CO, AELTC, and Capita).

There are many similarities in the vocabulary used across MSSs, which are rich in action verbs (prevent, combat, address, tackle, eliminate, or eradicate) and adverbs, while few adjectives are used, especially in describing and interpreting MS. Only one of the statements uses the

adjective 'heinous' in reference to MS in their more recent statements (Capita, 2018, Capita 2019). Although this is not an uncommon finding considering these are corporate documents, the language differs significantly compared to government generated documents and policies relating to MS (including the MSA and TiSC Guidance) where MS is often defined as a heinous crime (HM Government, 2017).

Most of the statements use the verb 'preventing' when discussing the actions they take or aim to take against MS and human trafficking (Accor; Admirable Crichton; Hilton; SMG Europe; The O2 Arena; Elinor, AELTC, CH&CO). Most organisations state that they are 'committed' to preventing '*human rights abuse*' and '*acts of slavery and trafficking*'. They use the adverb 'committed' predominantly in the introduction of the statement often in conjunction with: 'addressing' human rights issues or the risks arising from MS, 'ensuring' the crime does not take place in the organisation or supply chains, 'tackling' or 'eliminating' all forms of forced and compulsory labour 'removing' the risk, 'opposing' all forms of slavery and human trafficking and also 'protecting' against MS and Human Trafficking.

In contrast, 'combating' is used more by events venues and on some occasions linked to specific types of exploitation:

'In order to better combat sexual exploitation, we launched the Global Freedom Exchange programme in partnership with Vital Voices, an international network of activists on the forefront of global efforts to prevent and respond to the crime of child trafficking' (Hilton, 2017)

The term, however, is less predominant in the introductory sections of the statements and more in the sections outlining the steps undertaken against MS:

'policies designed to combat slavery, servitude, forced labour and human trafficking' (AELTC, 2019).

The actions organisations are committed to take against MS include preventing, combatting, addressing, tackling, eliminating, and eradicating. Although they carry different practical meanings, the verbs are often used interchangeably within the statements, similarly to many academic and media publications (Kempadoo et al, 2016; Cockbain, 2018). Apart from 'acting ethically' which is associated in statements with specific policies (Employee Code of Conduct and Equal Opportunities Policies), there is no correlation between the wording used, the actions and policies or processes employed to achieve them; nor is there any evidence of measuring the effectiveness of tools employed to achieve this over the course of several years of reporting. This leads to questioning organisations' commitment and to a more thorough examination of their action in subsequent sections.

5.2.2 Perceived Risks of Modern Slavery

To explore the risks associated with MS, I evaluate the MSS against the TiSC Guidance (2017). The TiSC Guidance contains information for organisations to demonstrate compliance with the *minimum requirements* referring to: *when the statement should be published, how frequently it should be updated, who should approve it, and where it should be published*. Compliance to the minimum requirements is listed in *Table 5.1*.

Event Companies and Suppliers Classification		MSS Compliance - Minimum Requirements			
		Year	Available on UK website (homepage)	Approved by board of directors (or equivalent)	Signed by director (or equivalent)
Event Management Companies	Capita Travel & Events	2019 2018* 2017*	Y (only 2019 statement)	Y	Y
	CWT	2018	Y (ethics and compliance page)	Y	N
	Clarion Events	2019 2018*	Y only 2019 statement	N	Y
	Glastonbury Festival Events	2019	Y	N	Y
	ITE Group PLC – rebranded: Hyve Group	2019 2018	Y (compliance page) only 2019 statement	Y	Y
	Jack Morton Worldwide (Interpublic Group IPG)	2018 2017*	Y only 2018 statement	N	Y
	Layer123 (Euromoney)	2019 2018* 2017*	Y only 2019 statement	N	Y
Event Venues	Accor	2019	N	Y	N
	AELTC (Wimbledon)	2019 2018*	N	N	Y
	Bewl Events & Waterpark	2017	N	N	Y
	Hilton	2018* 2017* 2016*	N	N	Y
	IHG	2016	N	Y	Y
	The O2 (Anscot Arena)	2019 2017*	Y only 2019 statement	N	Y
	NEC Group	2019 2017* 2016*	Y only 2019 statement	Y	Y
	SMG Europe (ASM Global)	2018	Y	N	Y
	Venue Elixir	2018 2017 2016	Y	N	Y
	Whitbread	2019 2018	Y	Y	Y

Event Suppliers: Catering and Staffing	Admirable Crichton Group	2018	Y	Y	Y
	Compass Group	2019 2018* 2017*	Y	Y	Y
	CH&CO	2019 2018* 2017* 2016*	Y only 2019 statement	N	Y
	Rhubarb	2017*	N	N	Y

Table 5.1. MSS Compliance to minimum requirements

Although the TiSC Guidance does not dictate in detail what the MSSs must include or how they should be structured, it does provide a non-exhaustive list of information that may be included:

- *Organisation structure and supply chains*
- *Policies in relation to slavery and human trafficking*
- *Due diligence processes*
- *Risk assessment and management*
- *Key performance indicators to measure effectiveness of steps being taken*
- *Training on modern slavery and trafficking*

The TiSC Guidance stipulates that organisations are not expected to guarantee that all their supply chains are ‘slavery free’ (HM Government, 2019). However, statements should describe the main actions taken during the financial year to deal with MS risks in their supply chains and their own business. If the organisation takes no steps to deal with MS risks, they must still publish a statement stating this to be the case. Evaluating the MSS against the TiSC Guidance allows me to identify further questions to be explored in interviews and leads to refining the conceptual framework.

The statements show distinct interpretations of risks arising from MS. In the 42 reviewed statements, I find different responses to what the risks are believed to be and whether these risks are found within the business operations and/or supply chains. In most statements risks are not specifically defined nor associated with specific types of exploitation, category of subcontractors, industry, or geographical region. Neither are the indicators used to evaluate and assess said risks. According to the TiSC Guidance, this weakens a company’s ability to develop a targeted response (HM Government, 2017). Consequently, the response to MS and HT in most statements is untargeted, often supported by existing policies in the organisation (Corporate Social Responsibility, Employee Code of Conduct, Whistleblowing, Right to Work and Equal Opportunities Policies) or a ‘zero-tolerance’ policy or statement.

While organisations share similarities regarding the context in which they operate, their workforce, and suppliers, there is a significant difference in how risks are perceived. It is unclear from the statements alone why some organisations do not consider to operate in a high-risk sector while others take the risks of MS ‘very seriously’. The organisations that do recognise risks of MS tend to predominantly associate them with their supply chain. As part of their efforts to monitor and reduce those risks in their supply chains, the organisations briefly list due diligence procedures, defined as the degree of care that is reasonably expected or

that is legally required (Smit et al 2021). With very small variations, I find the same sequence of steps: *identify, assess, monitor, reduce, and protect whistle-blowers* across several MSSs (AELTC; Layer123; Bewl Events; SMG: IHG; The O2 Arena, Clarion Events).

To mitigate risks, organisations rely on supply chain auditing (conducted internally or via third-party auditors). While training is often mentioned, who receives the training is not always clarified in the statements. Some organisations report they require all staff to be fully aware of the legislation (Capita and Glastonbury) while others provide training to procurement teams to enable them to identify any high-risk suppliers.

'The Accor Group also engage in awareness and education of our leadership team members and conduct risk-based due diligence within its supply chains'. (Accor, 2019)

'We are also training our procurement teams in associated due diligence processes'. (Capita, 2019)

'We will continue to strengthen our approach to managing the risk of modern day slavery within our business and supply chains and: continue to roll out training and increase audits of our high sustainability risk suppliers'. (Capita, 2019)

Although the reviewed statements do not explicitly acknowledge labour as a possible type of exploitation in their own operation, they do reference employment and recruitment practices designed to 'reduce the risks of MS'. This raises questions concerning the chain of translation employed by organisations in interpreting and reporting MS risks (O'Kelly, 2019; Sarfaty, 2020).

Unlike other events companies, events venues also face exposure to sexual exploitation risks (Lusby et al. 2015; Kim and Kaewnuch, 2018; Paraskevas and Brookes, 2018a); although not the most prevalent form of exploitation in UK businesses (Crane, 2013; Dowling, 2007; LeBaron, 2014; GLAA, 2021), this is the most talked about risk, specifically identified and tackled through internal processes and partnership engagement. Accor, IHG, Whitbread, Hilton frame MS risks as 'child or adult exploitation sexual or otherwise'. A common response to addressing the risk of sexual exploitation, child sexual exploitation (CSE), and sex trafficking is providing training. Training is used by IHG, Accor, Hilton, and Whitbread, to increase awareness (of HT and the potential risk of hotels being used to harbour or exploit victims) and to empower staff to spot the signs and act on any suspicions quickly and effectively. To further reduce this risk several of the reviewed companies develop partnerships with international NGOs, local government, and police.

'Recognising the risk that our sites, particularly our hotels, could be used as a place for trafficked individuals to be harboured or exploited, we have taken steps to empower our team members to respond in the right way if they suspect that something is not quite right'. (Whitbread, 2018).

Reporting the key performance indicators (KPIs) used to measure effectiveness of the steps undertaken is largely omitted from most of the reviewed statements, although this is one of the six areas the TiSC Guidance recommended. According to the Home Office, carefully designed KPIs can help organisations demonstrate as clearly as possible if they are making progress over time in addressing MS in their business or supply chains (HM Government, 2019). Only two of the reviewed organisations (Admirable Crichton and Whitbread) self-

evaluate the company's effectiveness of mitigating and managing risks. Both organisations list the KPIs used in preventing MS but do not report on the effectiveness of the measures employed, nor do they apply any measures of quantitative assessment to evidence their progress over time. Furthermore, it is unclear whether the measures unveil any incidents and what possible improvements to the policies and processes the organisations believe are warranted. An additional recommended way to measure performance is to keep previous statements available online even when new statements are published (HM Government, 2019; ETI, 2018). However, at the time of this analysis, only Elinor and Whitbread have previous statements available on their website.

Comparing the responses of different events organisations, shows that the language used to 'pledge commitment' to address risks or operate ethically is disconnected from the actions companies say they are involved in. It is clear from the reviewed statements that risks are not perceived similarly across the industry, what is less clear however is the reasoning behind this- considering that the industry characteristics render all reviewed organisations exposed to risks of labour exploitation. Comparing the statements based on organisation type, reveals that overall event venues (primarily hotels) produce more detailed content, develop some targeted measures, and are more likely to be engaged in partnerships. However, many of the risks prevented relate to sexual exploitation and CSE. This reflects events management organisations' level of awareness, given that several event companies believe they do not operate in a high-risk sector. It also shows that progress on addressing MS in the hospitality sector may be more advanced compared to events.

5.2.3 Mapping Key Stakeholder Responsibility

The final sections of the MSS enable me to map internal stakeholders' roles and responsibilities in addressing MS and on a few isolated occasions their engagement in partnerships. While several statements use the term 'accountability' in this section, it is unclear if or how stakeholders are held accountable, or which legal requirements and codes of conduct are used in establishing accountability. The final section also reflects organisations' commitment to report their progress in the upcoming financial year which is again directly communicated to the audience (clients, competitors, members of the public). As recommended under TiSC Guidance (2021), year-on-year improvements are expected to demonstrate practical progress on how organisations are tackling the risks and incidence of MS in their operations and supply chains. Several statements include a few words on their *intention* to continue to maintain and regularly review the policies or standards reported in the statement, to 'further develop' policies and processes and to produce a new statement in the following financial year.

An ongoing commitment is reflected in the organisations' decision to report on a yearly basis, and to make previous statements available; although, in some cases analysing previous statements is a limitation due to their unavailability (which may be due to the company's annual turnover in previous years). To a large extent statements covering different years report the same information and most changes are stylistic rather than content related. Moreover, only eleven of the 21 included organisations have an up-to-date statement on their website, as of 2020 when this analysis is conducted (Capita, Clarion, Glastonbury, ITE, Layer 123, AELTC Accor, The O2, NEC Group, Whitbread, and CH&CO). This is generally how most of the reviewed statements conclude, with what Labov (1972) calls the *coda*.

The MSA requires the statements to be approved and signed by an appropriate senior person in the business to conclude and seal their commitment. According to the TiSC Guidance, this ensures senior level ‘accountability, leadership, and responsibility’ for MS and gives it the ‘serious attention it deserves’ (HM Government, 2017). Seven of the 21 companies (Capita, ITE, IHG, NEC Group, Whitbread, and Admirable Crichton) have both board approval as well as a signature from a senior person in the business (most often a Chief Executive Officer, Executive VP, or Director), as illustrated in *Table 5.1*. While most statements have either the board approval or the signature of the CEO, Chairman, Chief Financial Officer or President.

‘The Chairman and Chief Executive Officer of the Accor Group and the Accor Group’s directors are responsible for promoting the values and commitments to their teams and carefully tracking their application’. (Accor, 2019)

In addition to attributing senior level responsibility in the concluding section of the statement, I find several examples of responsibility attribution of different levels of management throughout the statements; this indicates that responsibility for MS is devolved across the company. One recurring area is in relation to purchasing and supply chain management. Several companies differentiate purchases at group and regional level and attribute different responsibility to those managing them: at group level, procurement has a duty to setting the right policies that enable ethical performance of the supply chain and developing a risk management process for suppliers while the regional procurement departments are responsible for policy compliance and risk management.

‘The Procurement Department has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. The Group Purchasing Director has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.’

‘A dedicated Compliance lawyer working full-time in the Accor Group Corporate Legal Department on the Compliance program’. (Accor, 2019)

Ensuring ‘fair working conditions’ for all employees translates in terms and conditions of employment, remuneration, working hours, health and safety, resting time, holiday entitlements and benefits. These are applied according to territory-specific statutory requirements, diversity and inclusion policies, and quality of life at work. Recruitment managers have a duty to perform right to work checks and DBS checks in accordance with Home Office Disclosure and Barring requirements, HR Directors are generally responsible for developing recruitment processes and policies.

As dictated by the internal MS Policies available, in several of the reviewed companies (especially events venues) the prevention, detection, and reporting of MS in any part of the business or supply chain is the responsibility of ‘direct employees and other people working for the company’ collectively referred to as ‘all staff’. All staff are required to avoid any activity that might lead to, or suggest, a breach of policy. In addition, they are responsible for reporting risks or incidents to line managers or the Procurement Department if they believe or suspect that a conflict with the policy has occurred or may occur in the future.

‘Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given any required training.’ (CH&CO, 2018)

Attributing responsibility of MS prevention in the statements enables me to map function areas and the stakeholders likely to be engaged in addressing MS at different levels of management as illustrated in *Table 5.2*.

Group Level	
Key Stakeholders	Dedicated Responsibility
Head of Procurement and General Counsel	Duty to set the right policies that enable ethical performance of the supply chain; manage supplier participation in the responsible sourcing, develop a risk management process for suppliers, and set up an audit plan for high-risk supplies. In some companies they also produce an annual report reflecting their progress.
Director of Sustainability and Head of Responsible Sourcing (Sustainability Team)	Shared ‘accountability’ for measuring, mitigating and remediating risk in the supply chain.
HR Directors	Responsible for developing recruitment processes and policies
Legal Departments	Ensure compliance with all applicable laws and regulations
Compliance Department (in some cases sub-division of Legal Department)	Conduct audits in all areas of the business (direct operations and supply chains);
Regional Level	
Key Stakeholders	Dedicated Responsibility
Regional Procurement Departments	Responsible for policy compliance and ensuring that the risks are being managed within their remit,
Line Managers and Recruitment Managers	Duty to ensure compliance to recruitment and employment processes and Equal opportunities policies, to identify and report potential incidents, and to provide the right level of training to their staff.
Staff members	Duty to report to line managers, procurement teams if they suspect any breach of policy.

Table 5.2 Mapping Stakeholder Responsibility

5.3 Narratives emerging from MSSs analysis

The event centred model of narrative analysis abstracts two distinct narratives (Labov, 1972): one centres on the threat and the *risks* arising from MS, the other focuses on the *people* within the organisations. To examine what the MSSs are seeking to accomplish (Riessman 2002; Elliot 2005) the core element of reporting is compliance to the Act. All 42 reviewed statements are written in accordance with section 54(1) of the MSA and set out the steps taken against MS for the financial year they are published (HM Government, 2019). Most statements convey ‘commitment’ to address MS. Expressing commitment is an opportunity for all organisations to make promises to their audience and to convey their dedication to different causes (Monciardini et al, 2019). This receives significant attention in the literature on Corporate Social Responsibility (CSR) (Kim et al, 2018; Humphreys and Brown, 2008). In the context of

CSR, studies suggest that stronger corporate commitment leads consumers to hold more credible perceptions of the company and favourable attitudes toward it (Kim et al, 2018). However, in assessing the significance of reporting in each statement assessing companies' commitment becomes more difficult.

I explore the 'commitment' pledged by organisations and look at how it is reflected in the actions reported in different sections of MSS produced between 2015 and 2020 when the analysis is conducted; it occurs that some statements are centred on the threat and the risks arising from MS, while others focus on the people within the organisations. This informs that organisations perceive the significance of reporting and transparency differently: while some organisations attribute the statement to the requirement to publish due to their annual turnover, others also take pride in reporting and aim to inspire others in the industry to do so.

The distinction between the people focused and risk focused statements provides insight into how organisations perceive MS and the significance of transparency and reporting as reflexive practice in risk management. This leads to reconstructing the two narratives focused on risk and people as illustrated in *Figure 5.1*.

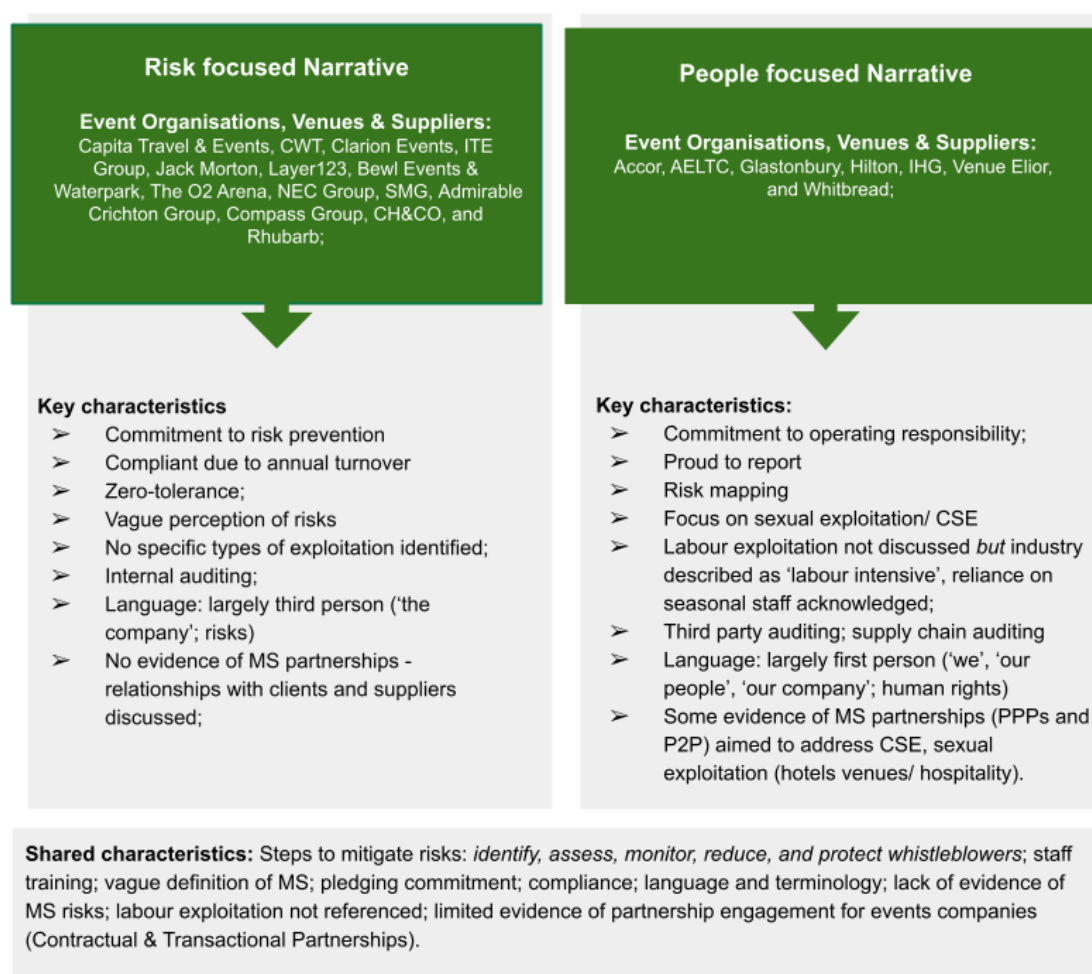


Figure 5.1. Risk and People Focused Narratives

The two narratives present the nuanced interpretation of MS (what it is and where it occurs), MS risks, and implications for the event sector. They outline the actions taken by event

organisations to address this. The perceptions of MS risk lead to certain solutions being developed and deployed, and informs organisation's approach to partnership development and engagement. The two narratives pertain to mainstream perspectives and solutions to addressing MS risk in the industry. The vast majority of reviewed statements are risk focused, with only seven people focused statements.

5.3.1 Risk focused narrative

The *risk focused narrative* is reconstructed from the analysis of MSSs produced by 15 organisations (listed in *Figure 5.1.*) with limited detail about the organisations' structure (the number of employees, types of contracts, locations and number of sites the company operated in), limited information about their supply chains (expenditure and breakdown of their supply chain), and no information about the industries they work with. The *risk focused narrative* is centred on preventing and reducing the risks of MS:

'Committed to preventing acts of forced labour, modern slavery and human trafficking from occurring within its business and supply chain' (Admirable Crichton, 2018)

MS and purpose of reporting

The risk focused narrative associates the purpose of reporting with compliance to the MSA due to the organisations' annual turnover:

'As SMG Europe Group's annual turnover is in excess of the £36m threshold set out in the Modern Slavery Act 2015 it is required to publish a statement setting out the measures it takes to prevent modern slavery.' (SMG Europe, 2018)

'All businesses with over £36m in annual turnover conducting business in the UK are required to publish a slavery and human trafficking statement.' (ITE Group)

Organisations express firm commitment to 'combating MS' and 'preventing acts of MS and HT'. However, there is limited evidence demonstrating how commitment is upheld and which actions lead to prevention. The language is impersonal, most statements are written in third person with the name of the organisations often mentioned throughout the MSS. Terminology is consistent with CSR discourse as MS is framed under familiar business terms (O'Kelly, 2019; Merry and Levitt, 2019)

MS risks

The risk focused narrative conveys a vague definition of MS and HT with no detail relating to the types of exploitation or risks that can occur which are generically referred to as 'risks of MS'. Perception of MS risk ranges from 'no risks' to 'some supply chain risks'. This means that direct MS risks are not acknowledged in the risk focused narrative. MS risk is interpreted as an external issue:

'We do not consider that we operate in high-risk sectors or locations at present.' (SMG Europe, 2018)

'Currently, however, we do not consider that we operate in a high-risk sector.' (The O2 Arena, 2019)

'Given the nature of our business, [Jack Morton] does not consider that there is a significant risk of Slavery and Human Trafficking within its supply chain or its own business.' (Jack Morton, 2017)

'Our direct risk is generally low.' (ITE Group, 2018)

Considering that the event sector relies on practices that are found to increase the risk of MS and specifically labour exploitation (Crane et al, 2019; Christ and Burritt, 2018), it is concerning that many organisations do not consider they are operating in a high-risk sector and questions arise over how organisations reach this conclusion. It is unclear how companies become informed about direct MS risks as there is no evidence of risk assessments or disclosure of mechanisms used to assess the nature and exposure to MS to support this conclusion. However, from a compliance perspective, companies are under no legal requirement under Section 54 of the MSA to investigate whether their labour practices are high-risk, hence the criticism brought to legislation for leading to vague reporting (Phillips, LeBaron, and Wallin, 2018). As such, compliance to minimum requirements is easily achieved in many instances, irrespective of the quality of reporting. The content and level of detail of risk focused statements reflects the attitudes organisations have to reporting. This informs organisations' commitment (or lack thereof) to engage 'beyond legal compliance' and address MS.

Transparency in supply chains

In contrast, organisations that identify some risks generally associate them with supply chains, as such MS is perceived as an external issue within this narrative. None of the 15 organisations mentions labour exploitation nor their reliance on agency staff, even though their organisations are linked to franchising models, and subcontracting labour. Therefore, in the context of this narrative *what* constitutes a risk is not defined, and risks are seldom associated with specific types of exploitation, category of subcontractors, industry, or geographical region, with the exception of Capita and Layer 123:

'Event construction in non-EU / non-US countries (Middle East, Asia, Africa, Latin America), contracted maintenance staff working in the company's offices in all locations (e.g., cleaning, catering, security, building services), offshored or outsourced operations located in developing countries including software developers, data and list researchers and sales and customer service' (Layer123, 2018).

According to the TiSC Guidance failing to map specific risks weakens an organisations' ability to develop a targeted response. Consistent with this assessment, the response to MS and HT in most statements linked to this narrative is untargeted, often supported by existing policies within the organisation (Corporate Social Responsibility, Employee Code of Conduct, Whistleblowing, Right to Work and Equal Opportunities Policies) or a 'zero-tolerance' statement. CSR policies are used by several organisations including Admirable Crichton, and Jack Morton and to manage the organisations' environmental impacts and their work with suppliers and local communities. According to Admirable Crichton their CSR policies outlined their goal to promote sustainable growth with responsible, innovative, and ethical business practice, which supports their Modern Slavery and Human Trafficking Policy. This policy, however, is not publicly available for further inspection.

Some of the organisations provide information about identifying and mitigating risks, in some cases, through what they believe to be 'appropriate policies and procedures' to ensure that

MS is not taking place in their operations or supply chains. The O2 Arena and ITE Group state that they ‘regularly evaluated’ the nature and extent of exposure to the risk of MS occurring in their supply chains, by ‘maintaining an open dialogue’ or ‘maintaining long-term relationships’ with all suppliers. This points to Contractual Partnership as a means to address MS risks in supply chains developed based on explicit, legal contracts, that typically govern the responsibilities and obligations of the stakeholders engaged (Shin, Park, and Park, 2019; Yam and Chan, 2015). However, the contractual terms, nature of engagement, and partnership objectives are not detailed in statements.

Jack Morton seeks to ‘maintain its high standards and identify improvements’ through a review of supplier engagement policies and due diligence processes to continually monitor the risks of MS, although it is unclear how this is achieved. An inconsistency is observed here: although they do not believe to be operating in a high-risk sector, some organisations (Jack Morton, the O2 Arena, and ITE) refer to developing and implementing policies and processes as part of their efforts to monitor and reduce the risk of MS occurring within their business and supply chains. For example, The O2 Arena (2019) has policies and processes designed to:

‘establish and assess areas of potential risk, monitor potential risk areas in our business and supply chains, reduce the risk of slavery and human trafficking occurring in our business and supply chains, and provide adequate protection for whistle-blowers’ (The O2 Arena).

Overall, the statements lack the appropriate supply chain mapping that would enable their organisations to identify and eradicate MS from supply chains according to best practises (HM Government, 2021; Crane et al, 2019). Despite increasing evidence that subcontracting and outsourcing staff fuels exploitative labour practices (LeBaron and Rühmkorf, 2017; LeBaron, 2018), suppliers are generically summed up as ‘many and varied’ (The O2 Arena, ITE, NEC Group, CWT, Rhubarb). Few organisations provided more detailed information. For example, CH&CO classify their supply chain based on key product categories of food equipment and disposables and aims to amalgamate all suppliers into a single set of group-wide suppliers to minimise the risk of non-compliance with the Act. Capita states that 68% of their suppliers are small and medium-sized enterprises (SMEs) in an attempt to support local businesses to grow and succeed. Capita presents the high percentage of SMEs as a means to support local businesses. However, questions arise over the organisations’ awareness of increased risks of MS associated with SMEs (Crane et al, 2019) and different categories of suppliers regional or industry related. This informs organisations perspectives on subcontracting to contribute to the economy.

To mitigate the risks associated with their supply chains, statements use the same sequence of steps: identify, assess, monitor, reduce, and protect whistle-blowers. Within the *risk focused narrative* a ‘zero-tolerance’ approach is applied to suppliers. While measuring the effectiveness of any risk management is largely omitted from this narrative. Gimenez and Tachizawa (2012) identify that organisations divide their efforts between two main approaches: setting standards versus direct engagement. This is reflected in the engagement between organisations and their supply chains, presented in this narrative. Assessing suppliers and setting standards is observed in the risk focused narrative.

The risk narrative is characterised by a zero-tolerance approach in working with their suppliers, although terminating relationships with suppliers over the discovery of MS risks or incidents

receives extensive criticism. NGOs and MS bodies advocate for continuous engagement with such suppliers. They recommend implementing action plans and monitoring results in order to remediate problems in their supply chains (ETI, 2018; IASC, 2018; PWC, 2019). Several of the reviewed organisations (CH&CO, Bewel Events, CWT, Capita) express a ‘zero-tolerance’ or ‘no tolerance’ to MS and human trafficking and require contractors, suppliers, and other business partners to comply with applicable laws, codes of conduct, and their values. This is said to be enforced through ‘structured contractual documentation’ requiring suppliers to commit to complying with all ‘relevant laws and regulations’. CH&CO extended their zero-tolerance approach to their employees, who if found in breach of policies relating to MS and HT face disciplinary action, resulting in dismissal for misconduct or gross misconduct.

A supply chain compliance or checking programme is carried out by some of the organisations (CH&CO, Capita) to ensure companies in their supply chain uphold their commitments. Organisations seek to establish and maintain long-term relationships with ‘trusted’ suppliers with a view to ensuring that all parts of the supply chain act in accordance with applicable laws, however no detail is provided in any of the statements as to which laws this refers to. Consistent with Ethical Trading Initiative (ETI) recommendations (2018) for continuous engagement discussed earlier, the HM Government (2015) state in the TiSC Guidance that organisations must consider the approach that would produce the safest outcome for the potential victims and exercise their economic influence and control over those who may be committing crimes. Recommendations include engaging with local NGOs, industry bodies, trade unions, or other support organisations to attempt to remedy the situation or contact local Government and law enforcement bodies. This would include working with at-risk suppliers to provide training and guidance to implement anti-slavery policies. If, after receiving support, the supplier is not taking the issue seriously, the organisation ultimately could reconsider their commercial relationship with that supplier (HM Government, 2015; ETI, 2018). Except for CH&CO, Capita, and CWT, who reserved their rights to terminate relationships with suppliers found to be in breach of ‘laws and regulations’, the other statements do not explain what measures are taken if suppliers fail to comply. Therefore, it is inconclusive what the consequences of the zero-tolerance approach are.

‘We are also training our procurement teams in associated due diligence processes’.
(Capita, 2019)

‘We will continue to strengthen our approach to managing the risk of modern day slavery within our business and supply chains and: continue to roll out training and increase audits of our high sustainability risk suppliers’. (Capita, 2019)

The risk narrative is underpinned by reliance on internal auditing. Most organisations use internal auditing supported by their Compliance Department which is said to ‘regularly’ conduct audits in all areas of the business (direct operations and supply chains) or by the internal Legal Departments to ensure compliance with all applicable laws and regulations. At the time of the analysis, the events companies using internal audits do not report the outcomes, the frequency of auditing or which laws are considered applicable, consequently it is difficult to ascertain how effective internal audits are. Researchers and practitioners in the field state that internal auditing alone is unlikely to identify instances of exploitation without the support of other anti-slavery policies and practises (Sereni and Baker, 2018; HM Government, 2017). The TiSC Guidance also advises investigating working conditions with support from expert independent, third parties and civil society stakeholders to hear from workers themselves about the working

conditions (HM Government, 2021). Statements referring to audits carried out by a third party are less frequent. In contrast, the statement produced by Capita includes significantly more facts and figures compared to the rest of the statements that lead to the risk focused narrative; it provides evidence of the outcomes of audits and makes year-on-year progress to address risks and improve outcomes for workers in the business and supply chains, a practice recommended by the Home Office Guidance (HM Government, 2017):

'In 2018, 234 suppliers were identified as having high sustainability risk. 19 in high risk countries of modern slavery (1% of spend). 215 with more than £1m annual spend (40% of spend). All were invited to carry out a third-party audit. 53% have been fully assessed and rated as having appropriate policies and procedures in place to ensure that modern slavery is not taking place in their operations or supply chains. For the remaining 47%, we will ensure an increase in assessment response rate and participation this year' (Capita MS statement, 2019).

Evidence of partnership

With respect to partnership engagement and collaborations, three organisations (Capita, Admirable Crichton, and Clarion Events) reference contractual partnerships with suppliers, contractors and/or third-party auditors. The main purpose of such collaboration is ensuring compliance within the supply chain. Although not a lot of information is available in their statements to understand how these partnerships work, the relationship is bound by contractual documents to reflect the zero-tolerance approach and determine suppliers and other business partners to comply with applicable laws, regulations, and codes of conduct. Capita mentions maintaining good collaborations with suppliers and partners who conduct audits: *'we partnered with an independent body to analyse our supply chain'* (Capita, 2019). As such, there is limited evidence of partnership seeking to prevent or address the implications of MS in the risk focused narrative.

5.3.2 People focused narrative

The *people focused narrative* emerges from the analysis of statements produced by seven of the 21 organisations: Glastonbury, Elior, Accor, IHG, Hilton, AELTC (as illustrated in *Figure 5.1.*). In contrast to the risk focused narrative, differences are observed in the language, level of detail, internal and supply chain risk mapping, explicitly identified types of exploitation, targeted responses, and policy implications. Most importantly, the statements underpinning this narrative also discuss the organisations' engagement in MS partnership; this leads to reconstructing a narrative focused on people. The *people focused narrative* outlines a distinct perspective that demonstrates some concern for people, fair recruitment, and employment policies. It outlines specifically how the sector is exposed to MS risks linked to direct operation and outsourcing channels.

MS and purpose of reporting

The people focused narrative associates the purpose of reporting to organisations' commitment to operating responsibly therefore organisations are 'proud to report'. Unlike the risk narrative which expresses commitment for preventing undefined MS risks, this narrative pledges commitment to 'operating responsibly', 'acting ethically,' or 'purchasing in an ethical and transparent manner', and 'to assessing the impact' organisations have on their

employees, supply chain workers, and local communities. This is supported by policies that extended beyond MS and HT and include supporting the protection of human rights (IHG; Elinor; Accor; AELTC – Wimbledon; Hilton):

‘a commitment to operating responsibly underpins our entire strategy and this includes supporting the protection of human rights’. (IHG, 2016)

‘Strongly committed to the goal of being a responsible company that shares value, works to obey ethical principles, complies with applicable laws and regulations, and honours the commitments to its various stakeholders. This commitment extends to human rights including modern slavery and trafficking.’ (Accor, 2019)

Furthermore, organisations take pride in reporting and aim to determine or inspire others in the industry to do so; throughout the statements they talk about their employees, consumers and the public whose lives are impacted by their business activity (Hilton, IHG, Glastonbury, AELTC, Elinor).

‘We are proud of our mission to strengthen the communities in which we operate. We will continue to build upon our existing efforts to prevent human rights abuses and to combat modern slavery and human trafficking across our global operations, and to work with our industry partners to share best practices’. (Hilton, 2017)

‘As an industry leader, the Accor Group believes in inspiring and encouraging as many as possible to follow its lead – employees, customers, partners and local communities’. (Accor, 2019)

‘We are proud of the steps we have taken to combat slavery and human trafficking’ (Bewl Events, 2017)

The language and terminology of the people focused narrative is somewhat more specific to MS discourse; although corporate language is not eliminated altogether and some labour and human rights terminology used to frame exploitative practices as fair recruitment and employment, as observed in the quotes above. MSSs are written in first person with collective terms ‘we’, ‘our people’, and ‘our company’ used throughout the seven statements. Glastonbury, Hilton, and Elinor state in the introduction that they value ‘our people’, ‘people who work together each year’.

MS risks

The people focused narrative offers a vague definition of MS and HT, however MS is seen as a risk to people facing exploitation internally (concerning the direct operations of different organisations) and externally (linked to subcontracting and supply chains). This means that internal MS risks are acknowledged in the statements and that organisations demonstrate more evidence of recognising their role in addressing MS and support this:

‘risks of modern slavery affecting colleagues in our own organisation including our hotels, risks of modern slavery occurring in our corporate or hotel supply chains, risks of modern slavery such as human trafficking occurring in or around our IHG branded hotels, risks of modern slavery occurring at different stages of the hotel lifecycle and within supply chains of our hotel owners.’ (IHG, 2016)

The people focused narrative associates internal MS risks with sexual exploitation and sex trafficking. This is in part explained by the type of companies statements are sources from. Four of the seven organisations are hotels (although classified as events venues in the context of this research) and therefore exposed to risks of sexual exploitation (Paraskevas and Brookes, 2018a; Paraskevas and Brookes, 2018b; Robinson, 2013); however, empirical evidence suggests that labour exploitation is more prevalent in events and hospitality (GLAA, 2021; GLAA, 2020; Mair and Whitford, 2013; Kim and Kaewnuch, 2018; Dowling et al, 2013). The term 'combatting' is associated with specific policies linked to sexual exploitation. Although there is a correlation between the term and the use of targeted policies, the small number of statements and limited level of detail makes it difficult to infer the reasoning for the correlation. Still, 'combating' is used more by events venues:

'In order to better combat sexual exploitation, we launched the Global Freedom Exchange programme in partnership with Vital Voices, an international network of activists on the forefront of global efforts to prevent and respond to the crime of child trafficking' (Hilton, 2017),

'policies designed to combat slavery, servitude, forced labour and human trafficking' (AELTC, 2019).

The people focused narrative frames labour exploitation as employment conditions and recruitment standards. This is evidenced in two of the statements (Glastonbury and Elior) that describe in detail the steps they take to ensure their employment practices are not affected by MS; however, neither of the two specifically label this issue as labour exploitation and instead refer to 'preventing illegal working' (Elior, 2018) and 'combating slavery and human trafficking' (Glastonbury, 2019). Still, organisations recognise in their statements that the industry does not sustain full-time employment and is heavily reliant on seasonal and part-time workers:

'the industry is particularly labour-intensive and largely local.' (Accor, 2019)

'In our industry part-time, agency and casual workers are more typical than the traditional full-time employee. Casual workers agreements enable us to maintain a pool of individuals who may or may not be available at short notice to help at busy times of the year or when there is a major event function (such as a banquet, conference, race meeting, etc.) for which we require the services of extra colleagues.' (Elior, 2018)

Transparency in supply chains

The people focused narrative is underpinned by supply chain mapping. However, most statements refer primarily to tier-1 suppliers. Still more detailed information, compared to the other MSSs, includes: the numbers, expenditure, and breakdown of their supply chain (AELTC, Hilton, IHG); classification of suppliers based on key product categories of food, equipment, and disposables (AELTC and IHG). Hilton and IHG supported their reports with facts and figures, a practice which I found more often in the event venues (hospitality sector) compared to other events companies. Providing evidence of the outcomes of audits and making year-on-year progress to address those risks and improve outcomes for workers in the business and supply chains were good-practices recommended by the TiSC Guidance (HM Government, 2019).

Moreover, the people focused narrative reports in more detail on the due diligence processes and essential management tools that improved risk identification with details of the steps undertaken which followed the same five step sequence observed in the *risk focused narrative*: identify, assess, monitor, reduce, and protect whistle-blowers coupled with staff training. The statements cover the company policies and processes that managers need to follow when hiring new starters and legal documents required. In addition to recruitment processes Elinor, Hilton, and Accor design tools for their employees to spot common signs of exploitation and act if they believe someone is vulnerable to exploitation. Some of their statements include policies designed for human rights and employee wellbeing.

Outsourcing workers through agencies is briefly mentioned by Accor, Glastonbury, Elinor, and Hilton, however, the implications of outsourcing workers in assessing and mitigating risks of labour exploitation is not detailed in any of their MSS. Where agency or outsourced workers are mentioned, the organisations seek to make it clear that they have limited influence over the employment practices applied by the agencies they work with. Nevertheless, the seven organisations still demonstrated more evidence of direct engagement with suppliers, who are often referred to as partners, implying engagement in Contractual Partnerships.

The seven organisations conduct risk assessments to identify supply chain risks, in some cases by commissioning external partners to assess human rights risks most relevant for events, travel, and hospitality globally and regionally. The risks identified included human trafficking, forced labour, child labour, and working conditions. The notion of Transactional Partnership pertaining to the investment of business actors in the expertise provided by external actors to address the issues the organisation faces (Thompson and Brent, 2017; Sockett, 1997; Woolthuis, et al. 2005; Thompson and Jesiek, 2017) is observed here. Furthermore, direct engagement with suppliers increases the significance of reporting and transparency as reflexive practice in risk management. A more specific due diligence approach is used by two organisations (AELTC and Hilton) who state that they recognise the variety of supply chains and considered each business operations to determine ‘inherent or perceived’ supply chain risks:

In assessing each area, we take account of the nature of the work involved and the location in which the work takes place. For example, we consider certain onsite activities, such as host broadcast production and specialist IT services, to be relatively low risk. In contrast, we consider international supply chains for retail and merchandising to be of higher risk. (AELTC – Wimbledon, 2019)

Evidence of partnership

Evidence of partnership is significantly more extensive compared to the risk focused narrative. The people focused narrative includes examples of partnership engagement and recognises the importance of partnerships and collaborations in the knowledge that no single business could tackle the risks of MS alone (Glastonbury, Hilton, IHG, Accor, and Whitbread). It is important to note, however, that four of those organisations are event venues (hotels), therefore evidence of partnership engagement in the event sector remains scant. The membership, geographical reach, and outcome of partnerships discussed in the people focused narrative is varied. Most partnerships focus on preventing sex trafficking, sexual exploitation, and CSE many of which are labelled as ‘anti-trafficking’ partnerships. Such initiatives expand from a local to a global level and include NGOs, law enforcement, and

industry partners in their membership. The outcomes of those are generally training and staff awareness, with a few examples of partnerships seeking to protect vulnerable populations, and two focused on reporting and sharing intelligence.

Training and staff awareness is the outcome of transactional partnerships with NGOs presented in this narrative. Organisations seeking to increase staff awareness and empower staff to identify incidents of exploitation invest in training sourced from NGOs and MS consultants. These partnerships are more common for events venues (hotels) which faced additional risks of sexual exploitation (Paraskevas and Brookes, 2018b; Robinson, 2013). Both Hilton and Accor engage in partnership with an international NGO (ECPAT) that leads the fight against child trafficking and sexual exploitation. Whitbread, Accor and Hilton develop a Transactional Partnerships with an MS consultancy (Stop The Traffik) focused on developing a training programme to increase staff awareness of MS and empower them to respond and identify cases of sexual exploitation occurring on their premises.

P2P of collaboration is referenced by Hilton and Accor who collaborate to develop a program which helps organisations and hotels develop procedures to detect cases of sexual exploitation of children in travel and tourism. The programme involves local training initiatives designed to heighten employee awareness and 'vigilance' to identify incidents of exploitation more effectively, decide when to contact the authorities, and offer the child alternative life paths through reintegration projects. This provides evidence of P2P engagement to address MS, although as previously mentioned this too falls under hospitality.

Protection of vulnerable people is the scope of partnerships with NGOs and other MS and HT organisations referenced by Hilton and Accor. Hilton is engaged in a partnership (Global Freedom Exchange) with an NGO (Vital Voices) aimed at combatting sexual exploitation, that supports women from 39 countries to participate in learning and networking. Accor references a partnership with local organisations and NGOs (Solidarity Accor Hotels) developed to fight against the economic and social exclusions of disadvantaged people through vocational activities. It centres around supporting access to professional development, employment, and entrepreneurship by supporting projects that had a positive impact on vulnerable or marginalised communities. The partnership also provides long-term support for emergency and 'humanitarian catastrophes'. Hilton engages in partnership with an NGO (Global Fund for Children): the Hilton Anti-Trafficking Fund seeks to prevent exploitation by supporting anti-trafficking efforts around the world. The 'fund' supports five innovative, high-potential organisations in affected communities with annual grants and services. According to their statement, over the course of a three-year project, an estimated 1,500 children in Nigeria, South Africa, Thailand, Turkey, and the United Kingdom were positively impacted. It is unclear from the statements, what roles Accor or Hilton's plays in those partnerships, which internal departments or stakeholders are engaged, or what their contribution is (financial or otherwise). The wording used in statements leads to believe that the organisations provide 'support' and 'fund' initiatives. This leads to questioning whether some of the initiatives aiming to protect vulnerable populations are a form of partnership or sponsorship.

Findings show that partnerships seeking to prevent labour exploitation, framed as working conditions, employment and recruitment practices, are associated with suppliers and not organisations' direct operation. Glastonbury talks about collaborating with the Home Office to ensure their suppliers are 'legitimate' and that they are performing appropriate due diligence checks. Unlike the Contractual Partnerships with suppliers and auditors referenced in *risk*

focused narrative, this type of engagement is used in the stage before embarking on a relationship with a new supplier and informs on Transactional approaches to partnership with external actors.

Hilton and IHG recognise the risks associated with the conditions of recruitment, work, and accommodation only in the construction work associated with the development of their sites. To mitigate this risk, they work towards increasing hotel owners' awareness of key internal functions including procurement, human resources, development, design, and construction. They provide training and educate key suppliers with respect to high-risk 'sourcing arrangements' in the industry. However, it is unclear from the statements whether the sourcing arrangement refers to procuring materials or labour. Therefore, the risk of labour exploitation, while implied to some extent in the statements, is not the scope of any of the partnership examples provided in the statements focused on risk or people.

Finally, sharing intelligence is the aim of public private partnerships mentioned by Hilton and Whitbread, where industry actors engage with law enforcement and local authorities. Whitbread speaks about 'cooperation' with police and other authorities to tackle the issue and address concerns in responding to incidents. Hilton develops a preventative measure by launching Operation MakeSafe Campaign. This effort focuses on training hotel teams across London, including UK heads of housekeeping and UK labour agency partners to raise awareness about child trafficking. The above initiatives focus on addressing sexual exploitation, CSE, and child trafficking. While those risks are associated with hotels (Paraskevas and Brookes, 2018b; Stevenson and Cole, 2018), scholars and practitioners stress that sexual exploitation is second to labour exploitation for hotels as well as other businesses in the industry (GLAA, 2020; Mair and Whitford, 2013; Kim and Kaewnuch, 2018; Dowling et al, 2013). The table below illustrates evidence of partnership engagement presented in both the risk and people focused narratives.

MSS - Evidence of Partnership			
	Partnership Approach	Membership	Scope of collaboration & examples
Risk focused Narrative	Contractual Partnerships	events organisations, suppliers, and third-party auditors	supply chain compliance
People focused Narrative	Contractual Partnerships	events organisations, hospitality organisations, suppliers, contractors, and third-party auditors	transparency in supply chains;

	Transactional Partnership	hospitality organisations, NGOs, MS consultants	Stop The Traffik: develop training to increase staff awareness of MS and identify cases of sexual exploitation occurring on hotel premises; ECPAT: address child trafficking and sexual exploitation in travel and tourism; Global Freedom Exchange: protect vulnerable populations from sexual exploitation (sponsorship); Solidarity Accor Hotels: protect vulnerable populations against the economic and social exclusions (sponsorship); Global Fund for Children: the Hilton Anti-Trafficking Fund seeks to prevent exploitation by supporting anti-trafficking efforts around the world (sponsorship).
	Peer-to-peer Partnerships	hospitality organisations	Develop mechanisms to identify cases of sexual exploitation of children in travel and tourism; training to raise staff awareness and uncover instances of CSE/ sexual exploitation on hotel premises;
	Public Private Partnerships	hospitality organisations, labour providers, law enforcement, and local authorities	Operation MakeSafe Campaign: access to training, sharing intelligence, tackle risks of MS, respond to instances of CSE, sexual exploitation, and sex trafficking;

Table 5.3. MSS Evidence of Partnership

5.4 Refined Conceptual Framework

Based on the findings evidenced by the MSSs analysis, I introduce several changes to the Refined Conceptual Framework; while none of the information is removed, I alter some aspects of partnership and I add several complicating factors informed by current industry practices to the context that stakeholders operate in (highlighted in red in *Figure 5.2*).

Membership, Approach, and Outcomes

Considering the findings, I bring changes to three key concepts that emerge from Partnership and Stakeholder Theories in relation to development and collaboration: *membership*, *approach*, and *outcomes*. The conceptual framework (*Figure 3.2*) emphasised the *outcomes* of a partnership as the main concept relating to partnership in based on the Palermo Protocol focusing on prevention, protection, or prosecution (UN, 2000). It emerges from the analysis of MSSs that in fact the focus of a MS partnership is on its *membership* and *approach* rather than its outcomes. The *outcomes* of partnerships presented in both narratives are training, raising awareness, and auditing irrespective on the membership and approach. This has been changed in the Refined Conceptual Framework (*Figure 5.1*) to reflect the desired outcomes of engagements that include industry stakeholders.

Furthermore, I shift the partnership *approaches*. Literature indicates that partnerships seeking to address MS and other complex issues take the form of PPPs, MaPs, or P2P. However, the Risk focused Narrative introduces partnerships with clients and suppliers in the shape of Contractual Partnerships; while the People focused Narrative primarily discusses Transactional Partnerships with NGOs and some instances of P2P and PPPs (examples are listed in *Table 5.3*). The few instances that do provide examples of PPPs in the People

focused Narrative include the Home Office, NGOs, industry peers, and law enforcement agencies, in their membership. However, such engagement focuses primarily on risks of sexual exploitation found in hotels. Therefore, the order in which the approaches to partnership are listed changes and lists Contractual and Transactional approaches to partnership as the main types of partnership. The connection between partnership *approach* and *outcomes* is yet to be explored in interviews, as is the link between *membership* and *leadership*.

Partnership Barriers

The literature points to several *barriers* encountered in the development of partnerships (communication, conflict resolution, resources, and opportunistic behaviour). These barriers are not reflected in the two narratives. Given the limited evidence of partnership development, it is not surprising that organisations do not discuss difficulties experienced in developing such relationships. However, new barriers linked to *zero-tolerance*, and *key roles and functions* are observed. While these are not discussed in a partnership context, it occurs that the industry's zero-tolerance approach to contractors and suppliers can pose barriers to the dynamic of engagement in contractual partnerships. Furthermore, the limited detail concerning some roles and functions may pose limitations to stakeholders engaging in with external actors. These two barriers have been added to the Refined Conceptual Framework in the form of complicating factors to be further explored in stakeholder interviews.

Complicating Factors

The two narratives indicate that companies are situated on a spectrum of interpretations of MS risks: at one end of this spectrum are events companies that do not believe to be operating in a 'high-risk sector' (hence the MS risk denial); at the opposite end are some events venues (primarily hotels) that identify internal risks concerning sexual exploitation along with several supply chain risks. In between those two 'extremes' are events companies and suppliers with nuanced interpretations of risks predominantly associated with supply chains. It is unclear from the statements alone why some companies do not consider that they operate in a high-risk sector while others take the risks of MS very seriously. However, I observe several *complicating factors* in companies' responses to MS. These evidence differences and *consistency* issues across statements regarding *prioritising risk versus people*, *lack of evidence*, *denial of MS risk*, *commitment*, and *compliance*. These complicating factors are illustrated in red in the Refined Conceptual Framework and placed along industry characteristics to further develop the context stakeholders operate in.

Industry Characteristics

The *industry characteristics* nuanced in the literature exploring MS in the field of events and hospitality are inferred in the risk and people focused narratives but not explicitly acknowledged or discussed. These include risks associated with internal operation or supply chains. New findings emerge in the People focused Narrative concerning industry characteristics. These new findings are 'labour intensity' and 'employment and recruitment practices' are added (highlighted in amber in *Figure 5.1*). They are closely linked to 'working conditions' as two distinct areas that carry implications for direct employees and subcontracted workers. Within the People focused Narrative complex supply chains (including downstream supply chains: retail, agriculture, construction, etc) are briefly mentioned, as is reliance on

labour providers. However, the seasonal and transitory nature of the industry are not referenced.

While the key concepts (*Outcomes, Membership, Leadership, Approach, Geographical reach, and Barriers*) informed by Partnership and Stakeholder Theories remain central to this research, the *Industry Characteristics, Working Conditions* and the *Complicating Factors* form the *context* under which stakeholders internal and external to event organisations operate. In line with the research aim and objectives, I use the Refined Conceptual Framework in the upcoming analysis of interviews to explore stakeholders' perspectives on partnerships to address MS and their rationale for those partnerships.

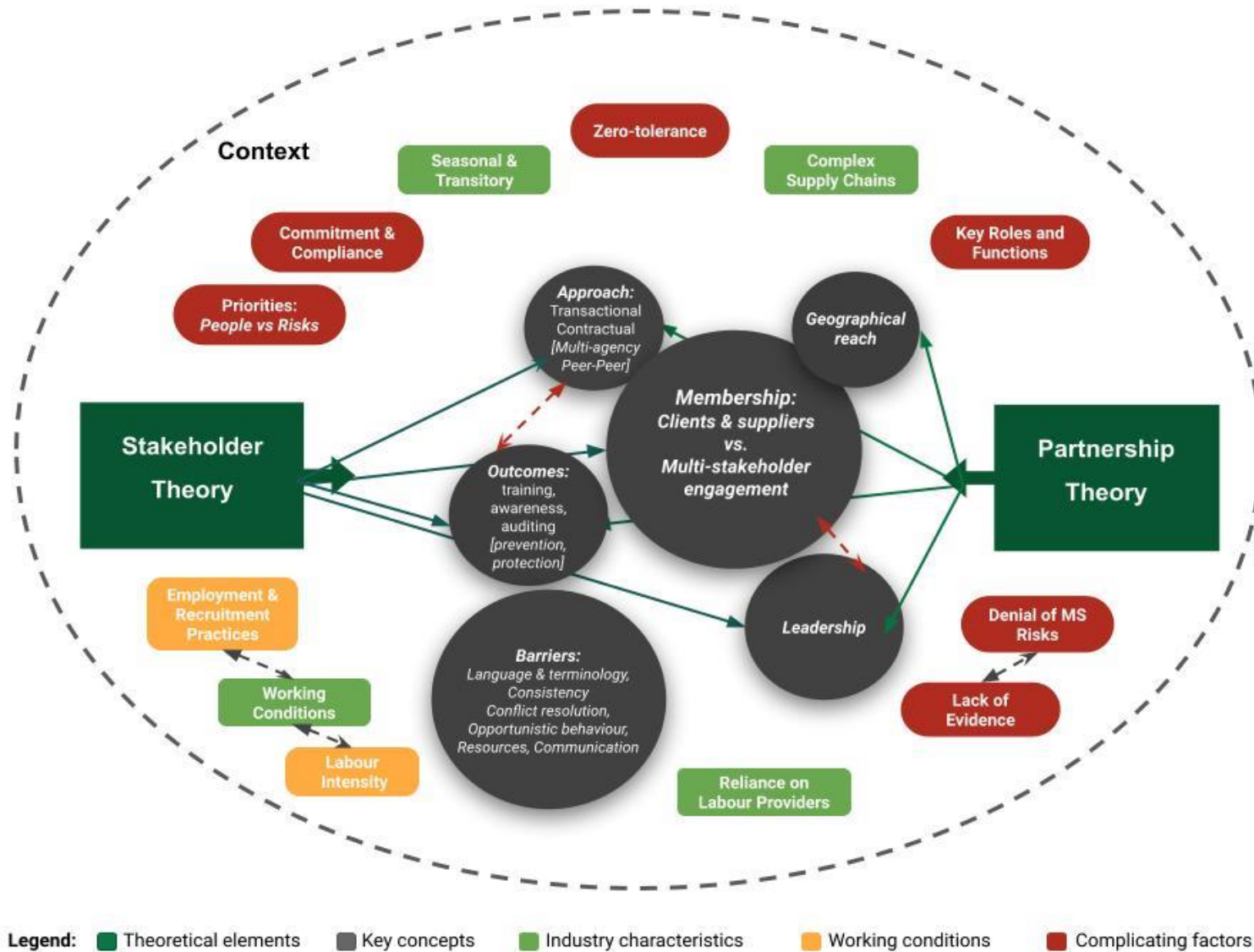


Figure 5.2. Refined Conceptual Framework

5.5 Conclusion

In line with the research aim and objectives, analysing event companies' responses to MS allowed me to refine the conceptual framework and to map stakeholders and function areas engaged in addressing MS. Findings also lead to developing the conversation schedule that ultimately explores the role partnerships can play in addressing MS. The analysis provides insights into the purpose of reporting, perceived risks, and some elements of good practice, but also many areas lacking consistency, and lacunas in reporting. It shows the underlying storyline of vaguely understood MS that leads to distinct ways of responding to it, presented as two narratives focusing on risk and people. In short, neither narrative leads companies to address the impact of their core activities and labour practice. Rather they pertain to CSR or HRM discourse by focusing on external issues against which they can choose to act. Although compliant with the MSA in terms of reporting, with few noted exceptions, the level of detail in the reviewed statements is overall vague.

The analysis evidences two distinct narratives focusing on risk and people. The *Risk focused Narrative* portrays MS as an external issue, largely associated with supply chains. The purpose of reporting is ensuring legal compliance under the MSA, which is achieved in many instances, irrespective of the quality of reporting. In contrast, the *People focused Narrative* portrays MS as a threat to (vulnerable) people facing exploitation. Here the purpose of reporting is linked to organisations' commitment to operating responsibly and the impact organisations have on their people (employees, supply chain workers, and local communities). These perspectives of MS inform the attitudes different organisations have to reporting and are reflected in the content and level of detail of the statements underpinning those two narratives. This shows that the sense making of problems and solutions informs the significance of reporting.

In both the *Risk* and *People focused Narratives* MS and HT are vaguely defined, lacking specific terminology and detail relating to the types of exploitation that can occur internally. The analysis finds that most companies do not identify specific risks which are generically referred to as 'risks of MS'. The *Risk focused Narrative* does not acknowledge any internal MS risks, instead devolves MS implications to supply chains. Within the *People focused Narrative* internal MS risks are acknowledged; this means that some organisations demonstrate more evidence of recognising their role in addressing MS. Still, internal risks are mainly associated with sexual exploitation and sex trafficking at events venues and hotels. Labour exploitation is not specifically discussed but framed in HRM terms as employment conditions and recruitment standards. This indicates a low level of awareness of the labour risks in the sector (such as suppliers, agency workers on zero-hour contracts, and the seasonal nature of work). This leads to non-targeted responses and vague representation of preventive measures, including a zero-tolerance approach lacking engagement with the supply chain and shifting the responsibility. Although labour exploitation is not specifically identified, the *People focused Narrative* acknowledges some shortcomings about the industry described as labour-intensive and largely local where part-time, agency, and casual workers are more typical than the traditional full-time employees. This means that none of the companies addressed specific risk associated with their core labour practice, such as, reliance on migrant workers and practices which include paying recruitment fees, and related costs in

their attempt to reduce the risk to bonded labour (Gold et al., 2015; LeBaron, 2014; Crane et al, 2018).

There is little evidence that the companies take proactive responses to anticipate risks. Moreover, the language used to 'pledge commitment' to address risks or operate ethically is disconnected from the actions companies say they are involved in. The approaches to mitigate supply chain risks are similar in the two narratives presented in both as a sequence of five steps: identify, assess, monitor, reduce, and protect whistle-blowers. The distinction lies in the level of detail supplementing these steps and ties back to how organisations perceive MS. This shows that companies' vague interpretation of MS and their lack of specific risks identification resulting from internal auditing leads to untargeted responses supported by existing policies within the organisation and a zero-tolerance approach (*Risk focused Narrative*). Companies that identify some internal risks and supply chain risks attempt to mitigate those risks through training and engaging in partnerships (*People focused Narrative*).

Across the two narratives there is limited evidence of engagement in partnership, especially in events organisations. In the *Risk focused Narrative*, partnership generally refers to maintaining long-term relationships with their suppliers and third-party auditors as a means to address exposure to the risk of MS occurring in their supply chains. The relationship with suppliers points to Contractual Partnership as a means to ensure supply chain compliance. In line with scholarship (Canzanelli, 2013; Ali, et al., 2019; Shin, Park, and Park, 2019; Yam and Chan, 2015), this relationship is enforced through 'structured contractual documentation' requiring suppliers to commit to complying with legislation and codes of conduct. However, the outcome of this relationship is unclear with regards to addressing MS.

In contrast, the *People focused Narrative* recognises the importance of partnerships and collaborations in the knowledge that no single business could tackle the risks of MS alone. It contains some evidence of Transactional Partnerships, P2P, and PPPs linked to addressing CSE, sexual exploitation, many of which are labelled as 'anti-trafficking' partnerships. Such initiatives expand from a local to a global level and include NGOs, law enforcement, and industry partners in their membership. The outcomes of those are generally training and staff awareness, with a few examples of partnerships seeking to protect vulnerable populations, and two focused on reporting and sharing intelligence. It is important to note, however, that four of those organisations are event venues (hotels), therefore evidence of partnership engagement in the event sector remains scant.

The following three chapters introduce three narratives emerging from the analysis of interviews with key stakeholders internal and external to events focusing on *Compliance*, *Collaboration*, and *Action*.

6 Compliance Narrative

6.1 Introduction

This chapter introduces a narrative focused on compliance reconstructed from conversations with four participants from the industry: Karla, Emilia, Holly, and Amma. The narrative portrays participants' shared experiences and beliefs surrounding the implications of modern slavery (MS): what MS is, where and how it could occur. This narrative emphasises that MS is a distant problem occurring in other countries, other industries, or other business models. MS is framed as a distant issue due to participants' lack of awareness of MS implications for the industry. Still, a passion for the industry is conveyed framed as 'doing the right thing' and concerns for *industry issues* (recruitment standards, lack of engagement with seasonal staff, recruitment fees and payment issues). Participants also share a general compliance mindset as reflected in their reactive stance to legislation, industry standards, and reluctance to engage in partnership. Given the lack of engagement in partnerships to prevent MS at the time of the interview, these four participants are seated remotely from others, as represented in *Figure 6.1*.

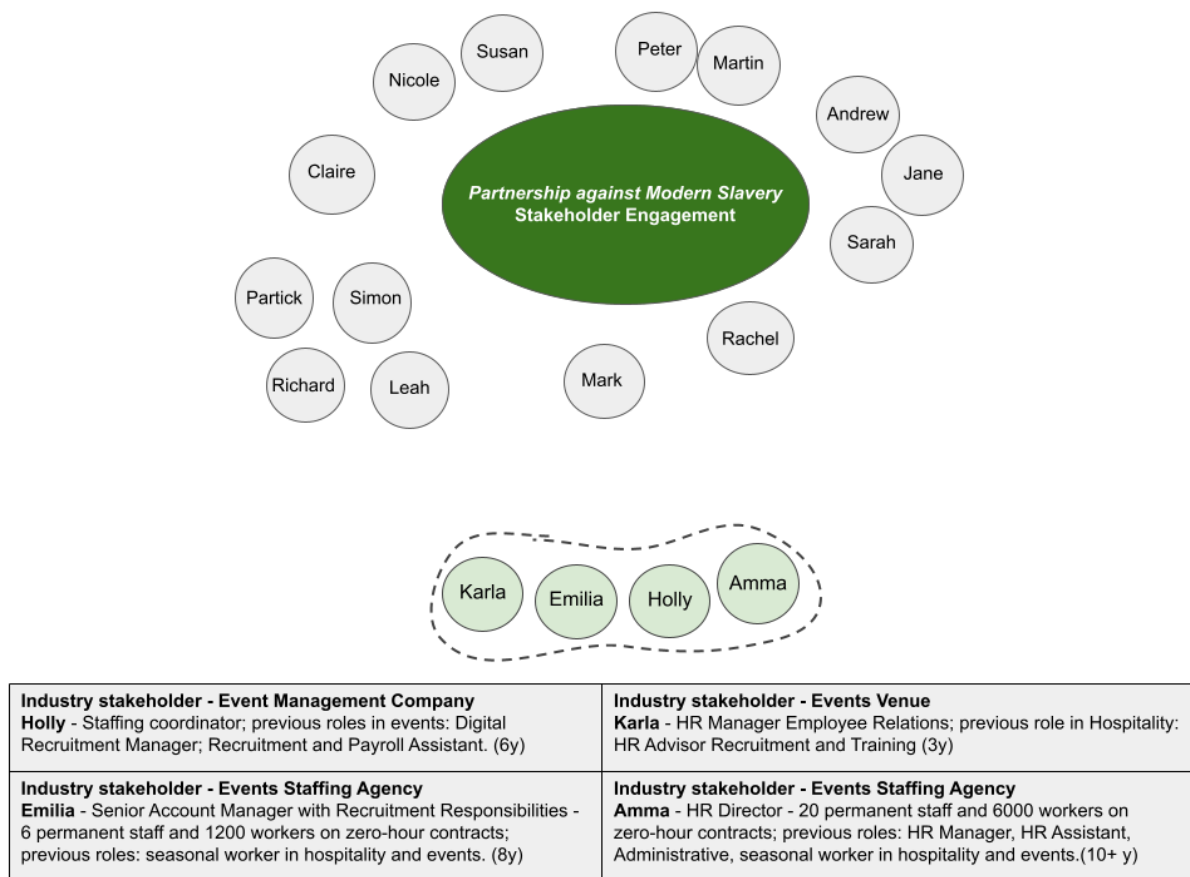


Figure 6.1. Group 1 - Compliance Narrative

Compliance is a key factor driving all internal processes participants follow and is largely based on legal requirements and industry standards. Focused on compliance, this narrative offers a distinct interpretation of what MS is, where it could occur, which industries and business models are impacted, and how the threats arising could be mitigated. The views

shared by these participants pertain to their profession, field of work, and their own values. Participants' views are reflective of their perspective, which is not unique in the industry but part of a broader interpretation of MS in business framed by wider debates on Corporate Social Responsibility (CSR) and Human Resource Management (HRM).

This chapter is structured as follows: *defining modern slavery* conceptualises MS as a distant issue and reflects the level of awareness in the field; *industry characteristics and issues* refers to how participants perceive the industry and translates it into three key areas: recruitment and subcontracting issues, payment issues, and seasonality; *rationale for action* reflects the four participants' attitudes, motivation, and reasoning for addressing the industry issues they experience. This section is divided into three subsections: duty of care, legal requirements, and industry standards. Finally, *relationship development* shows participants' understanding of partnership and their shared reluctance towards engaging in partnerships with some external stakeholders.

6.2 Defining Modern Slavery as a Distant Issue

The compliance narrative emphasises that MS is a distant issue. The narrative emerges from the four participants' understanding of MS and is reflected in the language and terminology they use. A sense of distance emerges in the early stages of analysis linked to the four participants' perceptions of MS, their level of awareness, and their abilities to identify MS risks. For example, participants describe MS as an 'issue', a 'problem', or 'something that could happen' in other countries, other industries, and other business models:

Holly, Staffing Coordinator - Event Management Company: *I really don't know that much about it [Modern Slavery] other than just the general idea that it's about factories in Asia.*

Karla, HR Manager - Events Venue: *To be completely honest with you, I would not think that Modern Slavery would happen in the UK. I would consider this to happen in less developed countries. And to be completely honest, I would not think that it's something that would happen - definitely not in big hotel chains or big companies in general, maybe in smaller ones; but again, I would not think that this is something that happens in the UK simply because there are many laws, regulations on immigration from the Home Office and so I would not really think it's something applicable for the sector...*

Emilia, Account Manager - Events Staffing Agency: *Slavery is such a harsh word, isn't it? I would probably... My mind goes straight to trafficking? specifically sex trafficking? ... I don't know.*

Amma, HR Director - Events Staffing Agency: *... when I think about modern slavery, I think about people... I think the first thing I think of is trafficking. That's one thing. I also think of people that are like domestic servants and you know people that aren't paid well to do a certain job.*

Upon analysing the accounts of Karla, Emilia, Holly and Amma, it becomes apparent that throughout the conversation they are using similar language and terminology, distinguishing them from the rest of participants. While none of the four used terms like: 'risks', 'exploitation',

'abuse', 'crime', or 'human rights', they all speak at length of 'industry issues'. They largely associate MS with HT, which is just one element of the range of issues embedded within the concept. Consistent with findings presented in *Chapter 5*, the language and terminology participants use pertain to wider debates on CSR and HRM where business actors strive for compliance to legal norms set by governing bodies, while framing MS as a management problem (O'Kelly, 2019; Sarfaty, 2020). In lieu of MS specific terminology participants emphasise 'doing the right thing' which they interpreted as: employing a duty of care towards staff, managing payments in a timely manner, and striving for compliance to legal requirements and industry standards. Given its novelty for these participants, MS conforms to their views and practices centred on ensuring compliance through existing means of fair recruitment, pay, and CSR practice.

Perceiving MS as a distant issue denotes a lack of awareness and understanding of the full scope of the MS agenda. Three of the four participants (Karla, Emilia, Holly) state that they were unaware of MS in the UK prior to the interview, much less within events and hospitality. They are hesitant to explain what MS means to them and they openly reflect on their lack of awareness of MS in the industry. Key factors that have led to a lack of awareness and knowledge on the implications of MS to businesses have been linked by other researchers to the hidden nature of MS (Bales, 2007) and its lack of observability (Crane, 2013).

Emilia: ...I'm not as knowledgeable on Modern Slavery as I should be. I think a big problem in the field is the lack of awareness. And ... umm, I would probably include myself in this. I have worked in this field for over six years and, as I mentioned, I moved from a zero-hour contract - working onsite for events clients - to the account manager role, liaising with clients and staff and gradually taking on more and more responsibility including recruitment and training. So, I would say that my experience in the field has included more than just a single perspective and... umm, I suppose at no point was Modern Slavery something that has crossed my mind, even though I had heard about it.

Emilia speaks in a soft, tentative voice as she reflects on the level of awareness in the industry, as well as her own awareness and experience in the sector. She often hesitates before answering questions (marked in ellipses) and her explanations come across as apologetic, particularly when reflecting on her understanding of MS. Holly, who earlier explained that MS occurs in factories in Asia, also reflects on the level of awareness in the field:

Holly: First up, I don't think the sector is knowledgeable about Modern Slavery. I don't know much about it and it wasn't discussed in any of the roles I had in the industry...there wasn't a training, course, or anything on it. I didn't know anything about it. Do I think that it could be a problem in hospitality and events now? 100%.

Holly and Karla expressed a desire to become more knowledgeable about MS as a result of engaging in the study. They both asked where they could access information and other materials to display in their companies and which organisations might be willing to share resources that they could use to increase their own knowledge and that within their company. The language and terminology used to discuss MS is indicative of participants' level of awareness; it pertains to CSR and HRM discourse focusing on the recruitment and people management within an employment context with complex subcontracting channels. Improving the level of awareness about the range of issues included in the MS agenda and that have

implications for the event industry is at the forefront of discussion by MS scholars and practitioners. Public awareness campaigns that inform and educate communities about the risks associated with MS are believed to be one of the approaches to increasing knowledge of MS in the industry (Bales, 2007; Brunovskis and Surtees, 2019). The next section identifies and discusses the implications of common industry issues and characteristics.

6.3 Industry Characteristics and Issues

The compliance narrative focuses on identifying and addressing industry issues. As noted above, after defining MS as a distant issue, participants' language changes from MS to discussing 'industry issues'. These issues relate, in particular, to recruitment and subcontracting labour, managing seasonal staff, payments, and the implications of flexibility. Participants also note problems concerning the use of technology as the main channel for recruitment, training, shift allocation and payments. They believe the use of IT platforms leads to limited engagement between employers and outsourced workers. It is important to note that as the conversations move to 'industry issues' the change in terminology is accompanied by a change in the voices of participants who now speak with increased confidence and passion about their work in the sector.

6.3.1 Recruitment and subcontracting labour

Participants speak about their experience in recruitment which is facilitated by digital platforms. The central aspect for all four is compliance with employment legislation by conducting right to work checks. Karla, Amma, and Holly speak about the importance of thorough recruitment policies and processes, preventing fraud, and attracting 'the right people':

Holly: I think that if everybody's working towards the same goal: just getting the right people in the right jobs with the right paperwork. As long as they've got the right to work checks then the metrics are fine. I mean, and as long as you're being ethical about it and your recruitment strategies are good.

It is of interest that none of the participants associate the lack of work permits to risks of labour exploitation. Lacking right to work paperwork leaves people vulnerable to exploitation and could result in unscrupulous employers undercutting compliant businesses (Gold et al., 2015; LeBaron and Rühmkorf, 2017; LeBaron, 2018). Recently, HMRC (2021) has published extensive guidelines for recruitment practices which informs recruiters that illegal working is linked to forms of labour abuse such as tax evasion, breach of the national minimum wage, and exploitative working conditions, including MS.

IT platforms or apps are used to recruit all staff; however, the recruitment processes differ for internal and seasonal staff. Holly and Karla describe in detail the different approaches for recruiting permanent and seasonal workers:

Karla: [...] we usually use the most common, the most popular sites to advertise our internal jobs... just to prevent fraud or the wrong people applying ...wrong in terms of lack of work permit. For temp work we have a list of preferred agencies, however we are not very strict; so, if for example there is a new app, or a new agency or somebody

saw an advert on the tube or at the bus stop and said 'okay then, I'm going to try this and see if I can find somebody for today, for tomorrow very quickly...' and they seem to be working fine.

Holly's description of the more casual approach to seasonal workers indicates the lack of formal structures or processes within the sector:

Holly: So, the old fashioned 'agency style recruitment' I would say that's going slightly outdated now and people actually prefer to be either going on social media looking for work or mobile apps.

Karla explains that for last minute events their managers use apps or adverts spotted on the London Underground to find staff, and that the HR department are usually notified about the recruitment after the event:

Karla: No, we don't get involved in agency support at all. It's strictly [up] to the head of the department to organise that for themselves. So they decide: 'Okay I have a massive event and I'm predicting that two or three of my people will call in sick because it's on a Saturday and they go out on Fridays'... they have to get that covered themselves. We often don't even know which apps or which agencies they use; we often find out after.

The casual approach to subcontracting labour is presented as flexible and helpful to department managers who need to staff their events. Both Karla and Holly seem unaware of the implications of using a labour provider without a contract in place: the increased risks of withheld payment to seasonal staff, leading to increased risks of labour exploitation for the subcontracted workers. Research indicates that some agencies would minimise labour costs by outsourcing or subcontracting to other agencies with lower labour costs and much of this subcontracting is unregulated posing increased risks for labour exploitation (Crane et al, 2018).

Amma and Emilia, the labour providers in the group, take subcontracting workers and recruiting temporary staff more seriously. They explain that recruitment starts with a telephone interview aimed at evaluating candidates' communication skills, followed by either a 'training and assessment event', 'induction' or a 'recruitment session' for groups of up to 30 new starters, at which point right to work documents are checked (Passports/ ID) and (sometimes) National Insurance documents. The training provided by staffing agencies is often adapted to follow guidelines provided by clients and includes health and safety and role specific information (catering, ticketing, and retail).

Emilia, Holly, and Amma explain that digital staff management platforms create a sense of remoteness between events organisations and their employees. These platforms are used to recruit, train, allocate shifts, and manage payments for seasonal workers. Having an online recruitment, training, and shift allocation system to manage external staff means that the only time labour providers meet their staff is during the half-day assessment and induction event which generally involves large groups. After the induction session seasonal staff are sent out to shifts with limited contact with the labour providers. Emilia reflects on the limited engagement with staff:

Emilia: *I mean, obviously we know them and we are involved, to some extent, but at the same time, I mean this is going to sound bad but, there would just be a name on the screen and we know this person has checked in, we know this person is in that location, but we don't know what their experience was for them to work in that six or twelve-hour shift.*

Employment practices are further complicated by non-compete clauses. As Holly explains, some staffing agencies imposed non-compete clauses to seasonal staff on zero-hour contracts, making staff unable to secure permanent employment with a client or competitor for a minimum of three months from leaving the seasonal role:

Holly: *I don't know if you know the rules with poaching agency staff? You know, they [seasonal staff] said they stayed in the agency even though they wanted to work elsewhere or they wanted to change companies or work directly for us ... but the agency didn't want to lose their staff... so, if we wanted to get someone... [...] we'd have to wait three months; you'd have to not work three months with any agency before we could hire you. So obviously you would lose a lot of money; so, there was a lot of people that didn't want to do that, so they just stayed with their agency.*

Recruitment and subcontracting practices facilitated by technology contribute to creating distance between labour providers and their staff. Outsourced workers are described as 'a name on the screen'. However, participants appear to be unaware of the implications of outsourcing labour and how subcontracting could lead to lower labour standards and reduce the rights of workers (Gold et al., 2015; LeBaron and Rühmkorf, 2017; Crane et al, 2018).

6.3.2 Payment issues

Another industry concern relates to payment issues, which are threefold: late or withheld payments, unpaid breaks, and pressure to lower labour costs. According to the four participants, late payments are a widespread issue in the industry often linked to clients failing to pay labour providers, and other suppliers on time. To prevent payment issues, Amma explains her company has a policy to not supply staff unless they have a contract in place:

Amma: *I would say that staffing companies definitely need to make sure that they have everything in writing in contracts and everything; that [the contract] definitely needs to be one thing that everyone has looked at to safeguard the employee.*

Although this policy is enforced in Amma's company it does not appear to be representative of the industry, given the ease with which Holly and Karla's events teams secure short-term workers via apps and adverts on public transport.

Break allocation is another issue that emerges in relation to payment. Amma and Emilia explain that staff are entitled to a 20-minute unpaid break for every six hours of work, but staff are sometimes not given breaks during busy or understaffed events. The issue is further complicated as clients deduct break time from the staff payment, which would not be reflected on the online system unless workers flagged it, thus placing responsibility on the outsourced staff.

Emilia: *The issues that we did get were in terms of breaks... breaks being deducted from their wage, but not necessarily having been given a break in that particular shift that they were working. So that was an issue on almost every payroll.*

I asked Emilia and Amma how they managed this issue:

Amma: *So, everything got filed and paid on time, everything done right. WE made sure that all our supplies and staff are paid on time, even if our clients are late with payments.*

Pressure to lower labour costs is an additional issue experienced by labour providers:

Emilia: *At the end of the financial year, when normally the national living wage would increase, we would have to re-tender for the rate... so we were only raising it in line with the change in the national living wage; but clients always, it always came back to costs and offers they had from competitors...and said, 'Oh, this staffing agency have given me... given me a lower rate' and they would pressurise us to match it.*

Emilia and Amma overcome this issue by investing in staff training, which is valued by some of their top clients; they also have long-standing relationships with big names in the industry. They acknowledge that for smaller staffing agencies pressure to reduce costs could result in reducing the hourly rates below minimum wages. In addition to late payments, unpaid breaks, and pressure to lower labour costs, Amma spoke about labour providers who charged workers a recruitment fees:

Amma: *We have heard of companies charging workers recruitment fees in the industry and that's awful. That is terrible. So to get around that we simply ask people some questions when we do the telephone interview.*

Throughout their accounts, participants criticised other agencies for withholding payments and charging recruitment fees, however, these practices are not associated with increased risks of MS and labour exploitation. Research indicates that withholding payments and charging recruitment fees increases the risks of labour exploitation (UNODC, 2015; Phung and Crane, 2018); apart from coercion and deception, some of the most common exploitative conditions victims of labour exploitation experience relating to payment are unlawful deduction of costs, delayed or reduced payment, non-payment of overtime, or no payment, and excessive hours (Andrees and Van der Linden 2005; Dowling et al. 2007).

6.3.3 Seasonality or flexibility

Flexibility emerges in the compliance narrative in relation to the seasonal nature of the industry, particularly in relation to labour standards and the types of contracts seasonal workers are offered. Amma, Karla, Emilia, and Holly explain they primarily recruit students and migrants because they are 'more flexible' and, according to them, students and migrants enjoy the flexibility of the industry and the fact that they could 'opt out' of shifts to focus on their studies or return to their home countries for extended periods:

Emilia: *So, people have the option of choosing the amount of work they want, you know? Whatever shifts they don't confirm we allocate to other people who are marked available. So, the system is transparent like that and there is a lot of flexibility for staff.*

In essence they are in control of how much or how little they want to work. They can see the client, the location and rate of pay, which can be higher for some events if they are out of London or longer hours.

Amma: We built our own bespoke system. So that was dealing with... with people that were currently around; so, when people go back to Uni they could put their status to inactive, or whatever and they just go into this pool of people that are still in our books technically, but we haven't sent them their P45. So, there's a lot of seasonal workers who help out, but we don't have to go through the whole recruitment process with them again.

When asked if the zero-hour contracts offered by staffing agencies to seasonal staff ever pose an issue for their staff, Emilia explained:

Emilia: Zero-hour contracts were never really brought up as an issue because staff knew from the beginning - we were very transparent - and they knew from the recruitment stage, and even in the telephone interview that we are only able to offer zero-hour contracts.

Seasonality is perceived as a positive quality by these participants who interpret it as offering flexibility which they believe benefits their staff who can take time for studies or to travel to their home countries. The four participants feel that being transparent about the types of contracts they offer from the early recruitment stages, resolves any potential issues workers may have in reference to seasonality and zero-hour contracts. Literature on the implications of seasonality, however, indicated that industries like events with labour shortages and a high reliance on seasonal workers are prone to a higher risk of MS (Crane et al 2018; Christ and Burritt, 2018). Moreover, organisations unable to directly employ staff due to the seasonal and transitory nature of work (Getz and Page, 2016) cause further reliance on migrant workers and agency staff which provides opportunities for labour exploitation (Paraskevas and Brookes, 2018b).

None of the participants link the industry issues presented above to possible risks of labour exploitation and MS. Consistent with literature, this finding evidences the impact (lack of) awareness has on identifying risks, communicating those risks, and taking appropriate action (Bales, et al. 2015). Furthermore, lack of awareness coupled with the use of imprecise terminology leads to conflating risks of labour exploitation with other issues hindering progress towards preventing MS. This means that HRM language and terminology used to describe the conditions in the industry neutralises and dilutes the extent of the problem and the sense of urgency warranted by it (McVey et al., 2022; Merry & Levitt, 2019). Clearly distinguishing MS practices is fundamental to implementing preventive practices and relies heavily on identifying specific exploitative practices that can occur in different business models (New, 2015; Ollus, 2015; Cockbain et al, 2018). To address this MS researchers and practitioners advised increasing awareness by prioritising training (Kempadoo et al, 2016; Anti-Slavery International, 2018). In the next section I present participants' experiences and reasoning towards addressing industry issues and their shared reluctance towards engaging in partnerships

6.4 Rationale for Action: Doing the ‘Right Thing’

This compliance narrative emphasises the importance of ‘doing the right thing’ and ‘treating people fairly’ as means of addressing industry issues. This is reflected in how participants Amma, Emilia, Karla and Holly express distinct priorities and drivers from those of other participants engaged in this study (introduced in the forthcoming chapters). Compliance is a key factor driving the processes the four participants follow and this is largely based on legal requirements and industry standards. This section explores participants’ reasoning towards addressing industry issues and is structured in three subsections: *duty of care* presents participants’ moral obligations to address industry issues; the *legal requirements* they face relating mainly to recruitment and MS reporting, and the *industry standards* they need to uphold.

6.4.1 Duty of care

Although the four participants do not discuss MS prevention or addressing the risks arising from it, they talk passionately about addressing the industry issues. They emphasise the importance of ‘doing the right thing’ and ‘treating people fairly’. In practice ‘doing the right thing’ translates into several solutions informed by HRM practice and it prompts the four participants to reflect on their own ethical responsibilities and values:

Emilia: It’s just about treating people fairly. Giving them work and staying in touch to know they’re treated properly by the clients. [...] We have a duty of care to our staff. So, I don’t know how other places treated their staff, but I know that we... we really tried to be the company that would always think you know we stick up for our staff and try and give them everything they needed before they went to their first shift.

Amma: I think the people in our office, we’re all really passionate about the industry and we’ve got high morals, and so it’s important for all of us to do things right. Because we’re all like that everything is compliant and above-board.’

While they use similar language when talking about employee responsibility and duty of care, it is important to distinguish who participants are talking about when they say ‘our staff’. Labour providers (Amma and Emilia) use the terms ‘our staff’ or ‘our people’ when speaking about the seasonal workers employed by their agencies. Meanwhile, Holly and Karla differentiate permanent workers, referred to as ‘our staff’, from the seasonal, outsourced staff. This is particularly relevant as they talk about employee wellbeing and responsibility.

Duty of care for seasonal workers generates a debate about who is responsible for staff wellbeing. Participants have conflicting views on who is responsible for staff wellbeing. Labour providers view it as the responsibility of clients to ensure that seasonal workers are treated fairly and that supervisors and managers (often employed directly by clients) exercise a duty of care to seasonal workers:

Amma: After recruitment we might see them onsite, but ultimately, we put them [seasonal staff] in our clients’ hands. So, our agreements with our clients had to be really specific in what we expected from them. So, I think there’s a lot of terminology within the contracts to say what they needed to do in order to keep our... our staff safe while on site.

Emilia, who earlier talks about having limited contact with staff and the platforms reducing people to 'a name on the screen', reflects on duty of care:

Emilia: I personally think we should have more feedback and more questionnaires or surveys put in place and to speak to the workers to see if they're being treated fairly and what needs to be changed or how it can be changed, because they're the ones who are on site and work the most.

In contrast, Karla and Holly offer a different view on staff responsibility, from the perspective of companies (events venue and event planning) who regularly use outsourced labour for their events. They see employment issues as something that occurs through recruitment channels and wages payments which are under the control and responsibility of the staffing agency. When issues are raised by seasonal staff working onsite, they liaise with the subcontractor thus placing responsibility on the agencies:

Karla: [agency workers] very often come to us complaining about how a manager that spoke to them [...] or maybe there was something wrong with their payslip that we can't even view or have access to; and in theory they shouldn't be discussing these things with us because we are not their employer, however I think it's in our nature as people in HR that we just want to help absolutely everybody whoever it is...so first of all we listen to them from start to finish. So, once we have spoken to the employee with a concern, we then call our head housekeeper who is employed directly by us. We then obviously pass on the information and give the feedback and then she addresses it with the subcontractor.

Research shows that subcontracting could lead to lower labour standards and reduced rights for workers (Gold et al., 2015; LeBaron, 2014); although poor working conditions do not constitute forced labour, they could overlap with certain elements of forced labour. Businesses have received criticism for absolving themselves from any responsibility by placing the ultimate responsibility onto their external suppliers to ensure compliance (LeBaron, 2014).

I asked all participants how MS responsibilities could be incorporated to improve practices in their organisations and the industry. Participants believe that MS attributions *could potentially* sit within existing positions: senior actors including procurement and HR directors could set the appropriate policies; recruitment and HR managers have the duty to perform right to work checks; employees and all other people working for the company could identify signs and notify appropriate management. Participants' views of attributing responsibility are very similar to findings emerging from *Chapter 5* whereby internal stakeholders' responsibility is attributed based on key function areas; however, a discrepancy is observed: the *risk and people focused narratives* suggest that practices and MS responsibilities are already in place relating to supply chain compliance, whereas the labour providers who are working with several organisations listed in the previous chapter suggest otherwise.

6.4.2 Legal requirements

The legal requirements that the four participants discuss relate to employment legislation and the Modern Slavery Act (MSA). As presented earlier, participants relay their experience in recruitment and emphasise right to work checks, to ensure legal compliance. As Holly explains below:

Holly: If you don't see the... the real thing there is a risk that it could be a fake passport, for people that have restrictions to work in the UK obviously; and if the HMRC did an audit you could get in trouble if you don't have records of it [right to work checks].

According to Chartered Institute of Personnel and Development (CIPD), the professional body for Human Resources (HR) and People Development, the key areas of law affecting recruitment and staff selection include discrimination, the right to work in the UK, criminal records checks and data protection. When recruiting staff, CIPD advises employers to understand and comply with legal obligations (CIPD, 2021). To ensure their recruitment and selection procedures comply with the law Holly and Amma reference their partnership with HMRC (this is presented in more detail in the *Relationship Development* section).

Upon discussing the legal requirement to report under the MSA, Holly feels that the industry would respond better if MS legislation resembled General Data Protection Regulation (GDPR) requirements. The Data Protection Act (2018) is the UK's implementation of the EU GDPR. According to legislation, all organisations using personal data must follow strict rules called 'data protection principles'. Failure to comply can result in fines of up to up to €20 million, or 4 percent of worldwide turnover for the preceding financial year, whichever is higher (The Data Protection Act, 2018).

Holly: If the government passed some kind of law, something like the GDPR - everyone took it very seriously and suddenly everything had to be double checked and make sure it's compliant. There's no reason why they can't bring in another legislation like that. But that would need to carry stricter... stricter consequences for a company that's regularly breaking the law.

Of the four participants above, only Amma's company was under an obligation to produce a MSS under Section 54 of the MSA, at the time of the interview. The other three organisations fell below the threshold to report; however, although Holly and Karla were unaware of it, their previous employers were actively reporting and producing yearly MSS under the MSA (statements which were analysed in *Chapter 4*). An inconsistency is observed here, in inspecting the actions and policies described in statements produced by their previous employers. For instance, Karla's previous company states in their MSS that they provide training to all staff concerning MS risks. Karla recalls a 'zero-tolerance policy', but has not linked this to MS:

Karla: In the previous hotel where I worked, there was a zero-tolerance policy, which included child abuse, prostitution, exploitation of people [...]

Amma is the only participant in this group aware of the MSA. She remembers being involved in producing the MSS in 2015 when the legislation came into effect. She compares MS reporting to GDPR unfavourably, explaining that the GDPR legislation required internal departments to work collaboratively on implementing new processes in their respective teams. In contrast the MSS was produced with the help of an external insurance provider:

Amma: [back in 2015] I was involved in producing the statement. It was quite an exercise, because it was like trying to get in touch with the right people to get it done, and the way it worked... ummm. So, with our insurance - and I think our insurers were Hiscox - so we ran everything by them, they gave us templates for everything. Since

then we had, like, a company that used to just look after all of our IT stuff and they just made sure that it was always there and that it was updated.

This offers a potential explanation for the limited yearly updates observed in the analysis of statements. Using templates supplied by third-parties sheds light into the many similarities shared by statements produced by different organisations in the field. The limited involvement from internal senior actors raises questions over how seriously MS is perceived in those organisations. Moreover, it raises concerns over the effectiveness of processes said to be embedded in the relevant functions given that MS remains unknown in some organisations producing those statements. This finding also fuels the criticism of MSA's inability to change corporate behaviour and hold companies accountable (Nolan and Bott, 2018; Stevenson and Cole, 2018; Wen, 2016). Reports from the Walk Free Foundation (2019) found that the industry is failing to address the risks of MS in their direct operations and supply chains due to a lack of commitment to prioritise MS from senior stakeholders in the sector. Outsourcing MS reporting, similarly to outsourcing labour, is another act that distances companies from MS responsibility which is devolved to external actors. This reinforces the narrative that MS is a distant issue.

6.4.3 Industry standards

In addition to legal requirements, participants also seek to comply with industry standards. According to them, industry standards relate largely to maintaining a favourable image of the company within the industry by developing policies and adhering to those of their clients. They allude to codes of conduct called 'terms' agreed with clients, although it is unclear what the terms entail and what their consequences are should companies, or their own suppliers fail to comply. Since the MSA came into effect companies have been advised to review or update existing corporate policies in relation to MS and HT. The TiSC Guidance (HM Government, 2021) states that smaller companies may be asked to produce statements or develop policies setting out their approach to tackling MS, especially if they are bidding for contracts with larger businesses above the threshold. Although the companies the participants worked for work with large names in the industry who report on MS (including several companies whose statements were analysed in the previous chapter), none of the participants knew of any corporate policies relating to MS. In fact, they suggested that their policies are not very well developed, contrary to findings from MSS that emphasised that internal processes relating to MS prevention are sustained by policies:

Karla: In the previous hotel where I worked, there was a zero-tolerance policy, which included child abuse, prostitution, exploitation of people [...] however, in my current hotel that's not in place and it would be very difficult to implement; because we have a nightclub, and we have a very popular bar, we have a popular rooftop terrace, so for us to know who is visiting a bedroom and who is not, would be absolutely impossible.

As Karla explains the differences between her previous and current company, once again she stressed the 'flexible approach' to policy development and the freedom this granted their staff to adopt practices they see fit:

Karla: So, in terms of policies in general whatever policies, they are very tiny, very short and there are only a few of them really; so, there is a lot, a lot of freedom given to the managers, to supervisors and actually to staff themselves.

Amma speaks with uncertainty of the policies they have in place to address the risks of MS:

Amma: I remember that up until a few years ago, there was a modern slavery clause that was just put into a handbook and I think it was an ethics policy that we had.

Emilia on the other hand believes that having a dedicated MS policy in place would give their company guidance to approach issues relating to subcontracting labour:

Emilia: [...] would really help if the company had something in place that was specific to modern slavery to guide us in our approach with workers and clients and suppliers as well.

The findings emerging from MSS analysis suggest that supply chain compliance is conducted by some of the event organisations that participants collaborated with to ensure all companies in their supply chain uphold their commitments. From the four participants' perspectives, their companies seek to establish and maintain long-term relationships with trusted clients and suppliers, to ensure that all parts of the supply chain acted in accordance with applicable laws. While a zero-tolerance approach is intrinsic to the risk focused narrative in the relationship between companies and their suppliers, it was not referenced by any of the labour providers. Neither is continuous engagement with suppliers by developing action plans and monitoring results to remediate practices in supply chains, as recommended by MS NGOs and trade unions (ETI, 2018).

A large part of adhering to industry standards is maintaining a favourable image of the company within the industry according to Emilia and Amma:

Emilia: I think there has been a lot more focus on employees' rights over the last few years. And we've always been scared of how people would perceive us if we did anything wrong. We then look after everyone. And I hear the word duty of care a lot.

Regulation and concerns about labour rights in the UK have contributed to the rise of ethical responses such as 'duty of care' from industry actors; participants talk about responding to industry issues by 'doing the right thing' thus referring to social or ethical concerns (O'Kelly, 2019). However, the industry incorporates labour rights within familiar corporate practice thus rendering the risks associated with MS as commercial or reputational risks, and not as social or ethical concerns (O'Kelly, 2019). The reference to employees' rights and duty of care also points to tension between law and ethics in the compliance narrative. Furthermore, studies confirm that many companies mitigated corporate social risks in supply chains to avoid risks of reputational damage incurred by companies after being exposed in the media for dismal labour standards in their offshore supply chain (Croom et al., 2018; Cunha et al., 2019). As employees' rights become of interest in the workplace, businesses need to adhere to legal and ethical standards within the industry for fear of how the company would be perceived. Maintaining the corporate image and reputational risks are also discussed by participants in the *Collaboration* and *Action Narratives* who frame it as reputational damage and identify it as the main factor determining the industry to develop preventive measures to address MS.

6.5 Relationship development

In the final section of this chapter, I look at participants' understanding of partnership and their shared reluctance towards engaging in partnerships with some external stakeholders and I

present their views and motivations to potentially develop relationships with other stakeholders. Amma, Holly, Emilia and Karla discuss the importance of developing partnerships with clients and suppliers. Upon exploring the implications of those relationships, it emerges that mitigating the risks associated with MS is not one of the objectives of those relationships.

Emilia, Account Manager - Events Staffing Agency: *The driving force in developing partnerships, I think, has been drafting certain agreements between the company and the clients, I suppose, so that we're both on the same page and then they know what we do and how we operate.*

Instead, participants discuss collaborating with clients and suppliers to strengthen their relationships and ensure supply chain compliance. The relationships described by participants are in fact contractual partnerships studied in supply chain management research (Canzanelli, 2013; Ali, et al., 2019). Therefore, none of the four participants is engaged or seeking to engage in partnerships against MS at the time of the interview.

Aside from the relationship with clients and suppliers, Karla and Emilia believe a potential partnership with the Home Office would help them ensure legal compliance to recruitment obligations and to reduce risks of uncovering potential issues through auditing:

Karla: *I think a partnership with Home Office sounds quite interesting, actually. And I think a big word that always gets our people panicking is auditing; when they hear an external auditor is coming to check what we're doing, what we're not doing, I think that would work.*

While this potential engagement informs a different approach to partnership, described in literature as a Transactional approach to Partnership (Sockett, 1997; Clayton et al., 2010; Thompson and Brent, 2017), the scope of it is still centred on compliance rather than addressing MS. Moreover, the nature of the relationship is opportunistic which constitutes a barrier to effective/ meaningful partnership engagement (Nottingham Rights Lab, 2018a; Liu et al, 2014). Transactional Partnerships between events companies and the Home Office are also referenced in the *People focused Narrative* although the nature of the engagement and whether MS is the scope of those relationships remains unclear.

While engagement with actors who can ensure legal compliance is viewed favourably by participants, they demonstrate reluctance to engage in other types of relationships including Peer to peer (P2P) and Public Private Partnerships (PPP). Relationships with peers, referred to as competitors, are deemed unsuitable for event and hospitality organisations due to distinct business models and corporate practice. Emilia and Amma state that, unlike other labour providers in the industry, their companies operate ethically by aiming to 'treat people right': they offered more substantial training, they only worked with clients under a contract, and they would not compromise staff wages to succumb to clients' demands to lower labour costs. Therefore, they do not believe that engaging with others in the industry, who lack those standards, would be lucrative.

Another interesting reason is the fact that a relationship with peers might not be taken seriously:

Karla: *I don't really think it would work if we were to pair up with other hotels, simply because of our mentality and how our people think. It would be just 'oh yeah another one of those meetings that I have to attend'. I think it would need to be a little bit stricter.*

I asked Karla to explain what she meant by 'stricter', and she came back to her point regarding developing a relationship with the Home Office. For her, the partner needed to be more knowledgeable for the relationship to be worthwhile, hence reinforcing the benefits of the relationship for the organisation. Participants' views on partnerships raise several questions relating to corporate practice and competitiveness. It also leads to a barrier for P2P and PPP engagement to address the risks associated with MS.

This narrative emphasises compliance as a focus of addressing MS and industry issues. Compliance is the core reason for partnership engagement. Moreover, participants exhibit opportunistic behaviour and believe they should engage with clients and suppliers to develop agreements and improve their business relationship; furthermore, they believed a relationship with the Home Office would validate their recruitment practices and safeguard their companies from unfavourable auditing outcomes. The lack of partnership engagement against MS shares similarities to findings presented in the *risk focused narrative*, demonstrating that the industry is not prepared to engage in mutually beneficial relationships with external actors

6.6 Conclusion

Central to the compliance narrative is the belief that MS is a distant issue occurring in other countries, other industries, and other business models. A sense of distance is also observed in the practices recounted throughout participants' accounts: devolving staffing responsibility to agencies; recruiting and outsourcing labour via digital platforms which reduces workers to 'a name on the screen'; and outsourcing MS reporting to external actors. The distinct interpretation of MS as a distant issue relates to participants' lack of awareness of the specific risks associated with MS in events and hospitality. The language used to discuss the implications of MS for the industry pertains to CSR and managerial discourses used to describe the conditions in the industry. Thus, MS risks are translated into industry issues framed as: *staff wellbeing, payment issues and pressure to lower labour costs, fear of auditing, and flexibility*, to which they propose a set of solutions: *duty of care, doing the right thing, and compliance*.

The use of unspecific terminology neutralises and dilutes the implications of MS for the industry and the sense of urgency warranted by it. This also means that labour and sexual exploitation risks are not acknowledged at any point and preventive mechanisms are not understood. Participants appear to be unaware of the implications of outsourcing labour and how subcontracting leads to lower labour standards and reduces the rights of workers (Gold et al., 2015; LeBaron, 2018; Crane et al., 2018). Instead, participants share concerns for recruitment standards, lack of engagement with seasonal staff, recruitment fees, and payment issues all exacerbated by the use of IT platforms. These concerns are addressed by 'doing the right thing', in which compliance is a key factor driving internal processes.

Compliance carries both legal and ethical dimensions. Companies also seek compliance to industry standards which means developing codes of conduct and maintaining their corporate

reputation. Legal compliance relates mainly to recruitment, as MS reporting is completed via templates supplied and maintained by third-parties. Conducting thorough right to work checks is of essence in maintaining compliance to recruitment legislation. This is motivated by a desire to do the right thing and fear of auditing and reputational damage; however, none of the participants are aware that 'illegal working' is linked to forms of labour abuse and rendered people vulnerable to exploitation (HMRC, 2021).

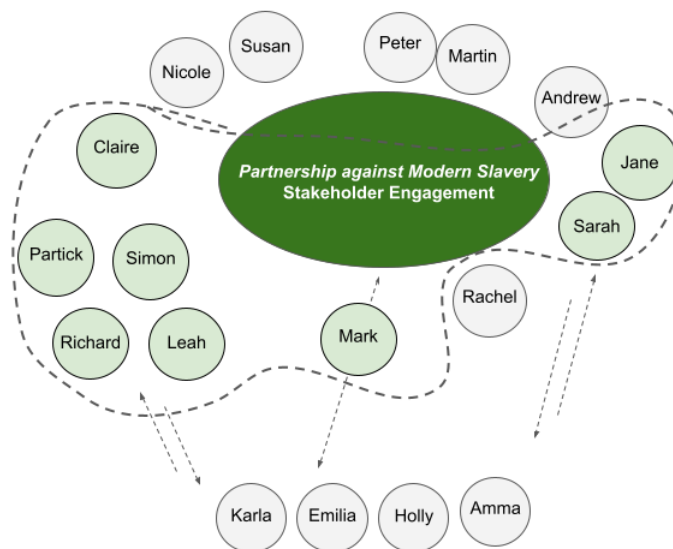
Duty of care refers to ethical responsibilities to address industry issues. This leads to two unanswered questions: who is responsible for seasonal staff? and how can MS responsibilities be embedded in organisations? Industry stakeholders have distinct views over responsibility for seasonal staff. Labour providers believe event companies are responsible for seasonal staff due to their prolonged contact during shifts. Those who outsource staff, although sympathetic to seasonal workers' issues, believe staffing agencies are responsible for solving any issues as formal employers. This means that neither staffing agencies nor the companies they worked with take responsibility for the issues seasonal staff face. The second question relates to attributing MS responsibilities internally. Findings from MSSs suggest that responsibilities are in place in organisations to address the risks of MS and inform industry practices. However, such responsibilities are unknown to participants. MS responsibility is not in place in any of the organisations participants currently or previously worked for. This inconsistency raises questions over the extent to which practices reported in MSS are implemented in organisations.

Finally, evidence of partnerships to address MS is largely missing from this narrative. At the time of the interview, participants were not engaged in any collaborations to address MS and shared a reluctance to engage in *Peer to Peer* collaborations with competitors due to operational differences and the fact that a relationship with peers might not be taken seriously. Instead, compliance is the core reason for partnership engagement. Participants exhibit opportunistic behaviour and believe they should engage in *contractual partnerships* with clients and suppliers to develop agreements and improve their business relationship; furthermore, they believe that a potential *transactional partnership* with the Home Office would validate their recruitment practices and safeguard their companies from unfavourable auditing outcomes. The lack of initiative to develop preventive measures and engage in partnership shows that events companies are reactive to the legislation and industry standards and as such demonstrate compliance behaviour. While from the four internal stakeholders' perspectives, compliance is a term that reflects their efforts and commitment to uphold legal and ethical requirements, compliance behaviour attracts negative attention from scholars in the field (Monciardini et al., 2019) and from external stakeholders engaged in this study whose views are presented in the next two chapters.

7 Collaboration Narrative

7.1 Introduction

This chapter introduces a narrative focused on collaboration reconstructed from the accounts of eight participants: Sarah, Jane, Richard, Leah, Patrick, Simon, Claire, and Mark. Participants are a mix of internal and external stakeholders from a range of organisations including NGOs, Modern Slavery Consultancies, Local Authority, and one Staffing Agency. The narrative emerges from their shared experiences and beliefs surrounding the implications of modern slavery (MS): what MS is, where and how it can occur, and how it can be prevented; as well as their emphasis on the need for collaboration. MS is perceived as a human rights issue requiring a collaborative approach from multiple stakeholders. The eight participants are knowledgeable of specific risks associated with labour and sexual exploitation within the events and hospitality industry. They are also familiar with the industry's interpretation of MS and industry issues (recruitment standards, lack of engagement with seasonal staff, recruitment fees and payment issues).



MS Consultant: Patrick - Practice and Policy Coordinator (4y) Expertise: Retail and Hospitality	Local authority: Claire - Risk and Exploitation Coordinator (10+ y) Previous role: Adult Safeguarding Coordinator
MS Consultant: Simon - Modern Slavery Advisor (2y)	Industry stakeholder: Mark - Compliance Manager (3y) Staffing Agency
MS Consultant: Leah - Programme Director (3y) Expertise: Hospitality and Events	NGO Representative: Jane - Project Manager (4y) Expertise: Tourism and Hospitality
MS Consultant: Richard - Chief Executive (10+ y) Expertise: Food and Agriculture	NGO Representative: Sarah - Manager (6y) Expertise: Tourism and Hospitality

Figure 7.1. Group 2 - Collaboration Narrative

Participants have extensive experience and a proactive approach to MS prevention, and they believe the industry to be reactive. Collaboration is believed to be the solution to addressing the risks arising from MS, although barriers are identified. Participants have a mediator approach to partnership coordination: they seek to bridge the gap in many of the debates differentiating groups one and three. Their engagement in partnerships against MS with

multiple categories of stakeholders means that these eight participants are seated at the partnership table, while arrows are used to illustrate their constant attempt to collaborate with the industry and invite them to join partnership discussions, as represented below in *Figure 7.1*.

This chapter is structured as follows: *defining modern slavery* illustrates that MS is perceived as a human rights issue and showcases the labour practices in the industry which are believed to heighten the risk for labour exploitation. It also emphasises the significance of language and terminology used to debate MS, particularly when collaborating with industry stakeholders. *Industry concerns and rationale for action* unpicks the reasoning participants create to justify their view that accountability needs to be increased to address risks associated with labour exploitation. This section is divided in three subsections: *need for visibility* addresses the hidden nature of MS and stresses the significance of creating awareness by collaborating with businesses; *reputational damage* explores participants' views on the stance companies take to addressing the risks of MS; and *accountability* is discussed in relation to industry stakeholders' compliance mindset. Finally, *partnership development* presents participants' views on collaborating with the industry, how stakeholders develop partnerships, and the barriers they encounter. This section reflects participants' experiences of engaging in multi-agency partnerships and industry networks.

7.2 Defining Modern Slavery as a Human Rights Issue

The collaboration narrative emphasises that MS is a human rights issue requiring a collaborative approach to address it. This section presents the eight participants' interpretation of MS as a human rights issue, its implications for the industry, and the significance of language in developing collaborative approaches with the industry. It explores labour practices in events and hospitality that participants believed could lead to exploitation. Human rights emerged as a dominant concern throughout this dialogue:

Mark, Compliance Manager - Staffing Agency: *I think if you, if you try not to overthink Modern Slavery, if you just see it as human rights issues, if you treat the human rights of all your staff with the utmost importance, that's a nice place to work.*

The depiction of MS as a human rights issue continues throughout the accounts of participants in this group as they discuss the industry's response to MS and the collaborative efforts required to address it. This means that these participants situate other forms of human or labour rights infringement alongside MS on the basis of 'sufficient similarity' (Quirk, 2007) or what has been called the 'soft end' of defining MS (ILO, 2008; Skrivankova, 2010). When discussing the implications of MS, human rights, workers' rights, and MS appeared to be conflated at times; while there are many different characteristics that distinguish MS from other human or labour rights violations (Tallmadge and Gitter, 2017), an important distinction is that workers' rights are more collective and specific to address particularly in a business context. However, in this narrative human rights are tagged on an array of issues concerning MS without a referent definition.

Participants speak with passion and confidence as they define MS and discuss their own experiences of working within their organisations and with industry actors on prevention. They describe MS as a 'human rights issue' and use specific terminology to refer to the implications of labour and sexual exploitation in the industry. They often use terms like: 'risks', 'exploitation',

'abuse', 'ethical labour', 'due diligence', 'accountability' and discuss the implications of subcontracting labour at length.

Their narrative conveys a firm belief that the human rights of people working in events and hospitality organisations are vulnerable to abuse, mainly because of practices associated with labour exploitation. Participants explain that the abuse of employees is commonplace through practices such as: charging recruitment fees, contract deception leading to bonded labour, withheld wages and benefits, unpaid overtime, retention and control of passport and bank accounts, and poor workers' living accommodation. Although, zero-hour contracts are not mentioned. Participants associate the risks with the direct operation of events and hospitality businesses and their supply chains:

Patrick, Practice and Policy Coordinator - MS Consultancy: *We always talk to business that they've got three different risks: their workforce risk, their supply chain risk, and their customer risk - and customer risk is only really applicable to hospitality and financial services*

Simon, Modern Slavery Advisor - MS Consultancy: *[...] talking about the end company, the company that actually runs the event, their primary issue is labour exploitation, rather than sexual exploitation.*

Key to this narrative is the belief that collaborating with the industry is the best mechanism to protect the rights of people working in events and hospitality and improve the level of awareness in the industry. All eight participants are engaged in partnerships with businesses in events, hospitality, and other industries. Communication is central to those partnerships and collaborations. This becomes apparent as participants discuss their experience of interacting with businesses and the industry's response to MS, when many use the terminology of 'risks' and 'issues' interchangeably. As the change in terminology becomes apparent in our conversation, I ask several participants to comment on the differences in language perceived when collaborating with the industry. Jane, Patrick, Simon, and Leah explain the need to adapt their language according to the departments they communicate with. Corporate Social Responsibility (CSR) departments are described as the most passionate about human rights. According to participants, CSR professionals understand the implications of MS, but lack the power to enforce change without approval from senior management. In their interaction with senior business actors, however, participants talk about the importance of 'speaking the same language as businesses' and 'refraining from using human rights terminology'.

Jane, Project Manager - NGO: *I remember one of the directors [in the hotel industry] saying, it wasn't really about using human rights language with, you know, CEOs and senior level management, but it was about framing it in such a way that they would understand without necessarily calling it human rights. So being aware that this is a human rights issue or a labour rights issue, but framing it as recruitment, and talking about recruitment and fair recruitment.*

Jane, Sarah, Simon, Leah, Patrick, and Richard explain that many industry stakeholders are either unaware or unwilling to use appropriate terminology when discussing MS, instead they use vague terminology pertaining to management discourse to refer to the range of phenomena associated with MS. This observation is supported by the *Compliance Narrative*, where labour practices that intersect with MS such as subcontracting and employment

conditions are described as 'industry issues' and framed using HRM discourse focused on practices relating to people management and employee relations. The practice is explained in scholarship as translating the meaning of MS (Sarfaty, 2020) and human rights (McVey et al., 2022; Goethals, 2019; O'Kelly, 2019) when brought into a corporate space by framing them in familiar business terms to facilitate their integration (O'Kelly, 2019; Merry and Levitt, 2019). Translation entails abandoning explicit language and terminology linked to MS and exploitation and using more general, neutral language of CSR and HRM such as risks, fairness, or equality (O'Kelly, 2019).

Strategically adapting their discourse when collaborating with the industry proves both necessary and successful for the participants in this group. Thus, translation becomes a significant element of successful partnership, reinforcing the collaborative narrative. In response to the industry actively avoiding the language of human rights, and generally using less emotive terms to describe MS, participants adapted their discourse to 'speak the same language as businesses' and facilitate communication which allows them to collaborate with industry stakeholders. This also means that the interpretation of MS in business is left to private actors, guided by third parties and service providers such as NGOs, auditors, and consultants (Sarfaty, 2020).

However, this communication strategy has received extensive criticism from MS researchers for continuing to perpetuate uncertainty over what really constitutes MS and posing barriers to identifying specific exploitative practices that can occur in different business models (Quirk, 2007). Using accurate and consistent terminology is believed to be fundamental to implementing preventive practices (New, 2015; Ollus, 2015; Cockbain et al, 2018). As seen in the *risk* and *compliance narratives*, the ability to identify the risks of MS and explicitly label risks using MS terminology proves to be a challenge for most industry stakeholders, which leads to un-targeted responses and vague representation of preventive measures.

7.2.1 Labour practices and risks of exploitation

This section articulates the implications of labour exploitation risks identified: the organisation of labour, its vulnerability and what companies should do to prevent exploitation. According to participants in this group, labour exploitation is the main threat associated with events and hospitality, exacerbated by the prevalent use of agency workers, migrant workers, and subcontracting that they believe pushes responsibility from clients to subcontractors. Participants reflect on the severity of the risks of labour exploitation and provide solutions to mitigate them. Solutions include risk-mapping, due diligence, training, awareness raising, policies and processes, while collaborating with peers and external actors is believed to be key to mitigating labour risks:

Patrick: Essentially our argument is always that as soon as you use agency workers, or these subcontractors, you are adding another element, which is pushing the accountability further away from the employer to employee.

Simon: Companies that use agency workers are increasing the chances of workers having paid a recruitment fee at some point down their employment process, which then leads them into debt bondage [...].

In assessing risks of exploitation Sarah, Richard, Simon, Claire, Mark, and Leah largely focus on indicators relating to recruitment (how migrants are recruited, whether they are charged recruitment fees), wage payments (whether wages are paid and to whom), and employee welfare (access to training and grievance mechanisms). To address the risks associated with migrant workers' recruitment one labour provider seeks to raise awareness among vulnerable populations:

Mark: [...] we produced some information - sort of posters - which basically was a one stop shop for anyone who was looking to come to the UK to work. It had all the information that they would need: about the fact that it's free for bank account, free for National Insurance Number; if you're working x amount of hours a week, this is how much you should be picking up; on minimum wage; the cost of rent, groceries - all this kind of stuff – transport; to try and prevent anyone from falling victim in the first place and getting that education.

Participants in this group share the belief that migrant workers are more vulnerable than other workers in hospitality and events. This is because of the large number of migrants recruited in the sector, but also because migrant workers are reliant on recruitment agencies to handle the recruitment, work permits, and visa procedures. This view is connected to broader debates about the vulnerability of migrant workers to exploitation (UNODC, 2015). Additionally, many migrant workers encounter language barriers making it difficult to navigate recruitment processes themselves and to communicate employment conditions:

Patrick: Migrant workers, obviously are under an increased risk, particularly when we talk about the back-room services so the housekeeping, the cleaning, the ones who don't need the language; and as soon as a worker doesn't have fluency, for us it's a massive vulnerability of labour exploitation.

Consistent with the *Compliance Narrative*, pressure to lower labour costs is common in events and hospitality. Mark, Leah, Richard, Sarah, and Simon speak about the challenges it posed for labour providers undercut by agencies not paying their staff the national living wage or minimum wage:

Leah, Programme Director - MS Consultancy: We hear from ethical labour providers that they're constantly being forced to... or being asked to reduce their costs, and they go, 'But this is why we can't. We pay our staff this much [...] if you ask us to reduce our wages or our rates, people are not going to get paid the minimum wage, so we won't do that'. And they go, 'well that organisation will, so we're going with them'.

Mark: if we're working with a client who has been a little bit unethical where all they're interested in is getting people through the door, we really struggle there, because they ask us to lower our standards and costs to meet that demand.

Claire speaks about the increased risk of exploitation caused by digital recruitment platforms, combined with limited contact between the agency and their workers. To overcome this risk, she advises businesses to add another layer to their recruitment process that focuses specifically on risks of exploitation. Her view is that preventive tools could be 'seamlessly embedded' in the online forms and IT platforms used to capture new starters' personal data. She explains how this would require monitoring from HR departments and would need to cover five main areas: *'to establish if workers have access to their identity papers or passport, if they*

could access their bank account and wages when they want, whether they are able to contact their family and friends whenever they want to, whether anyone has made threats to them or forced them to take the job, and if anyone would try to stop them if they wanted to leave the job, or where they lived'.

Richard, Leah, Sarah, Patrick, and Claire suggest mapping the workforce to understand the implications of outsourcing labour and expose threats, as a technique to mitigate the risks of labour exploitation, including pressure to reduce labour costs. Patrick, Jane, Richard, Simon, and Leah discuss the significance of adaptability in prioritising and implementing policies and processes to increase the rate of success of prevention strategies. However, policies alone are insufficient:

Richard, Chief Executive - MS Consultancy: Companies are generally good at building policies and procedures. The problem is that too many [companies] stop once they have the policy. To see an actual improvement, they have to train out within their organisation. And they have to then embed management systems, through procurement behaviours, through engagement with labour suppliers with engagement with onsite contractors, with regard to training of supervisors and team leaders; with regard to raising awareness of all their workers, by giving access to remedy routes, and whistle-blowing routes, and reporting routes; by having in place, appropriate response mechanisms to know what to do.

Simon: Everyone's got the policy, because it's the easiest thing; you can buy it from an external lawyer, you can just put it on your websites.

Simon's observation is consistent with practices described in the *Compliance Narrative* where businesses use third parties like insurance companies for MS reporting via outsourced templates. After developing policies and processes, the industry struggles with measuring strategies' effectiveness and building capacity. To address this, participants advise measuring the effectiveness of the policies and processes with tangible and numerical targets that reflect how the organisations manage their key performance indicators. Claire and Simon explain that this final step is omitted by most companies. The MS Consultants in this group (Leah, Richard, and Patrick) confirm this as the area their clients needed most help with. This finding is consistent with the *Risk and People focused Narratives* which uncovered limitations in measuring the effectiveness of strategies, policies, and processes.

Measuring the effectiveness of preventive approaches is also a challenge. Upon terminating engagement with clients, participants are unaware if the preventive strategies lead to uncovering cases of exploitation and they lack the metrics needed to assess their campaigns' effectiveness. Claire speaks about liaising with Unseen who monitors the Modern Slavery Helpline to measure the effectiveness of their campaigns by checking the number of calls made in the areas their campaigns targeted. In the aftermath of their campaigns the numbers of calls made to the Modern Slavery Helpline increased threefold although this gave them limited assessment of the campaigns' effectiveness.

This section has presented participants' interpretation of MS as a human rights issue. Participants believe the human rights of people working in events and hospitality (particularly of migrant workers) are vulnerable to abuse, mainly due to practices associated with labour exploitation. Framing MS as a human rights issue raises concerns for both a moral and legal

violation, giving it more urgency as something that must be prevented and remedied and legally accounted for. The legal dimension of human rights would call for laws, enforcement of regulations, and litigation. Key to this narrative is the belief that collaborating with the industry is the solution to protect the rights of people working in events and hospitality. In doing so, participants adapt their discourse to 'speak the same language as businesses' and translate MS terminology with 'industry issues' which allows them to collaborate with industry stakeholders. This strategy received extensive criticism from MS scholars for continuing to perpetuate uncertainty over the implications of MS. The implications of subcontracting labour are discussed, and solutions are identified to mitigate labour exploitation risks. The next section identifies and discusses industry concerns and responses from the industry and external actors.

7.3 Industry Concerns and Rationale for Action

After defining MS as a human rights issue, this section introduces participants' concerns for the industry and challenges they experience when working with the industry. Participants in this group believe the industry has a 'compliance mindset'. They note that business leaders in hospitality and events perceive MS as either a moral or legal issue, and that many respond because of the threat of reputational damage rather than a desire to ensure they are 'fair employers'. Moreover, the level of awareness in hospitality and events is believed to be low compared to other sectors. From participants' reflections on the industry's rationale for action three key sub-themes emerged: *need for visibility*, *reputational damage*, and *accountability*. This depiction of the industry resonates to some extent with the *compliance narrative*. Partnership is proposed as a solution to some of these concerns, reinforcing the collaboration narrative.

7.3.1 Need for visibility

Consistent with research findings the response to MS is closely linked to the level of awareness. Participants believe the level of awareness in events and hospitality to be comparatively low, for which they offer two possible reasons: the hidden nature of exploitation resulting in lack of evidence, and the industry's unwillingness to acknowledge the implications of MS. To address the level of awareness in the industry participants advocate a need for visibility which they believed could be achieved through collaboration:

Jane: I think there is a low awareness. My sense is that people think that is something that happens in other countries and other sectors.

Richard: We don't have good information on it. We hear sort of anecdotally or generally about the risks within labour supply chains. But we don't have evidence which is in the sector and very, very relevant to them to say 'yes this is our problem as well'.

Sarah: I think they [businesses] would think 'oh, no this doesn't happen here'. But I think the reason that they're saying that, and the reason that we don't have evidence, is that people aren't really looking for it because labour supply chains are very complex, and I don't think people are really taking the steps to dig very deeply and to understand.

Sarah, Jane, and Richard's accounts are consistent with industry stakeholders' perception of MS showcased in the *Compliance Narrative*. According to them the hidden nature of exploitation is further complicated by the lack of transparency in disclosing cases of exploitation. Their view is supported by literature stating that the hidden nature of the crime (Moser, 2012; Bales, 2007) and its 'lack of observability' (Crane, 2013: 54) contribute to a lack of awareness and knowledge about how MS is linked to businesses. Sarah, Patrick, Simon, Leah, Claire, Mark, and Richard hold a firm belief that the industry lacks awareness because they are ignoring the evidence of MS and are unwilling to become aware:

Sarah: Hotels are not putting their heads above the parapet because people don't want to flag up that something's happening.

Leah: In 2014, there were a lot of conversations where the response from the industry was 'oh that's not something that happens here. It's not something that happens in our industry'. So, in 2014 maybe it would have been an accurate assessment to say they don't really know that this affects them. I don't believe that they still don't know. We have infiltrated so many networks and meetings and we work with UK Hospitality, which has like tens of thousands of members. We work with ...in many different ways... with the industry, and we're not the only ones, obviously, there are others that do too, so I just can't believe that they still don't know; but I think the actual issue is an unwillingness to accept that Modern Slavery can affect their business.

The industry's unwillingness to acknowledge the implications of MS is discussed in relation to implementing internal prevention practices but also in their external communication (including MS reporting and partnership engagement). MS Consultants Patrick, Simon and Leah explain that some of their clients in the private sector (Events, Hospitality and Retail) are more comfortable with reporting they donate to charities that fight MS than they are about publishing information about their own strategies to prevent, risk map, and mitigate risks associated with MS. This behaviour is described as detrimental to the industry (Monciardini, 2020) as it does not lead to corporate change, nor does it raise standards for the industry.

Simon: Companies are very unwilling to accept that [MS can impact their business], to the point where their company Modern Slavery statements are incredibly vague; they will say 'Well, we know that that hasn't happened in our premises or in our operations because we haven't seen it' and that has to change. That attitude really needs to be flipped round. And I think that collaboration and peer to peer sharing of best practice is really the only way to do that.

Simon's view on partnership is shared by Mark, the industry stakeholder in this group, but not by other industry stakeholders who are reluctant to collaborate especially with peers (competitors) as seen in the *Compliance Narrative*. Mark expresses disappointment and frustration recounting his attempts to engage peers:

Mark: At the moment, as far as events are concerned there's just not that knowledge there. And there's just a bit of a lack of interest to engage with it as well, which is quite sad. [...] 'You can't think that this doesn't happen to you, because of the scale that you operate on, you clearly have exploitation in your supply chain. So why aren't you engaging the same way that we are?' So that's quite upsetting. But I think it just comes down to individual organisations willingness to sort of engage on any kind of platform.

Unwillingness to acknowledge MS is studied in the context of developing public-private partnerships focused on labour management and unionising in the UK. The studies argue that reluctance to engage in collaborations is largely linked to lacking a common goal (Shier and Handy, 2015; Badigannavar and Kelly, 2010). To address the lack of awareness and determine businesses to improve their preventive practices and engage in partnerships, several participants speak of the importance of using actual examples of cases of exploitation. They speak about their interaction with industry stakeholders in meetings where videos and case studies are presented:

Leah: Chilling videos showing sexual exploitation - like a scenario of kids being brought into hotel and, you know - how staff will move aside while a guy goes up with a child and ... are actually really, really disturbing videos; but, um, I was in a room full of hotel managers who saw it, and they were all a bit shocked, you know, about it and then they also saw what was going on video about cleaning up the room, clearly a lot of abuse had taken place, and just all the signs, you know... the room was absolutely trashed all the rubbish and all the indicators, and lots of bad practices had been taken place there. And actually, afterwards, a lot of them in the room said 'okay we've all seen rooms like this, but we didn't do anything about it. But we didn't realise' and so it's kind of interesting. I think these kinds of videos can be really helpful to sort of galvanise people.

Mark explains their experiences of uncovering cases of 'historic' exploitation:

Mark: So, what we found was we had an increase in people disclosing stuff that was... disclosing that their previous employment had been exploitative. Particularly we found a lot of males migrant workers who would be trafficked into working in buffet style restaurants. They were having their IDs and bank cards taken from them and they were living in, like in a flat above the restaurant, and they were being given accommodation and food. They thought it was an okay deal. They were actually working 60 hours a week for about 50 quid.

Mark went on to explain the impact this has in motivating their organisation to engage in prevention, to offer all staff access to information in multiple languages, and to act against all forms of exploitation:

Mark: So, I think we've tried to overcome that hurdle by putting out these posters to show them, you know, that if you're earning minimum wage in the UK you could be earning quite good money, you know, sort of 350 pounds a week, if you're going to do a 40 hour week. And then you shouldn't be paying anyone to help with translation or bank accounts or anything like that.

As the significance of using evidence of exploitation is discussed, a level of inconsistency in the accounts of Leah and Sarah is observed. Although earlier in the conversation both talked about labour exploitation being a more prevalent practice in events and hospitality, they both use sexual exploitation case studies as evidence to raise awareness and motivate industry stakeholders to take action. Using evidence of sexual exploitation and child sexual exploitation (CSE) in a business context where labour exploitation is more prevalent contributes to the misconception that sexual exploitation is the main threat associated with MS in the industry (Paraskevas and Brookes, 2018b; Robinson, 2013). Patrick, Jane, Simon, Richard and Claire

reflect with frustration on facing this misconception, when engaging with industry stakeholders:

Patrick: In the first meeting everyone is just talking about sexual exploitation, 'what are we going to do about sexual exploitation?' and it's like guys: '[sexual exploitation] it's important, but it's labour exploitation - you're working in this sector where it's labour'. And we still, time and time again, face these two big assumptions that we have to fight, whenever we meet any business: this is not about human smuggling, it's not about people being kidnapped and taken across borders and forced in a brothel; and it is not JUST about sexual exploitation, it is first and foremost about labour exploitation.

Claire explains businesses' reactions to different exploitation types:

Claire: We did some work initially with hotels. They were very onboard with raising awareness on child sexual exploitation coming into their hotels, but they still weren't prepared to acknowledge the fact that some of their staff might be experiencing [labour] exploitation.

The false assumption that sexual exploitation is more prevalent in the industry also emerges in the analysis of MSS where a large part of the industry focuses their efforts on sexual and CSE while disregarding the risk of labour exploitation and how labour practices in the industry could contribute to it. Claire mentions the ability to identify victims due to expectations associated with the word 'victim' as a potential reason why events and hospitality businesses prioritise CSE instead of labour:

Claire: A lot of our victims are not necessarily the most sympathetic characters, if that makes sense; they are people who are also struggling a lot with alcohol or drug abuse, that kind of thing. So people don't immediately think of them as victims. If it's an elderly person with dementia, or someone with a learning disability people are all over that: 'yes, let's keep them safe'; but when it's somebody who's got a substance abuse problem, or somebody who's got suspect immigration status as well, people are not naturally sympathetic. So they don't necessarily see that there may be a problem and that can be a barrier in getting people on board; and I'm not just talking about the general population but first responders, A&E, and so forth.

While scholarship focuses on the 'voluntary' element of recruitment and the range of relationships between victims and recruiters (Phung and Crane, 2018; Ollus, 2015; Skrivankova, 2010). Findings show additional difficulties for audiences to identify exploitative practices, reinforcing the debate on the hard end and soft end of MS.

The hidden nature of MS coupled with lack of data are significant constraints participants encounter in building a strong case about MS in events. Consequently, labour exploitation is still a myth as there is no evidence, only anecdotes that this happens and might be connected to companies' labour practices. Additionally, media coverage of MS continues to perpetuate one of the most common stereotypes of women and children exploited in the sex industry (Smit, 2011; Amantia et al., 2020).

7.3.2 Reputational damage

To explore participants' perspectives of the implications of MS for events and hospitality, I asked them to reflect on the stances companies take to implementing MS requirements. They describe a reactive stance often prompted by a recurring fear of reputational damage. Participants explain that corporate image is particularly important for senior management. Their view is supported by the *Compliance Narrative* showing that businesses seek to adhere to industry standards to maintain a favourable image of the company within the industry.

Richard: I think that probably speaks to a broader fear about Modern Slavery and about talking about sex exploitation and the impact that that will have on business reputation. And it's this weird kind of paradox that we're caught in whereby we know that exploitation is happening, if only anecdotally, because the data might not be there.

Patrick: They know the power is in the reputational damage; and that's both reputational damage in terms of people not buying their products and visiting them, but also investors and shareholders.

When collaborating with the industry stakeholders, particularly with top management, MS Consultants need to adapt language and terminology, which often translates in talking about corporate image or reputational damage:

Simon: And we say to them [top management] 'look, these companies aren't inherently bad companies, something came out that showed that they were connected to modern slavery - often not doing the stuff themselves but their suppliers or their subcontractors - and they were punished. You don't want this to happen to your own company.' [...] So, they all know, it's about reputational damage.

In relation to corporate image, Simon and Leah speak about the 'pivotal role' of the media and how this contributes to building awareness about risks of exploitation connected to other industries in the UK. For example, in the summer of 2020, following reports in the media of widespread labour exploitation in Leicester's garment factories where fast-fashion brand Boohoo manufactured products, Boohoo's share prices and sales fell. Studies examining the implications of MS risks in supply chains find that many companies prioritised identifying and managing corporate social risks in supply chains to avoid risks of reputational damage incurred by companies after being exposed in the media for dismal labour standards in its offshore supply chain (Croom et al., 2018; Cunha et al., 2019).

At the same time, fear of reputational damage is also thought to be a deterrent to adopting innovative approaches to preventing MS among businesses in hospitality and events. Simon, Patrick, and Leah encounter a fear of media scrutiny when discussing reporting and implementing innovative approaches to prevention with their clients in hospitality and events. Patrick explains companies want to stay in the 'comfortable middle' to avoid attracting negative attention to themselves. Participants in this group believe that the industry of events and hospitality has a compliance approach to MS and they advocate a need for accountability to change this.

7.3.3 Accountability

This narrative emphasises the role of accountability and states that where 'morality is failing' legislation could mandate and drive change. This is framed by several participants as 'the

carrot and the stick'. Sarah, Richard, Simon, and Leah feel that the Modern Slavery Act (MSA) is seen as a 'box ticking exercise' and is not enough to compel companies to change their corporate practises in the industry. Section 54 of the MSA receives criticism from most participants in this group for lacking strength. They say that businesses in events and hospitality are acting out of 'legal compliance' by doing the minimum necessary to comply with the law:

Patrick: I think the Modern Slavery Act has shown that a small number of companies have pushed out to the front, and they're the leaders and they're doing some really good stuff, interesting stuff, but the vast majority, the bulk is just sat doing a statement, not really doing much; maybe they've made a few tweaks but they're not really changing.

Richard: The big and obvious drawback with this [MSA] is that there is ... there is no sanction for those who don't comply. [...] The difficult bit is that some companies don't take it seriously. It's just a tick-box exercise. And, as we know, lots of companies, around about 50% of the UK simply don't comply with the law at all.

The viewpoint shared by this group is that the MSA is insufficiently robust, a common concern for the advocacy field. They believe changes should be brought to the legislation in order to mandate reporting, to ensure companies are delivering the range of actions stated in their statements, and to hold those who fail to do so accountable. Participants recognise that without repercussions some businesses fail to respond:

Simon: There needs to be a way to assign accountability to all of them [companies], so that they actually have an interest in mitigating exploitation from happening in the first place. Because, I think, until there are actual consequences for companies who basically enable exploitation to happen through the way that they operate, until there are consequences for that, I don't think we're going to get behaviour change.

Patrick: Mandatory human rights due diligence should be a priority. And that could either be enforced by taking section 54 into the companies act [...], or it could be the current push for mandatory human rights due diligence in the EU. [...] More needs to be included in the Modern Slavery Act [to] provide increased penalties for individuals who have committed an offence and businesses who may be implicated in the exploitation of workers.

Participants suggest embedding processes to mitigate MS from occurring, rather than making a commitment to prevent it from occurring. Proposed changes to the MSA included: lowering the threshold (£36 million at the time of the interview), implementing penalties (for failing to report and for failing to deliver the range of actions stated in their statements), and increasing the guidance on what actually needs to be included in the statement.

Claire: So, if you have a turnover of more than GBP 500,000 you should have to have a Modern Slavery Statement and if you fail to do what you report you are doing there should be a penalty for that. Because, to be honest, from my interaction with businesses that is quite often the only real way to get through. You can do all the heart and mind kind of stuff but it's with the finances where you get people to pay attention [...] So, like, it would only take one to get a big penalty, and then they would start looking at it more seriously, but until that comes, I don't think it's good enough.

Accountability is also discussed in the context of outsourcing labour in the hospitality and events sectors. Participants stress the importance of holding labour providers *and* companies who outsource labour accountable, so they both have an 'interest' in mitigating exploitation from happening in the first place. One possible solution suggested by Claire, the local authority officer, is determining companies to appoint a dedicated MS risk coordinator to ensure consistent implementation of processes. Although, in principle, Mark advocates for holding both labour providers and clients accountable in matters related to outsourced workers' labour rights. But, on the issue of staff responsibility Mark shares the views expressed by the other labour providers in the *Compliance Narrative*:

Mark: With all sort of human rights issues - we kind of put the onus on HR departments within clients; if you're an HR manager onsite, this should be your responsibility to make sure that your workforce are happy, well-adjusted and looked after, and that they actually enjoy coming into work; because it's those grey depressing environments where slavery flourishes because your typical victim is only ever in two places their home, where they're under the control of the traffickers or their work.

MS responsibility is also discussed at departmental level. Participants have mixed views on which industry stakeholders are best suited to drive internal changes and implement preventive mechanisms in events and hospitality. Many believe it important for companies to have a dedicated role with clear MS responsibilities:

Sarah: I think human rights has to have its own space within corporate culture. Social impact and Corporate Social Responsibility is also not the same as human rights which is its own technically specialised area. So, I think the first thing is that there does need to be a designated space, a designated point of contact for human rights issues.

Participants also advise embedding further responsibility onto existing departments and some stress the impact of nominating MS experts such as Compliance Officers or Ethical Trade Managers to embed due diligence processes in standard practice of HR, Procurement and Finance teams:

Jane: Ultimately, what they do there needs to be translated to the different functional areas. So, finance, the finance team knows what they should be looking for in this 'do we have lots of workers with the same bank account details?' you know, suspicious transactions, and so forth. What about procurement, in particular, especially when it's talking about procurement of services where there might be labour issues. I think their HR, of course, as well, who are, you know, responsible for the training and the well-being of workers.

In contrast, Mark, Claire, and Simon have encountered situations where embedding MS responsibility into existing roles works well in procurement, CSR, and HR departments:

Mark: Any company that's doing sort of the right things in terms of their workers' human rights, they've been able to slot their responsibilities around modern slavery into what they're already doing.

This section has discussed the need for visibility given the hidden nature of exploitation and lack of transparency in disclosing cases of exploitation, as a means to address the lack of awareness and to build a strong case about MS in these sectors. It has addressed reputational

damage and attributing responsibility within business which generated a debate between specifically attributing responsibility to a designated role or placing it within existing positions. According to the participants' experiences, the industry has a reactive attitude to MS prevention and partnership engagement motivated by their fear of reputational damage. This finding builds on perspectives presented in the *Compliance Narrative*. Participants believe there is an unwillingness to acknowledge the implications of MS and emphasise the need for changing the legislation to overcome minimal engagement by lowering the reporting threshold, making reporting mandatory, and holding companies accountable to what they report. While their suggestions could lead to some improvements in MS prevention and partnership development it further perpetuates the reactive attitude of the industry. The GLAA are actively working on changing this behaviour. With the development of the Hospitality Protocol, they encourage businesses to report more issues where other signatories of the protocol could offer support (GLAA, 2020). The next section details the implications of partnership development, power dynamics, and barriers experienced in partnership development and governance.

7.4 Partnership Development

Upon identifying industry concerns that hindered collaboration, this section covers three distinct areas: the significance of engaging partnerships, the power dynamics of developing those partnerships, and barriers encountered by participants in collaborating with industry stakeholders. Developing relationships with key actors in the field of events and hospitality is a priority for these participants who stress the importance of collaboration throughout their accounts. They speak about partnerships with peers and external stakeholders and have a proactive approach to developing those relationships. Partnerships are believed to be the solution to addressing MS in the industry:

Jane: I think multi-stakeholder initiatives and partnerships are fantastic, basically because we don't have the legislation and the regulation in place to control corporate behaviour, and in lieu of that we have to have open discussion.

All eight participants were engaged in either peer-to-peer (P2P) or Public Private Partnerships (PPPs) seeking to prevent MS at the time of the interview. However, they explain there are fewer examples of multi-stakeholder collaborations that included events and hospitality businesses, compared to other sectors:

Richard: I'm not sure within the events and hospitality sector, that there's a tremendous amount of leadership on the issue of partnership development.

Jane: I think that the partnership point is incredibly important and other sectors are, you know, way more ahead. In apparel, for example, it's pretty much teeming with collaborative approaches and partnerships, even the extractive industry. But, hotels, hospitality, the event sector is just very, very behind.

Mark, the internal stakeholder in this group, explains how his company actively assesses the specific MS risks and seeks suitable partners who could help mitigate those risks effectively, while also sharing good practices with peers to reduce the risks of MS in the industry:

Mark: *If you're going to do any kind of level of good you can't do on your own. [...] We sort of pride ourselves on being quite transparent. So, when we attend the networks, we interact in the same way that we would if it was a peer-to-peer group. We've also set up a couple of peer-to-peer groups for recruitment agencies who aren't involved in broader partnerships to share that with them.*

Most participants speak about the benefits of P2P partnerships (also called industry forums or networks) which are seen by many as a precursor to PPPs:

Sarah: *I think peer to peer convening is really important. People love learning from each other and there are other businesses out there. If they see somebody else doing something, they can learn how they can replicate it.*

This raises questions over the feasibility of P2P relationships given the negative views and reluctance shared in the *Compliance Narrative* and the level of unwillingness demonstrated by the industry to acknowledge the risks of MS. Contrary to the hesitance to engage in partnership presented in the *Compliance Narrative*, Mark explains that many organisations prefer P2P networks to PPPs:

Mark: *I just think it's nice that they have that set up where it's an open forum and exchange of ideas and some have got a strategic direction too. And then there is that shared goal. But no, it's not really, you know... if it's led by police then it becomes very sort of heavy on NRM [National Referral Mechanism] stuff and that kind of stuff. The forum is more sort of bouncing of ideas and how we can improve things and get both ways.*

Participants who engage in P2P networks criticise others in the industry who fail to do so and see their lack of engagement as a limitation for the industry. In discussing the impact of P2P engagement, Mark explains how the networks facilitate MS awareness and share intelligence to guard companies against unethical labour providers. He explains that the criminal justice process could take up to two years and without a Public Register for labour providers, individuals and agencies could still operate, even if the police were involved or if the GLAA has sanctioned them.

Participants suggest that P2P groups are set up in response to specific problems identified by several companies. One such example was the *Compliance Intelligence Network* set up for labour providers who recruit high numbers of workers, both in the UK and abroad, for seasonal work. The network aims to share intelligence on recruitment agencies who engage in gangmasters activity and charge recruitment fees. Another example is the *Anti-slavery Hospitality Charter* created for the hospitality industry. Both networks are attended by industry stakeholders from procurement, compliance, and HR departments.

7.4.1 Power dynamics

Power is discussed by participants in relation to partnership development and coordination in two contexts: the power stakeholders have to enact change within their own organisations and the power dynamic between stakeholders engaged in PPPs. As far as stakeholders' roles within a business are concerned, MS Consultants and NGOs criticise the fact that some of the

industry stakeholders who attend meetings lack the power to implement the initiatives discussed in their own organisations:

Richard: What's important is that whoever is actually in the room, you know, that day, when the CEO can't make it or the Vice President ... whoever it is, they still need to be empowered to make decisions for the company. I know that that's been a challenge.

Sarah: It's most frustrating, trying to collaborate and going to a round table and it's a big song and dance about them, because you've managed to get everyone in the same room, but then actually the people who are there... it's been delegated to them, because the senior management are, you know, too busy - which is entirely understandable - but they haven't been given decision making power. They come and they speak and it sounds interesting and they're in the room, but they haven't been given that decision making power which is crucial to make any progress.

A potential solution identified by participants is ensuring the stakeholders engaged in PPPs hold a senior leadership position or have been empowered by senior leadership to enact changes within the company. Participants' views contradict findings from the *Compliance Narrative* and are consistent with scholarship investigating the impact of leadership on successful partnership engagement. In terms of management and governance, leadership is identified as a key aspect influencing multi-agency work (Benstead, Hendry and Stevenson, 2017). An absence of clear leadership and a lack of support from upper management is revealed as particularly damaging for effective partnership governance (Nottingham Rights Lab, 2018a).

In the context of crime prevention, effective leadership is attained by appointing dedicated responsibilities to key actors, developing appropriate accountability systems, and having a transparent decision-making process (Moran et al. 2006). Participants reference examples of multi-agency and PPPs including *Safer Slough Partnership* (awareness campaigns generally led by the Police and managed by the Local Authority); *Responsible Car Wash Scheme*; *Oxfordshire Anti-Slavery Network*; *Thames Valley Partnership* (a partnership with law enforcement, first responders, the Home Office, local authority, local businesses); *The Willow Project* (a partnership with local authority, Thames Valley Police, first responders, NGOs engaged in victim protection). In the dynamic between different categories of stakeholders, law enforcement agencies are generally seen as the stakeholder who exerts power over the other actors due to their level of authority and their experience in crime prevention. As such, most participants believe that partnerships led by law enforcement are more effective due to the level of authority:

Claire: Something that we've done that has worked really well, was awareness campaigns generally led by the Police and managed by the Local Authority. So, having them on board tends to help, although they can't do it all themselves.

Claire goes on to explain that even when a partnership is led by Local Authorities, having Law Enforcement on board helps them in their interaction with private sector organisations:

Claire: When we've done the campaigns where the police were not necessarily involved in leading the campaign, they have been instrumental... Even things like getting shops to put a poster up, the best way of doing that involves literally taking the

poster into the shop and asking them to put it up; and that worked a lot better when the Police did it for us.

At the time of this research, law enforcement are leading the majority of existing multi-agency partnerships against MS across the UK followed by local authorities (Benstead, Hendry and Stevenson, 2017; Nottingham Rights Lab, 2018a). Local or regional partnerships are led by NGOs, some private sector organisations, Government, and the Crown Prosecution Service. However, participants from NGOs and MS Consultants caution that engaging in a relationship with law enforcement might not be optimal for some industry stakeholders. This is consistent with Mark's earlier depiction of partnerships with law enforcement being 'heavy on NRM'. In order to maintain a good relationship with the private sector, Consultants and NGOs explain that they often enter collaborations as 'shadow partners' with Law enforcement agencies, such as the GLAA. They are mindful that sharing information and criticising the industry openly might hinder their relationships with businesses:

Jane: Organisations like us, we try very hard to be as neutral as possible. We're not, you know, someone like Greenpeace for example using quite offensive tactics against companies whereas, we're perhaps more... You know we don't hide the fact that we've been critical but we're a lot more open.

Leah: We're a friend of the industry; so we didn't want to criticise the industry. But we want to say, like... 'look these top rate organisations are looking at the industry and condemning it, we can help you with that'.

These views on partnership provide alternative approaches for potential partnerships in the industry. However, elements relating to MS awareness, reluctance, and stakeholders' priorities pose significant challenges to many businesses becoming engaged in partnership. Power dynamics in partnership development and stakeholder engagement have been the subject of debate in scholarship and practice. The extent to which stakeholders can impose their will in the relationship and affect the opinions, emotions, and behaviour of the other stakeholders is central to stakeholder theory (Donaldson and Preston, 1995). In multi-agency partnerships aiming to prevent crime, power provokes complex responses about core beliefs and identities. Ambiguity over professional boundaries lead to low morale and affected stakeholders' image and identity (McDonald, and Young, 2012; Benstead, Hendry and Stevenson, 2017).

7.4.2 Barriers to partnership engagement

Participants encounter barriers in developing effective partnerships with industry stakeholders, the most common are *communication issues*, *competitiveness*, and a *lack of commitment*. Patrick, Sarah, Richard, Simon, and Leah stress the impact of 'speaking the same language' with industry stakeholders to facilitate collaborations:

Patrick: A lot of the businesses that we work with, they say they value us because we speak the language of business. My boss, he's provided that for our team and most of the time he works in collaboration with businesses. So, he knows how these structures work, he knows you have to get the buy-in from the board, he knows you've got to present it in this way and speaking that language helps him so much.

Communication issues are experienced by most participants in this group in their collaboration with industry stakeholders. Communication carries several ramifications including a lack of specific terminology, a lack of transparency in communicating priorities, and an internal lack of communication and coordination between different departments. Participants discuss the mechanisms they employ to overcome these. To facilitate communication, participants engage in the process of translation and adopt the discourse of businesses, as seen in earlier sections.

The lack of transparent communication relates to businesses that fail to disclose their reasoning for partnership engagement. Communication here refers to clarity of purpose through the establishment of clear and shared aims and objectives (Atkinson et al., 2002; Harker et al, 2004). To overcome this, Claire, Leah, Mark, and Richard recommend building transparent lines of communication and creating opportunities for discussion and information sharing. In their approach to address this, participants understand that businesses often have distinct goals for engaging in partnership, but they struggle when this is not disclosed. Whilst lacking a shared goal is not an issue identified by participants in this group, it is a major limitation discussed in the *Action Narrative* (presented in the following chapter).

Additional communication issues are observed in the communication between internal departments. Patrick, Simon, Claire, and Sarah explain that lack of communication across departments leads to lack of consistency and coordination. They explained this is particularly the case when collaborating with large companies and participants believed it to be linked to the corporate leadership:

Claire: When you're dealing with very large companies, it's around where that hierarchy sits, so they might be the ones directly employing people, but they're probably not in charge of that statement, or how that statement is enacted through the company, and this is what leads to that disconnect. In very large companies that is a major problem.

Patrick: There's no follow up on it. It turns out they can't tell you how many suppliers they've got working in certain sectors; it turns out, they've got no oversight on certain sites in certain high-risk areas. They have poor coordination between teams because it falls across different teams. So you've got the procurement team and you've got the sustainability team, and sometimes the financial team or compliance team, and who's doing what? It's just this minefield.

Simon: Watertight policies, being absolutely worthless because they're not following their practice, because they have no coordination between teams.

Communication is identified, within the literature on PPPs, as the most important facilitator. Good communication between the stakeholders engaging in partnership is considered key to its success.

A second barrier is *the level of competitiveness* exhibited by some actors. Businesses receive criticism from the participants in this group for being competitive, for not working collaboratively with industry peers, and for using their MS preventive tools as a competitive advantage with their clients:

Mark: *We need to get over that sense of competition and start working more collaboratively, especially if they're ever going to sort of do any real good, but it's sad that we're still the only recruitment agency that bothers to attend anti-slavery networks, and we look at some of our competitors and think: 'You can't think you don't have a problem. You can't think that this doesn't happen to you, because of the scale that you operate on you clearly have slaves in your supply chain. So why aren't you engaging the same way that we are'.*

Sarah: *This is about human rights, human rights is not a competitive issue, you know? You can compete on all other levels of your business but where can you share how you learn from each other in an effective and safe space and create that safe space.*

Leah: *I believe that industry partnerships that start getting traction within a specific sector and then start reaching out to external actors are a good way to start. And to achieve this there needs to be a shift in mindset and to stop being competitive when it comes to human rights issues.*

The level of competitiveness has been explored in relation to MS and studies find that companies decide against full disclosure of positive information and report less in order to mislead their competition or other stakeholders, which is also referred to as strategic ambiguity (Davenport and Leitch, 2005). Research also found that companies could also make use of such ambiguity in their MSS to avoid engaging in actions against MS or to delay them (Meehan and Pinnington, 2021).

Finally, *commitment issues* are experienced by participants in this group in developing effective partnerships with events and hospitality organisations. Leah, Richard, Sarah, Simon, and Patrick criticise companies for lacking the commitment to implement processes and for inconsistent engagement in meetings. This finding raises questions over the commitment pledged in MSSs which indicate that commitment is a central part of how events companies expressed their attitude to reducing the risks of MS. NGO representatives reflect with disappointment and frustration on the lack of commitment demonstrated by businesses in PPPs. In contrast, due to the nature of their relationship with the industry, MS Consultants believe that businesses perceive collaboration as an investment, and they are more committed to implementing changes to see a return on their investment:

Patrick: *It's weird, it's like companies are more likely to come and work with you if you charge them than if you don't. I really think like if you introduce yourself as business consultant and you speak to them in terms of risk management, due diligence and they hear those buzzwords, they're like, 'yeah come in' and actually if I was a charity and say, 'we'd love to come and help you out and it wouldn't cost you a thing', they'd be like 'nah'.*

Simon: *Some of the NGOs out there are seen almost as amateurs. The financial implication of collaborating with a company... it's almost like you've given yourself value; so, I think that some charities charging companies to help them is a potential way forward.*

This points to Transactional Partnerships (Thompson and Jesiek, 2017). Patrick and Simon experience an increased commitment from companies they worked with under such engagement. They believe this to be due to the investment in external expertise which

conforms to the business mindset. In business terms a paid service is an investment measured through rigid metrics including improved corporate image and a competitive advantage in the market.

This narrative introduces partnerships as the solution to addressing MS in the industry, however, the practical details about what an effective partnership with the industry would look like and who would be involved are not clarified. Instead, it explores the power dynamics and barriers of developing those partnerships. Barriers encountered by participants in interacting with industry stakeholders surround *communication* linked to corporate leadership and lack of transparency, *competitiveness* (or strategic ambiguity), and *commitment* linked to inconsistent engagement in partnerships.

7.5 Conclusion

The collaboration narrative defines MS as a human rights issue. This means that the human rights of people working in events and hospitality (particularly of migrant workers) are vulnerable to abuse, mainly due to practices associated with labour exploitation, appalling working conditions, and language barriers. Participants frame MS as a human rights issue giving it more weight as something that must be remedied and legally accounted for. The narrative underlines that MS is still a hidden reality in events caused by lack of evidence and unwillingness to acknowledge MS, and that current labour practices lead to it. They identify labour exploitation as the main risk due to the extent and nature of subcontracting which they believe pushes responsibility from businesses to their suppliers. Participants criticise those who prioritise other types of exploitation in the industry, yet they too use evidence of sexual exploitation cases when discussing the need for visibility and evidence of exploitation.

Participants believe they play a key role in providing their expertise while the industry is largely a helpless actor. They recognise that the industry has a compliance mindset which influences their perspective and capacity to address MS. In their view, business leaders perceive MS as either a moral or legal issue and many respond because of the threat of 'reputational damage' rather than a desire to ensure they are 'fair employers'. Participants propose several solutions to improving industry standards and partnership engagement, including changes to legislation leading to increased accountability.

Consistent with findings from the *Compliance Narrative*, the industry is described as avoiding the language of MS and human rights and reverting to HRM discourse focusing on practices relating to recruitment and employee relations to describe labour practices that intersect with MS. To facilitate collaboration, participants engage in a process of translation in an attempt to 'speak the same language as business'. This means framing MS and human rights in familiar business terms to make them more easily adopted, to facilitate communication and collaboration. While this appears to be at odds with their depiction of MS as a human rights issue encompassing an array of risks and abuses, it indicates that the priority for this group is collaboration. Translation becomes useful to participants to engage with businesses. However, this strategy is heavily critiqued by MS scholars for perpetuating uncertainty over the implications of MS (New, 2015; Ollus, 2015; Cockbain et al, 2018).

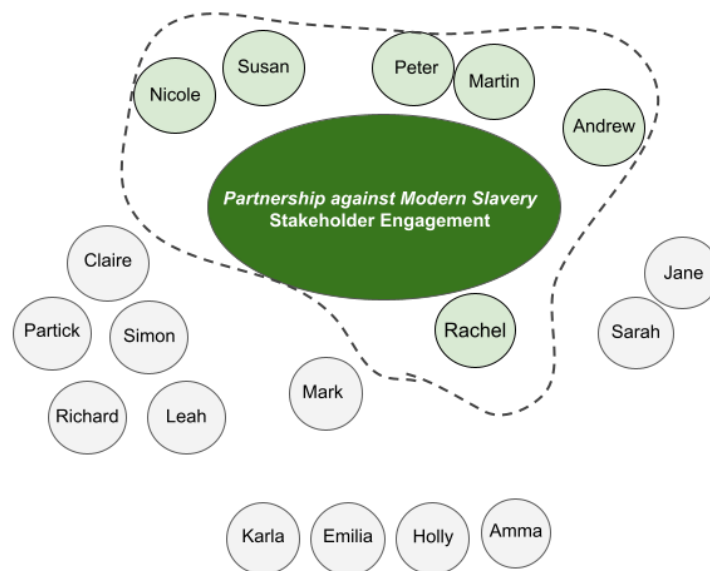
This narrative strongly suggested that partnership is the solution to addressing MS in the industry. Although the most suitable approach to partnership is unclear, examples of P2P and PPPs are discussed. Transactional Partnerships are viewed as a potential means to overcome

businesses' reluctance and lack of commitment by presenting an approach to partnership investment. There is disagreement over who should lead partnerships; some believe partnerships should be led by police due to their level of authority and the power dynamic between law enforcement and the other stakeholders. While others feel that P2P networks that start getting traction within a specific sector and reach out to external actors are a good way to start. Neither approach is consistent to the views shared in the Compliance Narrative. This poses additional challenges to PPPs that include events organisations. Participants who engaged in P2P networks criticise industry actors for their reluctance to engage and see their lack of engagement as a limitation for the industry. While others identify the competitive nature of businesses as a limitation hindering partnership and MS prevention. They explain that a 'change in mindset' is needed to address the issue of competitiveness in a human rights context.

8 Action Narrative

8.1 Introduction

This chapter introduces a narrative focused on action reconstructed from the accounts of six participants: Rachel, Andrew, Peter, Martin, Nicole, and Susan. Participants are a mix of internal and external stakeholders from a range of organisations including industry, NGO, Law Enforcement, and Central Government. The narrative captures their shared experiences and beliefs surrounding the implications of Modern Slavery (MS): what MS is, where and how it can occur, and how it can be prevented. It also includes their views on meaningful partnership engagement resulting in action. Based on their views on partnership engagement against MS, these six participants hold firm seats at the table. They are less concerned with others who are not engaged, as seen below in *Figure 8.1.*, instead they focus on the outcomes of their discussions.



Law Enforcement and Investigative Partners: Martin - Head of MS Prevention (10+ y)	Central Government Representative: Nicole - Prevention Strategy and Business Engagement (3y)
Law Enforcement and Investigative Partners: Peter - Chief Inspector (5y)	Central Government Representative: Susan - Victim and Partnership Lead (<1y); previous role: Law Enforcement - Crime Prevention Unit
Industry stakeholder - Events Venue Rachel - Procurement and Compliance Manager (6y); previous roles: graduate scheme covering employee relations, supply chain management and procurement;	NGO Representative: Andrew - Research Officer (<1y); Previous role: Operations and Communications Assistant

Figure 8.1. Group 3 - Action Narrative

This narrative emphasises that MS is a criminal issue requiring tactical action from multiple stakeholders. The six participants above are aware of specific risks associated with business and some risks associated with events and hospitality; throughout their accounts, they largely focus on sexual exploitation and child sexual exploitation (CSE). Unlike the other two groups who work closely with or within the industry, the six participants above are less familiar with the events sector; four of the participants (Martin, Peter, Andrew, and Rachel) have significant knowledge of hospitality from their engagement with hotels over the years, as such

participants often refrain from reflecting on the industry responses to MS and focus on their own. Participants speak of meaningful partnership engagement resulting in coordinated actions against MS. Their views are oriented towards partnership leadership and dominated by a shared reservation of business' capacity and interest in engaging in partnership due to differences in priorities.

This narrative focused on action offers a distinct interpretation of MS, and how the threats arising can be mitigated. The views shared by participants during the interviews pertain to their professional experiences, engagement with the industry, and their own values. They speak from a tactical position and their actions are carefully planned to achieve strategic ends. Participants' views are reflective of their position, connecting their views to a broader interpretation of MS in business linked to public policy debate.

This chapter is structured as follows: *defining modern slavery* illustrates that MS is perceived as a criminal issue, which, participants believe, is closely linked to prosecution, victim protection, and partnership development. It also emphasises the significance of language and terminology used to discuss MS, particularly when emphasising the actions warranted to prevent MS. *Rationale for action* underlines the role of responsibility in driving the industry to address the risks associated with MS and explores the role of leadership in achieving this. Finally, *meaningful partnership engagement* stresses the action-oriented quality of partnership engagement, how partnerships can change depending on their membership, and the barriers participants encounter in developing successful engagement with industry stakeholders.

8.2 Defining Modern Slavery as a Criminal Issue

The action narrative emphasises that MS is a criminal issue. The narrative emerges from participants' understanding of MS and is underpinned by the language and terminology they use. All six participants in this group convey their feelings and beliefs about MS through emotionally charged language and tones. They used adjectives such as a 'heinous', 'shocking', 'horrific', and describe MS as a 'crime against humanity':

Nicole, Prevention and Business Engagement - Central Government: *Modern slavery, it's a very complex crime, it is continually evolving.*

Peter, Chief Inspector - Law enforcement: *If we consider modern slavery and human trafficking as a crime against humanity...*

MS is framed as a criminal activity needing tactical action. When discussing the implications of MS, participants predominantly use verbs like 'tackling', 'stopping', and 'fighting' the crime, denoting the actions warranted by stakeholders fighting MS. In addition to speaking emphatically about fighting the crimes of MS and HT, Andrew expresses feelings of shame:

Andrew, Research Officer - NGO: *When I think about human trafficking and modern slavery, I personally believe that we should all be ashamed that in our current time there are 14 million lives across the world today suffering exploitation.*

While the *Collaboration Narrative* relays a consensus on labour exploitation posing the highest risk for the industry, this narrative conveys some disagreement regarding the risks associated with MS in the industry: some prioritise labour exploitation and discuss the implications of the

'gig economy', while most believe sexual exploitation and child sexual exploitation (CSE) to be the primary risks in the industry (especially concerning events venues and hotels).

Rachel, Susan, and Nicole (the industry stakeholder and central government representatives) speak primarily of labour exploitation and labour abuse as major threats associated with subcontracting labour in events and hospitality:

Susan, Victim Protection and Partnership Development, Central Government: Hospitality has been under the spotlight more and more recently and organisations like GLAA [Gangmasters and Labour Abuse Authority] have been working with partners in the industry because of the severe risks of labour exploitation. Less is known about the actual impact of modern slavery on events. But with every industry that has a high influx of temporary zero-hour sort of contracts it is undeniable that they are exposed to high risks of labour exploitation.

Nicole: In events, hospitality, you know, we know catering and cleaning, and logistics, are all risk areas; and they [businesses in these sectors] would know that any business that has a lot of people on zero-hour contracts, or gig economy, or temporary workers, that's also a big red flag.

Nicole's depiction of the industry suggests that businesses are aware of the labour risks associated with subcontracting workers given the nature of the industry. However, as seen in previous chapters, industry stakeholders largely perceive the factors described here as 'a risk of creating the conditions in which MS can flourish' as offering 'flexibility'. The industry focuses on the benefits associated with flexibility and lacks the capacity to link industry characteristics with risks of labour exploitation. Meanwhile, Martin, Peter, and Andrew (whose backgrounds are in law enforcement and NGO) present a broader picture of MS risks associated with the industry: initially, they acknowledge the implications of labour exploitation but later they underline and focus on the risks of sexual exploitation, sex trafficking, and CSE particularly in the context of hospitality:

Martin: Two aspects in the... in the... in hospitality sector, particularly with hotels because: it may be that a hotel company uses a supplier that is exploiting workers, but it's also in the hotel industry the hotels themselves can then use exploitation of people such as you know, sexual abuse of people and sex trafficking rings.

Andrew, the NGO representative in this group, reflects on victim blaming as a potential reason for prioritising sexual exploitation and overlooking labour risks in the industry:

Andrew, Research Officer - NGO: CSE is obviously just such a shocking crime [...] that people are like, absolutely terrified about being associated with that; when it comes to actually adult exploitation we know in this sector, it's just as bad, but of course they kind of see it a little bit more like: 'Maybe they got themselves into that issue. Maybe there was a bit of a choice to do that.'

Emerging studies on MS in business criticise the focus on sexual exploitation and draw attention to the issue of forced labour as the most prevalent type of exploitation in the UK (Phung and Crane, 2018; Bales, et al. 2015). The false belief that sexual exploitation is more prevalent in the industry also emerges from the analysis of MSS which show that a large part of the industry still focused their efforts on sexual and CSE while largely omitting the risk of

labour exploitation and how labour practices in the industry could contribute to it. Andrew's reflection on victim blaming as a potential reason that events and hospitality businesses still prioritise CSE instead of labour is consistent with academic literature examining the 'voluntary' element of recruitment and the range of relationships between victims and recruiters (Phung and Crane, 2018; Ollus, 2015; Skrivankova, 2010).

Consistent with public policy debates and interpretation of the implications of MS for business and society, this narrative defines MS as a criminal issue requiring tactical action from multiple stakeholders. All six participants are actively involved in addressing the risks of MS. The next section details the actions participants take and highlights how, in their view, prevention is closely linked to prosecution, victim protection, and partnership development.

8.3 Rationale for Action and Corporate Leadership

After defining MS as a criminal issue, this section presents the six participants' views on acting against MS by developing tactical approaches and framing their actions in the context of the Modern Slavery Act (MSA). Participants speak from a tactical position, meaning that their actions are carefully planned to achieve strategic ends. This section begins by looking at *prevention* and how it is linked to *criminal prosecution*, *victim protection* and *partnership development*. It then explores the significance of *technology* as a tool used for prevention and a threat associated with online exploitation and trafficking. Finally, it explores the *impact the MSA* has on the industry and addresses leadership and power as well as the significance of attributing responsibility to stakeholders in hospitality and events.

8.3.1 The four Ps

The action narrative links prevention to victim protection, criminal prosecution, and partnership development, consistent with scholarship on MS in business (Bales, et al. 2015; Crane et al, 2018; Matheson and Finkel, 2013). A sense of passion emerges from participants' shared confidence and determination in responding to the criminal issues of MS. Key to this narrative is the belief that preventive approaches required 'implementing mechanisms that stop exploitation from taking place' and for most participants this starts with increasing the level of awareness:

Peter: The first thing is acting as early as possible. Through awareness and through education, to talk about the risks of exploitation, to let everyone know about human trafficking, about difference between labour exploitation and trafficking for labour exploitation, between prostitution and pimping and trafficking, for sexual exploitation.

Martin: Our priority is to try and raise awareness within the sector, to discuss best-practices and training, and to look at the best ways to try and build out the opportunities for tackling modern slavery within the sector.

Consistent with the literature, preventive efforts described by participants seek to increase knowledge of the crimes through public awareness campaigns that educate communities and inform businesses (Crane et al. 2021) about the threat of MS, to enable victim identification and to warn vulnerable populations (Bales, 2007; Brunovskis and Surtees, 2019). Martin further emphasises the implications of raising awareness with all levels of staff within the

hospitality sector, and how an increased awareness could result in improved reporting and better prevention strategies:

Martin, Head of MS Prevention - Law Enforcement: *I think raising awareness within companies is really important [...] from housemaids to the directors on the board. Raising awareness and heightening people's awareness of the issues is really important at board level... for taking seriously the UK requirements for the transparency in supply chain statements.*

Rachel, Martin, and Peter, the two participants from law enforcement and the industry stakeholder, feel that the level of awareness in hospitality has improved in recent years:

Martin: *I think [the level of awareness] it's probably quite reasonable in the hotel industry, perhaps less so in the ... in the events sector.*

Peter: *I think they're quite open now about the challenges that they face. Maybe a year or two ago they were trying to cover things a little, and then maybe keep things in house. I think there's a... there is an open acceptance now that it's a problem across the industry. By working together, they can drive up the standards. So there seems to be a willingness and eagerness to report issues and to share the learning that exists from dealing with those issues.*

The action narrative portrays an optimistic view of 'progress in the industry' in strong contrast to the views and experience of participants presented in the previous chapters. Industry stakeholders, in particular, conceive MS as a distant issue likely to occur in 'other countries and other business models'. However, understanding the extent to which this optimistic view is representative of the industry proves difficult. While there are some good examples of companies going 'beyond compliance' in their effort to prevent MS and develop partnerships, the experiences of external stakeholders with reluctant businesses, the small level of engagement in partnership, and the level of MS reporting leads to questioning this optimistic belief. Instead, these views may be the result of a lengthy engagement with certain businesses in the sector.

Given their limited engagement with events and hospitality, Nicole and Susan, (Central Government Representatives) refrain from commenting on the level of awareness in the industry or what might determine the industry to engage in prevention. Instead, Nicole and Susan speak about the need for visibility, discussed at length in the *Collaboration Narrative*, and stress the importance of having the evidence of exploitation to determine businesses to act:

Susan, Victim Protection and Partnership Development, Central Government: *I think everyone sits up if there are real examples as opposed to the abstract 'modern slavery is bad, it's worse than we think, you know, it might be around the corner from you' [...] people kind of respond to that, but I think they get a bit of fatigue. But when they say 'there was something that happened, actually in the next-door town, and this company was prosecuted, these people were rescued' or whatever that... that definitely sort of makes people, I think, it makes people sit up a bit more.*

This leads to questioning the motivation and priorities of businesses responding to the consequences faced by other organisations, as opposed to the implications on MS in general.

Nicole also questions the motivation of some businesses to engage in prevention and partnership. She believes that some businesses want to become aware of MS and to engage in collaborations while others are only interested in being seen to engage in dialogue about its prevention:

Nicole, Prevention and Business Engagement - Central Government: *I think a business has to want to know. I mean it depends who's leading the business and whether they want to know or not. Or whether they just want it to look like they've done something.*

Consistent with the views presented in the *Collaboration Narrative*, Peter and Nicole link willingness to acknowledge MS to corporate leadership. Raising awareness within the industry of the extent and specific risks associated with MS is agreed to be at the forefront of preventive efforts (Bales, 2007) not only in academic literature but also by most participants in this study.

As the conversation on prevention unfolds, Andrew, Martin, and Susan include victim protection, prosecuting criminals, and partnerships in discussing prevention. The three advocate the importance of nurturing preventive actions that deliver positive long-term outcomes for victims of MS and vulnerable populations. This is illustrated in Andrew and Susan's answers which emphasised the impact of prosecution and victim protection, when asked to talk about their experience in MS prevention:

Interviewer: Based on your experience, which prevention strategies do you believe to be most important and why?

Andrew: [...] *We need to get further convictions, and I think that we need to have a call for action, we need to be looking at supporting the civil society and the organisations on the ground who are supporting the victims.*

Susan: *I focus on victim support, identification of victims and long-term outcomes. I am looking at improving the quality of victim support, and I guess where... where the partnerships aspect comes in, for me, is around that sort of multi-agency approach to victim support [...] to prevent survivors from falling victims to being trafficked.*

Susan emphasises the collaborative multi-agency approach to prevention by engaging with businesses and NGOs. Martin and Andrew also stress the importance of collaborating with external agents to increase the rate of success of preventive strategies:

Martin: *I think we need to bring together partners to look at the topic of prevention. So prevention should be the topic and the priorities should be based on evidence, based on intelligence, and would probably change quite regularly.*

Andrew: *Without properly considering and fostering partnerships with stakeholders from multiple sectors, it's very unlikely that the other preventative or prosecuting efforts will ... will succeed.*

Martin, Andrew, and Susan's view is that without creating partnerships to share experiences and develop an understanding about specific preventive approaches, any attempts to develop effective preventive measures are likely to fail. Research advances on prevention has also underlined the need for developing partnerships. Dean and Marshall (2020) find that combating MS requires the expertise, resources, and efforts of many individuals and entities.

The complex, multi-faceted risks arising from MS required a comprehensive response from key actors in areas connected to human rights, labour and employment, health care, and law enforcement (Matheson and Finke, 2013).

8.3.2 *The significance of technology*

Participants emphasise the role of technology in providing an environment in which exploitation can thrive, but also, in preventing exploitation and aiding prosecution of those engaged in it. Technology is referenced by Peter, Nicole, and Andrew, who describe it as a 'double edged sword' and viewed it as both a potential tool and a threat. Participants initially discuss technology as a means of facilitating sexual exploitation, sex trafficking, and CSE, as well as facilitating illegal online forms of recruitment that lead to exploitation:

Andrew: There are also instances where the actual exploitation is through technology. The worst of that, of course, is when children are ordered online, and will commit sex acts, some distance away at the request of somebody on the other side of the world who will be then paying for that, through technology as well. And some of those instances take part in hotels, where exploiters can use the anonymity and ease of location change offered by hotels.

While reliance on tech is associated with recruitment and subcontracting labour in the *Compliance Narrative*, Andrew's comment is reflective of wider views exploring the use of technology in exploitative practises linked to sexual and CSE. Sexual exploitation of adults and particularly children are receiving increased interest both in literature and in practice (Milivojevic et al, 2020; Christ and Helliard, 2021). Peter, Andrew, and Nicole stress the role technology could play in facilitating crime prevention and securing prosecutions of those engaged in it. They speak about using technology in disseminating quick intelligence, in raising awareness, and as an investigative tool in prosecuting criminals:

Peter: What we need to see is how the internet facilitates this organised crime and how technology companies can interfere and regulate, how much they are doing themselves, and how much they are required to do. [...] But also where it [technology] can play a role in prevention, to make sure that these criminals cannot exploit people, and that they are unable to transfer funds across the world.

Nicole: For example, coaches booked with the same credit cards in group booking directly from a certain destination, very useful information that is there and can raise those red flags that would take you to intelligence and would help you identify the traffickers.

The notion that technology could offer new tools in combating crime are echoed in recent MS literature (Milivojevic et al, 2020), while NGOs, anti-trafficking organisations, and governments have been increasingly using social media to warn potential victims (Berg, Farbenblum, and Kintominas, 2020). Due to a lack of extensive evidence, the discourse around labour exploitation facilitated by online platforms is secondary to that of technology used to facilitate sexual exploitation. However, as seen in the *Compliance Narrative*, technology plays an important role in facilitating recruitment, staff management, and payments although not explicitly linked to increasing the risks of labour exploitation.

8.3.3 The MSA Increasing Responsibility

Participants view the MSA as an ‘opportunity’ to increase responsibility within the private sector and promote transparency in supply chains. Peter, Andrew, and Susan state that the MSA has been ‘crucial’ in driving change for events and hospitality businesses as these were only aware of human trafficking and CSE before the legislation came into force. Their view, however, is not consistent with those expressed in the *Compliance Narrative* which portrayed limited understanding of the MSA, and lack of awareness concerning labour exploitation. Still, this narrative conveys that due to the MSA, senior leadership have a better understanding of the risks of labour exploitation:

Martin: The requirements to provide a transparency statement is a really good piece of legislation. I think it's a really positive thing. I think there are some companies that take it really seriously. And because they're taking it really seriously, it attracts the attention of the board, and it gets the buy-in at the board. And generally senior management's are aware of and supportive of the issues that need to be challenged. So that's all really positive.

Rachel, the industry participant in this group, who is actively involved in implementing preventive measures in the organisations’ operations and supply chains also speaks positively about the MSA:

Rachel: The [Modern slavery] Act provides the backbone and validates our efforts with our supply chain really giving direct action towards the section 54, moving from a ‘nice to have mentality’ to compliance, and then moving beyond towards implementation... and implementing some of these practical things, specifically the transparency and supply chain section has given us the ability to leverage the act to ensure that ethical labour standards are being upheld.

When talking about reporting, Rachel explains that the MS statement in her organisation is produced by the Central Sustainability Manager in conjunction with their Legal Team and approved by the CEO. Their MSS highlights the nuances of global and local approaches to reducing the risks of labour and sexual exploitation for their company and subcontractors. In contrast to Amma’s account in the *Compliance Narrative*, Rachel explains that the focus of reporting is not on producing the document but on taking the necessary steps to develop policies and processes, building thought leadership, and driving improvement year on year to push their practices in their organisation forward.

Participants discuss corporate leadership at length in the context of developing tactical approaches to MS. Corporate leadership plays an active role not only in MS reporting, but also in addressing the risks of MS internally. The contingency theory of leadership (Fiedler, 1964) outlines two styles of leadership focused either on tasks or relationship management, and it is the former that participants in this group advocate for. Nicole, Andrew, Rachel, and Peter described a ‘top to bottom’ approach in which senior leadership are responsible for implementing preventive strategies. They emphasise that the best examples of good-practice on MS prevention in business are those where senior leadership make MS strategies a fundamental part of how their companies operate:

Nicole: *I think that the best businesses we're seeing are really leading from the top on this, and, and they're kind of embedding the concepts around this across their organisation; the leading businesses who are actually doing it properly - not paying lip service or embedding the UN Guiding Principles and the Sustainable Development Goals - they're all, sort of, embedding those into everything they do.*

Rachel: *It's been a massive capacity building exercise, as I've said earlier this hasn't always been easy. We've had to strive to find grievances. We work really, really hard at our supply chain to come up with innovative financial tools often to tackle some of these issues in terms of industry collaboration.*

Participants' views on the role of corporate leadership in driving internal changes is consistent with how they earlier express the role of leadership in increasing awareness within businesses and their supply chains. The role of leadership in MS prevention has been looked at in scholarship and practice since the MSA was enacted in 2015. The Ethical Trade Initiative (ETI) states that senior leaders' engagement is a strong enabler of corporate action on MS (ETI, 2018) and a crucial part in driving effective reporting. This means that leadership plays a critical role in ensuring that an appropriate suite of preventive mechanisms are produced.

Nicole, Andrew, Rachel, and Peter further reflect on how businesses attribute dedicated MS responsibility. They stress that in addition to senior leadership companies need to embed MS responsibility into different departments depending on the business model and specific MS risks. They recommend creating a dedicated role such as Modern Slavery Officer, a Modern Slavery Champion, or a Modern Slavery Risk Coordinator, granting them power to oversee the implementation of prevention strategies, and facilitating their engagement in partnerships with internal and external stakeholders.

Nicole: *It is very important that somebody actually has the role of doing it... otherwise nobody's very clear about who's really in charge of this, because it could go into any area, and when it's not defined that can be problematic. There also needs to be a reasonable amount of authority to go into other departments and to really make people accountable to what they're doing.*

Nicole, Andrew, and Peter criticise placing MS responsibilities onto existing roles saying it carries a danger of being perceived as an 'optional' or 'auxiliary attribution'. This is a common debate in Business and Human Rights scholarship (O'Kelly, 2019; Smit et al, 2021). Martin, Peter, Rachel, Nicole, and Susan talk about the importance of businesses in the sector attributing responsibility not only to the board of directors responsible for signing the MSS, but also to their suppliers. In their view, businesses in events and hospitality have the ability to use their power to influence the practices in their supply chains and to prevent labour exploitation. Consistent with the *Collaboration Narrative*, participants feel that responsibility to prevent MS should be placed with companies who use outsourced labour *and* labour providers so that both parties become involved in mitigating exploitation from happening in the first place.

Martin: *Companies have an important role to play in persuading their suppliers to do the right thing. The major companies have a financial grip over their suppliers and they should be able to use that grip to influence the way that the suppliers train people and their own [suppliers'] reporting mechanisms.*

Peter: We need to make sure that the priority that we look at is human lives, and not just profits and not just what is comfortable for big international corporations. That's why I think we need to push at the moment, that there is more responsibility sitting with the corporate sector, particularly when it comes to supply chains.

Participants in this group see it as the responsibility of hospitality and events companies to add MS to the agenda and use corporate influence to guide suppliers' code of conduct leading to improved practices for the industry:

Rachel: In terms of client demands, we've seen a rise in clients asking questions around labour rights, human rights, and particularly looking at the Middle East context. We've seen quite a massive response in Qatar and the UAE with really strong clients pushing... pushing us to go further in terms of our supply chain.

The *Rationale for Action* outlines the response deemed necessary in the views and experience of participants to tackle MS. Consistent with findings from the *Collaboration Narrative* it advocates for increasing awareness in the industry and stresses the role of corporate leadership and the importance of 'willingness'. It highlighted how prevention is closely linked to victim protection and prosecution. In contrast to the *Compliance* and *Collaboration Narratives*, which suggest the MSA lacks strength, these participants view the MSA as an 'opportunity' to encourage businesses to develop an effective response to MS and to promote good-practice across their supply chains. Participants stress the importance of corporate leadership in creating and attributing MS responsibility to business and developing dedicated roles within businesses. Furthermore, it criticises businesses that place MS responsibilities onto existing roles saying it led to MS being perceived as an 'optional' or 'auxiliary attribution'. The next section details the quality of partnership engagement and barriers experienced in partnership governance.

8.4 Meaningful Partnership Engagement

This narrative emphasises that addressing MS requires coordinated tactical action from multiple stakeholders. This means developing 'meaningful partnerships' described as having a shared purpose, active and consistent contribution to discussion from all engaged, and tactical results consistent with strategies discussed in meetings. All participants are engaged in a number of multi-agency and PPPs against MS at the time of their interviews. Partnerships are viewed as an opportunity for stakeholders to share their expertise and learn from other organisations seeking to prevent MS by having action-oriented outcomes.

8.4.1 Action-oriented quality of the engagement

When discussing engagement with industry stakeholders, participants stress the importance of developing 'meaningful engagement', consistent with new debates in MS literature (Buhmann, 2020). According to participants, meaningful partnership engagement requires actionable outputs, measuring the outcomes, and a level of adaptability from all partners. Most of these participants, however, criticise industry stakeholders for their (lack of) engagement and share reservations about the extent to which partnerships that include private sector organisations could be meaningful:

Nicole: *I think partnerships are a really, really good idea but they need to keep momentum. I mean, we've all been to lots of multi-stakeholder meetings where the same thing seems to be discussed every quarter and everyone seems to have good intentions, but there doesn't seem to be much movement.*

The action-oriented quality of the engagement is referenced by most participants in this group:

Martin: *Now, it's good that people come together and have a nice chat, but does it change anything? What's the impact, and how do they measure the impact? What's the objective? What's the purpose of it? So, you know, yes, it's potentially good, but it actually has to be good.*

Martin, Rachel, Nicole, and Susan speak about the significance of performance management, in discussing meaningful engagement with industry stakeholders. They believe performance management essential to demonstrate the effectiveness of partnerships against MS and find this to be an area where businesses struggle in the context of partnership development. Their observation is consistent with findings emerging in the *Collaboration Narrative* concerning engagement with businesses. It is also a limitation in MS reporting presented in the *Risk and People Focused Narratives*. Participants' views on the significance of performance management in partnership governance is supported by literature on multi-agency partnerships. MaPs against MS are accountable to a variety of stakeholders including victims of MS, funders, the government, and the public (Osborne, 2000; Wastell, et al., 2004). Partnerships need to have performance measures in place to assess how well they perform against their goals.

If partnerships lack appropriate performance management tools to monitor and measure progress, partners are unable to assess or to improve performance (Mohr and Spekman, 1994; Liu et al., 2014). Performance management in addressing MS is defined as a strategic and operational approach to delivering successful outcomes (Nottingham Rights Lab, 2018a). It includes planning, monitoring and evaluation, making improvements, developing capabilities, and ongoing communication between partner agencies throughout the duration of a partnership. Performance management is evidenced as a problematic area for many businesses in the sector in measuring the effectiveness of policies and processes, building capacity, reporting the KPIs used in mitigating risks in MSS, and measuring the effectiveness and impact of their engagements with stakeholders.

Participants have different experiences and views on engaging with actors outside their respective organisations. When discussing engaging with private sector organisations, they express caution about establishing priorities and ensuring stakeholders have shared interests:

Martin: *We've recently created something called the UK Operational Prevention Group, which is bringing together all the different government departments including us to try and decide what the priorities should be, and to try and work towards them in a coordinated way. So, I guess what I'm saying is that it's a really complicated picture; there are different organisations with different priorities. If we all worked on the same priority, I think we could be much more effective.*

Rachel, Andrew, and Martin offer several examples of PPPs including Hospitality Protocol, Operation MakeSafe Campaign, Responsible Car Wash Scheme, and many other regional

and national initiatives listed in *Table 7.1*. Nicola, Andrew, Richard, and Susan reference Operation MakeSafe Campaign where law enforcement partnered with hotels to train front desk staff across London, including UK heads of housekeeping and UK labour agency partners to raise awareness about child trafficking. While across the UK participants mentioned over 25 regional MaPs developed and supported by the Independent Anti-Slavery Commissioner's Office (IASC) with the University of Nottingham Rights Lab leading to a publicly available online Toolkit for partnership development.

A PPP at the national level mentioned by Martin, Nicole, and Peter is the Responsible Car Wash Scheme developed by statutory enforcement agencies in partnership with GLAA, Police, Health and Safety Executive, HMRC, Environment agency, the Head of Retailer's Association, as well as Unseen, the charity responsible for the MS Helpline. The aim of the initiative is to raise awareness and enable members of the public to identify cases of labour exploitation. Another multi-agency initiative at national level dedicated to the events and hospitality industry is the hospitality protocol developed by the GLAA in partnership with NGOs and industry stakeholders. Following the success of the construction protocol, the GLAA aimed to launch the Hospitality Protocol in the early months of 2020. Due to the Covid-19 outbreak, however, the launch was postponed and at the time of this writing the protocol is yet to come into effect. Martin, Peter, Susan and Rachel are familiar with the protocol and welcome its launch as a further support group that businesses in the sector can access in coming together, sharing good practice, and improving their preventive measures.

Adaptability emerges as a key finding linked to meaningful partnership engagement from multiple accounts especially in the context of leadership. Findings from the *collaboration narrative*, as well as literature on anti-crime multi-agency partnerships, suggested that law enforcement agencies are generally seen as the stakeholder leading multi-agency and PPPs due to their capacity to exert power over all other actors (Donaldson and Preston, 1995; Benstead, Hendry and Stevenson, 2017), their level of authority and their role and experience in crime prevention. However, participants advocate for adaptable leadership in partnership governance. While this reflects participants' attempt to not impose their leadership style onto other partners, it appears inconsistent with their emphasis on the need for action and critique of lack of meaningful engagement in partnership. Participants' view on adaptable leadership is consistent with the contingency theory of leadership (Fiedler, 1964) that emphasised the significance of adaptability in styles of leadership according to the objective of the partnership. Andrew, Susan, and Martin advocate that people from different work streams, within public sectors and other agencies, who are passionate about combatting MS, including NGOs and activists, need to be able to lead on the partnership front that is particularly relevant to their area of expertise:

Susan: Typically it's the police who are leading, but I'm not sure if that's always going to be right because there are different interests at stake when businesses are involved; for example if you're trying to encourage law enforcement to develop a relationship with businesses to share intelligence, things like that... actually there are times where it can be beneficial to have other agencies leading as well.

Therefore, the relevant leadership is not necessarily the same in every partnership and it very much depends on its membership and objectives linked to prevention, protection or prosecution. Adaptability is also warranted in the geographical reach of a partnership. On a local level, Martin, Andrew and Peter, speak of the need for projects and partnerships that

facilitate sharing information across schools, communities, local businesses, and particularly with vulnerable people who may have limited access to information. The objective of local initiatives is generally to raise awareness of the threats of MS and empower stakeholders to report cases of exploitation; but also, to gather intelligence that enables law enforcement to prosecute criminals. Another important benefit of local partnerships recognised by participants is enabling partners to identify and mitigate specific risks more effectively. In addition to local efforts most external stakeholders speak about the importance of national coordination:

Peter: We do need projects that are local, and we need to facilitate access to information to be shared across... across communities, and particularly with vulnerable people who may have limited access to it, we need to understand how we can raise their awareness.

Andrew, Peter, and Rachel stress the importance of international collaborations. However, while on a local and national level participants provide examples of strategies that work well and identify stakeholders in a position to lead the initiatives, on a global level the implications of collaborations are more vague.

Andrew: The police need to work with the Home Office, with charities and local authorities in partnership to look at addressing this. And that's just... not just in the UK but actually across the globe, it's really important that we share intelligence.

As international partnerships are discussed, participants refer to MS and HT. This provided valuable insight into participants' perception of the threats of MS and cross-border implications. Adaptability in partnership leadership is supported by the Rights Lab second report (Nottingham Rights Lab, 2022), which contains recommendations for private sector organisations and provides examples of partnerships across different industries including retail, agriculture, fishing, construction, and fashion.

8.4.2 Barriers to meaningful partnership engagement

Participants discuss barriers experienced in partnership engagement and governance. Barriers emerge as participants reflect on what could be further improved in preventive efforts and partnership developments in events and hospitality. They identify barriers including communication issues and a lack of transparency, commitment and contribution issues, conflicts, or uncertainty about the interests of other stakeholders, and disagreement about which goals to prioritise particularly in partnerships that included industry stakeholders

They identify *conflicting interests* as a main barrier in developing meaningful partnerships. They criticise the attitude of some businesses towards engaging in partnerships. In their experience some private sector stakeholders engage in partnerships that aim to effect change for the industry, when in fact they are only interested in gaining access to information. This observation resonates with frustrations shared in the *Collaborative Narrative* about lack of transparency in communicating interest. It occurs that the same issue is interpreted differently by external actors: those focused on collaboration simply wish the interest to be disclosed and perceive this as a communication issue; while those focused on actionable outputs perceive this as a conflict of interest. This reflects external actors' attitudes towards engaging businesses, and the extent to which they are willing to adapt to businesses' needs.

Furthermore, Martin, Andrew, Nicole, and Susan express a level of reservation on businesses' engagement in PPPS, due to differences in interest and objectives amongst stakeholders engaged in that collaboration:

Andrew: We need to ensure that we all have our shared goals, and shared values, and mutual benefits, as well as complement each other's expertise, for an effective partnership to work. If we fail to identify the synergies, and how we can complement each other with the expertise that we all have in this, I would say we don't stand a chance in the fight against modern slavery and labour exploitation.

Susan: I think it's quite difficult, and I haven't seen many examples of effective partnership arrangements which include businesses, and I don't know of any which include events. I think there are separate forums that are, kind of, business forums; but having businesses integrated in a meaningful way with a wider range of stakeholders and engaged in partnership is quite difficult.

Andrew, Nicole and Martin reflect on the overall lack of contribution and effective engagement demonstrated by businesses and criticise businesses for reducing the impact of preventive measures and collaborations. In their experience, some businesses engage in collaborations with external stakeholders, but fail to contribute to the discussion and to later implement changes in their own organisations. They believe that this is due to lacking a shared interest:

Nicole: I'm seeing quite a few business forums with law enforcement and various other agencies and definitely some businesses; they really like to join these things, because it looks good, but they don't actually contribute much. And you'll get some other businesses that will really contribute and for them it's often about sharing intelligence.

The consensus is that a crucial aspect determining a partnership's success is a shared interest from all members. Having a shared interest translates into having clear objectives from the early stages of the collaboration, as well as understanding and strategically planning the actions and input of each individual moving forward:

Nicole: I think when we're looking at modern slavery, labour abuses, there are a lot of different government organisations that have a stake. So, our organisation deals with the Police Forces, NCA, HMRC, Home Office, Foreign Office. But on top of that, there are a myriad of different NGOs who are working in the sector as well. And whilst I think everybody is really well intentioned, it gets really confusing as to who is doing what.

According to Andrew, Susan, and Nicole the scope of partnerships needs to be closely linked to its membership to ensure a shared interest, meaning that the aim of the partnership would be influenced by the stakeholders who engage in it. However, based on their experience, not all stakeholders are transparent in what they wish to gain from entering a partnership resulting in lack of commitment and contribution from industry stakeholders down the line:

Nicole: It depends again what the purpose of the group is: is it about sharing intelligence? Is it about victim care? Is it about identifying? Is it about how people operate? is it about good practice? I mean some of these groups try and do all these things, and some businesses don't really engage with most topics. And that's, and that can be problematic actually.

Martin: I guess the interest of businesses obviously won't be in line with the objective of the other stakeholders, particularly public sector agencies...

The issue of conflicting interests in the development of partnerships leads to a discussion on motivation and questions what drives companies to engage in partnerships in the first place. In the experience of the six participants the main reason many businesses join partnerships is for training and awareness or for developing their own understanding of legislation and obligations, consistent with what industry stakeholders state in the *Compliance Narrative*. Participants explain that this issue leads to tension among stakeholders, thus compromising the impact of their collaboration. Given the difference in priorities between stakeholders, participants reflected on the impact of multi-agency and PPPs:

Susan: So as multi-agency approaches are concerned, I often wonder... Is that the right thing? Is this the right sort of approach to any sort of strategic group? I've said this before, but the multi-agency interaction needs to be meaningful.

This is also the experience of the NGO representative in this group who engage with different stakeholders in several initiatives that include businesses. In their experience, this leads to a 'one-sided' partnership where businesses engage to benefit from other stakeholders' expertise but fail to contribute or to implement the actionable points agreed in meetings. This evidence shows differences in how the role of businesses is perceived by different actors.

Andrew: In my experience public sector actors are primarily concerned about cases of exploitation and safeguarding victims... and I think with few exceptions that's not actually a priority for businesses...

Andrew's observation is consistent with findings emerging in the *Compliance Narrative* where industry stakeholders express their interest in developing relationships with the Home Office to ensure *compliance* in their own recruitment practices. The Independent Anti-Slavery Commissioner (IASC) in partnership with Nottingham University Rights Lab developed a Partnership Toolkit specifically designed to overcome issues relating to transparency and conflicting interests. Consistent with participants' views on adaptability, the toolkit explains that the function of an anti-slavery partnership would affect the structure that its members need (IASC, 2020; Nottingham Rights Lab, 2018b). For instance, if stakeholders are mainly interested in sharing information, a regular network might meet their needs. This structure of partnership described in the *Collaboration Narrative* is what peer-to-peer groups achieved by sharing information and reducing the risks of subcontracting labour from unethical labour providers. However, the *Compliance Narrative* suggested the industry might not want to engage with competitors in any capacity. Once again this leads to questioning the feasibility of collaborations that include businesses., be they PPPs or P2P.

This section has presented partnerships as an opportunity for stakeholders to share expertise, to learn from other organisations, and to deliver strategic results. Developing meaningful partnerships requires actionable outputs and performance management; however, participants fear this is not the case for many of the existing partnerships against MS that include businesses. Similarly to the engagement of business in prevention, their engagement in partnerships is determined by different factors including stakeholders' priorities and interests. Consistent with findings from the *Collaboration Narrative*, Law Enforcement are generally seen as the stakeholder in a position to lead on the partnership front due to the

power they exert over the other actors, their level of authority, and their role and experience in crime prevention. Additionally, participants emphasise that adaptability on leadership styles might be warranted depending on the objective of the partnership. This narrative reveals that there have not yet been many successful partnerships that include private sector organisations and even fewer have hospitality and events companies in their membership.

8.5 Conclusion

This narrative describes MS as a ‘heinous crime’ and emphasises the actions warranted to address it, including increasing awareness in the industry and developing adaptable strategies based on intelligence. It acknowledges the importance of ‘willingness’ to become aware and the role of corporate leadership in improving the level of awareness in the sector. It highlights that prevention is closely linked to prosecution, victim protection, and partnership development; although, some disagreement arises concerning the most prevalent types of exploitation in the industry between labour and sexual exploitation, and over the role technology plays in facilitating and fighting MS.

The narrative underlines that taking action against MS is rooted in a sense of responsibility, guided by the MSA, which participants believe should drive the industry to address the risks associated with MS. Here, the MSA is viewed as an opportunity to increase responsibility within the private sector, foster transparency in supply chains, and contribute to raising awareness in the industry. According to participants, businesses in events and hospitality have the ability to use their power to influence the practices in their supply chains and to prevent labour exploitation. Consistent with the *Collaboration Narrative*, this narrative stresses the importance of attributing responsibility to prevent MS to both companies that use outsourced labour and labour providers, so that both parties become involved in mitigating exploitation from happening in the first place, however the mechanisms of enforcing this are unclear. Moreover, it stresses the impact of leadership in creating business responsibility and developing dedicated roles within the company.

Based on their extensive engagement in multi-agency or PPPs, participants view partnerships as an opportunity for stakeholders to share their expertise and learn from other organisations seeking to prevent MS. At the core of this narrative is the belief that developing meaningful partnerships requires actionable outputs and performance management systems, an area where many businesses struggle according to participants, and evidenced in the other narratives. Although there is an optimistic view of progress in the industry, participants observe that some businesses have distinct priorities and interpretations of MS. This leads to a sense of reluctance to engage in PPPs with some industry actors. While partnerships are seen as a significant opportunity for the industry, businesses’ motivation and interest are brought into question, as is their capacity to communicate, act transparently, and change corporate practice. This is believed to be due to ‘conflicting interest’ and identified as a core barrier to meaningful partnership engagement. Still, there is ample evidence of active engagement in MS partnerships with other agencies. The membership, governance, and output of these engagements are documented, and examples are detailed, however, there are few examples of such engagement that includes businesses (PPPs), and none that include events organisations.

This concludes the thesis findings. Before I move to the *discussion*, the table below illustrates evidence that emerges from this study in relation to partnership. While there is limited evidence of partnerships seeking to prevent MS that include event organisations, research participants discuss the notion of partnership along with postulating plausible scenarios for potential engagement. Additionally, they provide examples informed by other industries including hospitality, construction, retail, apparel, and agriculture. The evidence of partnership is mapped using the approaches to partnership presented in the conceptual framework as follows: *contractual partnership* refers to partnerships with clients and suppliers mentioned in the *Compliance*, *People*, and *Risk focused Narratives*; this approach to partnership aims to set industry standards and develop long-term engagement with suppliers, where the nature of their collaboration is based on contractual links. Contractual partnerships, although novel to MS prevention, are informed by supply chain management research (Canzanelli, 2013; Ali, et al., 2019) looking at facilitating and sustaining relationships with suppliers, buyers, and competitors. *Transactional partnership* represents the partnerships with NGOs, MS consultants, and the Home Office referenced by the *Compliance*, *Collaboration*, and *People focused Narratives*. This engagement reflects the ‘investment’ made into external expertise to address the risks and issues the organisation faces, based on research in educational and civic engagement contexts (Thompson and Brent, 2017 Thompson and Jesiek, 2017). Peer-to-peer engagement refers to partnerships with peers or competitors discussed in the *Collaboration Narrative* and referenced in the *People*, *Compliance*, and *Action Narratives*. This approach to partnership is informed by examples from other industries where organisations engage with peers to improve industry standards, to access knowledge and improve the level of awareness about the specific MS risks (Lin, et al. 2022). Finally, *public private partnership* refers to multi-agency engagement that includes industry actors and is supported mainly by the *Action* and *Collaboration Narratives*. These four approaches, their membership, objectives, and leadership are presented below in *Table 8.1*

Partnership dynamics: development and opportunities for event organisations					
		Contractual Partnerships	Transactional Partnership	Peer-to-peer	Public Private Partnerships
Findings reference	Discussed in:	Risk, People, and Compliance Narratives	People, Compliance, and Collaboration Narratives	People, Compliance, Collaboration, and Action Narratives	People, Collaboration, and Action Narratives
	Referred to as:	partnerships/ relationships with clients and suppliers	partnerships/ relationships with Home Office; third-party auditors; NGOs;	industry networks; forums;	multi-agency/ multi-stakeholder/ public-private engagement;
Evidence of current partnership engagement	Member organisations	Industry Stakeholders: upstream and downstream supply chains	Industry stakeholders, NGO, Home Office; no competitors engaged;	Industry Stakeholders (clients, suppliers <i>and</i> competitors)	Home Office, GLAA, law enforcement, local authorities, central government, MS consultants, NGOs/ faith based organisations, some businesses;
	Leadership	strong corporate leadership: event organisations	external leadership: Home Office; NGOs; MS consultants	strong corporate leadership: event organisations	law enforcement generally lead with examples of local authorities and few NGOs engaged in leadership of local and regional partnerships;
	Members' roles and functions	event organisation lead and develop terms/ codes of conduct informed by legal frameworks and industry standards for clients and suppliers	appointing (dedicated) responsibilities to key actors and developing appropriate accountability systems (recruitment and duty of care), access to training to increase awareness on MS; implementing a transparent decision-making process; better understanding of legal requirements to improve compliance (recruitment)	improve industry standards across organisations and their supply chains; move beyond compliance; eliminate zero-tolerance approaches and engage with suppliers; open forum to exchange ideas;	stakeholder engaging in partnership hold a senior leadership position or are empowered by senior leadership to enact changes within the company.
	Key characteristics of engagement	setting industry standards and direct engagement: maintaining long-term engagement with all suppliers; zero-tolerance	capacity building: discuss risk mapping and performance management; increased transparency in MS reporting;	setting industry standards and direct engagement: maintaining an 'open dialogue' with competitors; discuss long-term engagement with suppliers and subcontractors;	meaningful engagement: shared purpose, active and consistent contribution to discussion from all those engaged, and tactical results consistent with strategies discussed in meetings. actionable outputs, measuring the outcomes, and a level of adaptability from all partners.

Geographical Reach	local, regional and/or global	local and/or global - based on engagement with suppliers and clients;	local engagement with expert NGO, MS Consultants and the Home Office;	local and regional engagement with industry peers/ competitors	from local to global
Outcomes	Industry issues v Prevention, Protection, Prosecution	corporate focus: industry issues prioritised over MS focus;	corporate focus: industry issues and some MS focus (prevention); Training, awareness, auditing;	MS focus: Prevention	MS focus: Prevention, Protection, Prosecution
	Purpose / core issues	Training, awareness, auditing to address employment issues, payment issues, breaks, duty of care, labour intensity;	Training, awareness, auditing and KPIs for increased legal compliance; some MS training and increased awareness of specific industry risks	<i>beyond compliance:</i> Training, awareness, auditing and KPIs for increased legal compliance and MS prevention;	to share information across schools, communities, local businesses, and particularly with vulnerable people who may have limited access to information; to raise awareness of the threats of modern slavery and empower stakeholders to report cases of exploitation; to gather intelligence that enabled law enforcement to prosecute criminals; to address threats of MS and cross-border implications;
	Performance Management v Zero-tolerance approach	zero-tolerance;	unspecified	unspecified	performance management: planning, monitoring and evaluation, making improvements, developing capabilities, and ongoing communication between partner agencies throughout the duration of a partnership.
Barriers	Industry characteristics	Complicating factors: Priorities; commitment v compliance; zero-tolerance; denial of MS risks; lack of evidence; unspecified key roles and functions for MS;	Complicating factors: Priorities - short-term engagement; lack of performance measurement; commitment v compliance; zero-tolerance; denial of MS risks; lack of evidence; unspecified key roles and functions for MS;	Complicating factors: denial of MS risks; lack of evidence; unspecified key roles and functions for MS; communication; competitiveness;	Complicating factors: Priorities - short-term engagement; lack of performance measurement; commitment v compliance; zero-tolerance; uncertainty over members' interests; denial of MS risks; lack of evidence; unspecified key roles and functions for MS; communication; competitiveness;

	Limitations to current engagement	lack of mutually beneficial engagement (unilateral); strategic ambiguity and lack of strategic direction; language barriers - the use of imprecise terminology created conflation of exploitation with other issues hindering progress towards preventing MS	Inconsistent use of language and terminology - the use of imprecise terminology created conflation of exploitation with other issues hindering progress towards preventing MS; lack of mutually beneficial engagement (unilateral); Internal communication issues (between departments) resulting in lack of consistency and coordination;	strategic ambiguity and lack of strategic direction; language barriers: the use of imprecise terminology created conflation of exploitation with other issues hindering progress towards preventing MS	communication issues and a lack of transparency, commitment and contribution issues, conflicting interests and uncertainty about the interests of other stakeholders, and disagreement about which goals to prioritise particularly in partnerships that included industry stakeholders; lack of consistency and coordination internal and external; Internal communication issues (between departments) resulting in lack of consistency and coordination;
Participants' recommendations for improved engagement	Influence, leadership & power	use corporate leadership and power to influence suppliers' code of conduct;	invest in external expertise targeted to the specific risks faced by the organisation;	use corporate power to influence other in the industry and raise industry standards;	adaptable leadership based on desired outcome: Law enforcement (prevention, prosecution); NGOs (victim protection);
	Partnership scope	to add MS to the agenda and work with suppliers and clients on improving practices for the industry; to report key performance indicators (KPIs) used to measure effectiveness of the steps taken to identify MS risks; to increase transparency in MS reporting leading to improved industry standards	to report key performance indicators (KPIs) used to measure effectiveness of the steps taken to identify MS risks; to increase transparency in MS reporting leading to improved industry standards; to use MS specific terminology: risks of labour exploitation specifically identified and addressed.	to overcome competitive nature and perceive competitors as peers; to increase transparency in MS practices and communicate to peers leading to improved industry standards; to use MS specific terminology: risks of labour exploitation specifically identified and addressed.	to embed discussion outcomes onto business practices; to put performance measures in place to assess how well industry actors have performed against their goals; creating opportunities for discussion and information sharing to overcome communication issues;
	Benefits of engagement	mutually beneficial - improved relationship upstream and downstream - longer collaborations and stability;	mutually beneficial - events organisations who get the opportunity to improve awareness and practices, influence suppliers and even competitors; NGOs and Consultants gain funding and industry evidence - to advance understanding of specific industry risks;	mutually beneficial - organisations gain access to intelligence and industry specific threats and risks others experienced, learned about;	mutually beneficial - organisations gain access to intelligence and industry specific threats and risks others experienced, learned about;

Examples of partnerships seeking to address MS:	Partnerships that include events organisations:	n/a	Partnership with the Home Office (Glastonbury MSS)	n/a	n/a
	Partnerships from other sectors:	n/a	Hotels engaged in 'anti-trafficking' partnerships with ECPAT; hotels engaged with partnership with an NGO (Stop The Traffik) for training and awareness of staff on sexual exploitation; Global Freedom Exchange hotels engage with an NGO (Vital Voices) aimed at combating sexual exploitation and protecting vulnerable women; Solidarity Accor Hotels: local organisations and NGOs - to provide access to professional development; the Hilton Anti-Trafficking Fund seeking to prevent exploitation by supporting anti-trafficking with an NGO (Global Fund for Children);	Anti-slavery Hospitality Charter; Compliance Intelligence Network; Risk and compliance forum (labour subcontractors - from retail, agriculture and construction);	Hospitality Protocol - GLAA and hotels; Hotels engaged in 'anti-trafficking' partnerships with: NGOs, law enforcement, industry partners; Operation MakeSafe Campaign - law enforcement partner with hotels to train front desk staff across London, including UK heads of housekeeping and UK labour agency partners to raise awareness about child trafficking; Safer Slough Partnership - awareness campaigns generally led by the Police and managed by the Local Authority; Responsible Car Wash Scheme; Oxfordshire Anti-Slavery Network; Thames Valley Partnership - law enforcement, first responders, the Home Office, local authority, local businesses; over 25 regional multi-agency partnerships supported by the Independent Anti-Slavery Commissioner's Office (IASC) with the University of Nottingham Rights Lab (online toolkit); The Willow Project - local authority, Thames Valley Police, first responders, NGOs engaged in victim protection;

Table 8.1. Partnership development and opportunities for event organisations

9 Discussion

9.1 Introduction

This research aims to evaluate the role partnerships can play in addressing modern slavery (MS) from the perspectives of stakeholders in the UK event sector. Findings presented in the previous four chapters indicate that partnerships were not consistently understood by the internal and external event sector stakeholders involved in this research. The need for partnership to address this complex issue was highlighted by MS researchers, policy makers, the civil society, *and* the findings of this research (Cockayne, 2015; Christ and Burritt, 2018; Nottingham Rights Lab, 2018b; Blackburn et al, 2011; Dean and Marshall, 2020). However, the forms that partnerships should take, the roles and contribution of partners, or how they might best identify and deliver shared goals and responsibilities was still unclear in partnership research, especially for collaborations that include businesses.

Multi-disciplinary studies on partnership underline several approaches. Partnership scholarship on addressing complex issues suggests that Multi-agency Partnerships (MaP), Public Private Partnerships (PPPs), and Peer to Peer (P2P) collaborations are the most appropriate approaches to address MS. Organisational studies exploring profitability and economic development identify P2P, Transactional, and Contractual Partnerships as the most suited approaches for businesses. These approaches, integrated in the *Conceptual Framework*, become central to understanding the role partnership can play in addressing MS in the field of events, as I explore and theorise the perspectives of different actors. Evidence of these approaches to address MS in the event industry is illustrated in Table 8.1.

The findings indicate distinct perspectives on the role partnerships can play in addressing MS. These differences stem from stakeholders' meaning-making of MS leading to a distinct approach to partnership; while MS responsibility remains a disputed area. Based on the *Labovian model of narrative analysis* (Labov, 1972), five distinct narratives emerged focusing on *risks, people, compliance, collaboration, and action*. The narrative analysis offers a deeper understanding of the event sector's understanding of labour and sexual exploitation risks framed as industry issues, using CSR and HRM discourse. This highlights a methodological contribution of this study. The five narratives showcase different definitions and interpretations of MS which inform stakeholders rationale for action and their engagement in partnership:

- a. The *risk focused narrative* emerges from the analysis of MSS produced by events organisations and suppliers (venues, catering, and staffing suppliers). The narrative portrays MS as an *external issue*, largely associated with supply chains. It does not define MS nor does it identify any specific MS risks, and it suggests that event organisations are 'not operating in a high-risk sector'. The purpose of reporting is associated with *legal compliance under the MSA*, which is achieved in many instances, irrespective of the quality of reporting. To mitigate the risks associated with supply chains, companies rely on internal audits, zero-tolerance policies, and a sequence of five steps: *identify, assess, monitor, reduce, and protect whistle-blowers*. The lack of specific risks identification leads to untargeted responses that are not supported by existing policies within the organisations. Within this narrative there is no evidence of partnerships to address MS. However, some organisations refer to *Contractual Partnerships* with their suppliers to address exposure to the risk of MS occurring in

their supply chains. Partnerships are enforced through 'structured contractual documentation' determining suppliers to commit to complying with legislation and codes of conduct.

- b. The *people focused narrative* emerges from the analysis of MSS produced by events companies and suppliers (most of which are venues and hotels). Although the narrative does not define MS, it portrays MS as a risk to (vulnerable) people facing exploitation. The purpose of reporting is linked to organisations' *commitment to operating responsibly* and the impact organisations have on their employees, supply chain workers, and local communities. The attitude organisations have to reporting is reflected in the content and level of detail of the statements. Risks are associated with direct operation and supply chain. Labour exploitation is not acknowledged as a direct risk, but the industry is portrayed as 'labour intensive'; direct risks centre on CSE and sexual exploitation risks. Supply chain risks include HT, forced labour, child labour, and working conditions. To mitigate the risks of MS, companies rely on training, partnerships, and the same sequence of five steps: *identify, assess, monitor, reduce, and protect whistle-blowers*. The narrative contains some references of *Transactional Partnerships, P2P, and PPPs* linked to addressing CSE and sexual exploitation. The people focused narrative includes examples of partnership engagement and recognises the importance of partnerships and collaborations in the knowledge that no single business could tackle the risks of MS alone. However, as many of these organisations operate in hospitality, partnership evidence in the event sector remains scant.
- c. The *compliance narrative* emerges from the accounts of internal stakeholders in the event sector (event organisations and suppliers). It defines MS as a *distant issue* that does not pose risks to event organisations or the event industry. The narrative portrays a lack of awareness of MS and there is no evidence of engagement in partnerships to address it. There is, however, evidence of engaging in *relationships with clients and suppliers (Contractual Partnerships)* to address 'industry issues' linked to payments, recruitment, and subcontracting; these partnerships however do not have a MS scope; the rationale for action is framed as 'doing the right thing' and duty of care. The compliance narrative presents stakeholders having a *reactive approach to legislation and industry standards* in reporting on MS and engaging in collaboration. A potential *Transactional Partnership* against MS is considered with external actors, due to the benefits it would provide event organisations to overcome industry issues. The logistics of how this would be established and governed are unclear. The narrative portrays a *reluctance* to engage in P2P and PPPs.
- d. The *collaboration narrative* emerges from the accounts of external and (one) internal actors. It defines MS as a *human rights issue* and suggests that *partnership is the solution to address MS*. Specific risks linked to *labour and sexual exploitation* are identified. The collaboration narrative is rooted in extensive awareness of the implications of MS for the industry and it presents stakeholders having a *proactive attitude to partnership engagement* and developing *Transactional Partnerships, P2P, and PPPs* with industry stakeholder. The narrative emphasises the need for adaptability and helping industry actors to build capacity to identify and mitigate MS risks, to build policies and training by means of collaboration. It also discusses the

need for accountability and the debate between ethical and legal compliance in the sector.

- e. The *action narrative* emerges from the accounts of external and (one) internal actors. It defines MS as a *criminal issue* and suggests that *tactical action is warranted to disrupt MS*. While this narrative portrays extensive awareness of MS this relates to businesses in general and is less specific to the event sector. Specific risks linked to *sexual and labour exploitation* are identified. Partnership is seen as an *opportunity* with the caveat of *meaningful* engagement. The action narrative presents a *reluctance* to engage in PPPs with some industry actors due to conflicting interests. The membership, governance, and output of partnerships are documented, and examples are provided, however, there are few examples of such engagement that include businesses and none that include event organisations.

In short, findings indicate a lack of consensus over the role of partnership and the implications of different approaches to addressing MS. Partnership dynamics and the rationale for partnership are perceived differently by different categories of stakeholders, posing barriers to meaningful engagement. Therefore, this research suggests that the road to meaningful partnership engagement to address MS is best understood and represented as a *Partnership Continuum* where event sector stakeholders begin to engage in a capacity known to them and gradually join other types of engagement as their understanding of MS develops.

These findings led me to a series of questions which are the subject of this discussion chapter: *What is the role of partnership in addressing MS? What is the rationale for partnership? How prepared are industry stakeholders to engage in partnerships to address MS? And, finally, what does a partnership against MS look like for event sector stakeholders?* To address these questions, I begin by looking at *Partnership dynamics* and discuss actors' perspectives and meaning-making in constructing partnership as a relationship, solution, or opportunity. *Rationale for partnership* questions whether the industry is prepared to engage in partnership by looking at the level of awareness, the need for evidence of exploitation, and participants' views on MS responsibility. Lastly, *partnership continuum* theorises different approaches to partnerships and draws conclusions about the intertwined role different approaches can play in addressing MS in the event sector.

9.2 Partnership Dynamics

The five narratives consist of distinct interpretations and understanding of MS risks as well as several inconsistencies in the experiences and perspectives of actors on the partnership front. Partnerships against MS are also not consistently understood or defined by the different categories of stakeholders. Furthermore, they are not cohesive nor conclusive in clarifying the role of partnership or the rationale for it. To explore these areas further, in this section, I look at different stakeholders' priorities in addressing MS and how this informs their understanding of partnership, and I discuss actors' perspectives and meaning-making in constructing partnership as a relationship, solution, or opportunity.

9.2.1 Actors' Priorities and Perspectives concerning MS

Findings suggest that most event sector stakeholders' priorities are not consistent with those of external stakeholders engaged in partnerships and evidence fundamental misunderstandings about their purposes in addressing MS in the industry. This is a core finding of this study and it is significant because it informs that meaning, definition, and understanding of MS in relation to business activities shape the potential approach to partnership and actors' dynamics therein. In an attempt to better understand the distinct interpretation of the role of partnership, in this subsection, I discuss a) internal and external stakeholders' distinct priorities in addressing MS, b) their organisational context, and c) their perspectives on partnership.

Most industry stakeholders' views are underpinned by the *Compliance, Risk, and People Narratives*. Although the narratives bear some resemblance regarding the context in which they are shaped there are nuances to how MS and therefore partnerships are understood. These nuances pertain to the types of organisations from which participants and MSSs originate (events management, venues, and hotels) and the level of awareness in the industry (discussed later in the chapter). In contrast, two of the industry stakeholders engaged in this research - Mark and Rachel - have completely different views which are more closely related to the *Collaboration* and *Action Narrative* respectively; their views and experiences are distinct from one another and from other industry stakeholders presented in this research. Unlike the other industry participants engaged in this research Mark and Rachel's organisations do not operate exclusively in events or hospitality, they also operate across construction, apparel, retail, and agriculture, which are more advanced in relation to MS prevention, industry protocols, and MS risk mapping compared to events (LeBaron, 2014; Smit, 2011; GLAA, 2020).

The *Compliance* and *Risk focused Narratives* bear some similarities concerning industry stakeholders' perspectives regarding partnership engagement. These perspectives pertain to event organisations, suppliers, and some venues. Within those narratives there is lack of understanding and little awareness of MS risks. These industry stakeholders see partnerships as *relationships* with clients, suppliers, and auditors aimed at ensuring legal and ethical compliance. Their understanding of partnership is consistent with literature exploring Contractual Partnerships that aim to increase profitability and gain a competitive advantage for actors operating in a business context (Mohr and Spekman, 1994; Powell, 1987).

However, at the time of this research, these Contractual Partnerships did not target MS, rather industry stakeholders' priority was to be compliant with legal requirements and industry standards. Still, industry actors reflected on potential new relationships in the form of Transactional Partnerships with external stakeholders (such as auditors or the Home Office) that might aid their organisations in further addressing industry issues, hence the industry's reactive attitude to partnership engagement. The aim of this potential engagement would be to gain access to information and training on the implications of MS for their organisations. While these findings inform the industry's attitude to engagement, they pose a significant limitation to understanding the industry's views on the role of partnerships to address MS, their membership, outcomes, and leadership.

An alternative industry perspective on partnership engagement is presented in the *People focused Narrative* where the industry seeks to engage in Transactional Partnerships with NGOs, the Home Office, and in some cases in PPPs with Law enforcement agencies to access training, to increase staff awareness, to protect vulnerable populations, and to share

intelligence. However, although this narrative acknowledges that the industry is labour intensive, all Transactional Partnerships and PPPs (labelled as ‘anti-trafficking’ partnerships) focus on sexual and CSE. It is important to note that the *People focused Narrative* is reconstructed largely from MSS originating from event venues (hotels). Given that the hospitality sector is exposed to additional risks of sexual exploitation (Paraskevas and Brookes, 2018a) this finding informs that industry stakeholders’ perspectives on partnership are rooted in their interpretation of MS as a distant or external issue. To summarise, event sector stakeholders have a reactive stance to engaging in what they call relationships, which often manifest as Contractual or Transactional Partnerships, many of which do not have a MS scope. The priority for these actors is to ensure compliance to legal requirements and industry standards. While any other approaches to partnership are regarded with reluctance.

Research findings also evidence differences in external actors’ priorities in addressing MS whose perspectives on partnership engagement are presented in the *Collaboration* and *Action Narratives*. The lack of consensus over priorities when engaging industry stakeholders in PPP and P2P is rooted in their respective interpretation of MS, coupled with stakeholders’ respective experiences of engaging with events and other businesses. External actors focused on collaboration define MS as a human rights issue and engage with event organisations in Transactional, P2P, and PPP. They demonstrate versatile and proactive approaches to engage with industry actors to protect the human rights of vulnerable people. Meanwhile, external actors focused on action define MS as a crime and emphasise a need for tactical action to fight MS. They have a more rigid approach to partnership linked to their desired outcome of prevention, protection, or prosecution. These external actors see partnerships as an opportunity that not many businesses have the ability or willingness to engage in. This makes external actors focused on action reluctant to engage with the industry. They advocate for meaningful engagement, targeted responses, and measuring outcomes of PPPs or MaP (their preferred approaches). While these are key areas in partnership research on PPPs (Mohr and Spekman, 1994; Liu et al, 2014) they are not reflected in the practises or priorities of industry stakeholders. External actors focused on collaboration have some understanding and experience of how corporate interests manifests in relation to addressing MS. They develop strategies to engage with businesses and have several interpretations of the industry’s rationale for partnership. However, in many instances all external actors share a level of frustration of being unable to monitor the impact of some joint strategies due to the industry’s short-term engagement.

This research finds that these nuanced perspectives are rooted in stakeholders’ understanding of MS as follows: industry stakeholders who define MS as a distant issue see partnerships as *relationships* with clients and suppliers aimed at ensuring legal and ethical compliance; external actors focused on collaboration who define MS as a human rights issue view partnerships as the *solution* to addressing it; and, external actors focused on action who view MS as a crime believe partnerships are an *opportunity* that requires meaningful engagement. This marks a core contribution to knowledge concerning the perspectives of different categories of stakeholders on the meaning of partnership.

9.2.2 Partnerships and Conflicting Interests

Most industry stakeholders see partnerships as relationships with clients, suppliers, auditors, and the Home Office. These relationships take the approach of Contractual and Transactional

Partnerships and are aimed at ensuring compliance to legal requirements and industry standards. The notion of corporate interest becomes key in Contractual and Transactional Partnerships as findings demonstrate that most industry stakeholders are reluctant to engage in any collaborations that would not benefit them, be they P2P or PPPs seeking to address MS. This is observed both in individual accounts and organisations' response to MS (participants' accounts and MSSs). The opportunistic behaviour exhibited by many industry actors demonstrates that even when looking at partnerships to address complex issues, organisations still develop relationships to achieve or maintain a competitive advantage (Powell, 1987; Mohr and Spekman, 1994). While this informs research on partnership, it underlines a significant practical limitation for external actors seeking to engage with businesses in PPP or P2P to address MS.

In exploring the reluctance of industry stakeholders to engage with external actors, findings indicate that lack of trust poses a significant barrier especially to P2P and PPPs. Research on PPPs development suggests that trust, willingness to coordinate activities, and a sense of commitment from all those engaged are paramount to the success of a partnership (Mohr, 1994). However, these are challenging areas for many businesses, who look at partnerships from a competitive organisational position. This is an important finding as competitiveness hinders industry actors' ability and interest to engage in P2P and PPPs. This is particularly relevant to understanding industry stakeholders' hesitation to engage in P2Ps. The level of competitiveness and strategic ambiguity have been explored in relation to MS and studies indicate that companies decide against full disclosure of positive information and report less in order to mislead their competitors or other stakeholders (Davenport and Leitch, 2005). Research also shows that companies could make use of such ambiguity in their MSS to avoid engaging in actions against MS or to delay them (Meehan and Pinnington, 2021).

Partnership as a solution comes from an understanding of the industry's reactive stance to legal requirements and industry standards. To achieve engagement with the industry, external actors focused on collaboration employ several strategies: they use the authority of law enforcement, they engage in the process of translation to facilitate communication (discussed in later in the chapter), they use evidence of exploitative practices in the industry (or in other industries) that lead to potential reputational damage. This shows that although their rationale for partnership is to protect human and workers' rights, they understand that the industry has distinct interests: maintaining a competitive advantage and corporate image. In the context of ethical compliance these interests translate in doing the right thing, while compliance with legal requirements means recruitment checks and MS reporting. The industry is perceived as reactive and external actors attempt to offer what the industry is seeking: training, MS reporting templates, and in some isolated instances capacity building.

In contrast, stakeholders who view partnerships as an opportunity advocate the need for action and do not seek to engage with industry actors. In fact, they are reluctant to engage unless the industry appears prepared for meaningful engagement. Their hesitancy to collaborate with industry stakeholders is the result of unsatisfactory previous collaboration, where businesses from different industries failed to communicate their priorities. Consistent with external actors focused on collaboration, they believe the main reason many businesses join partnerships is for training and awareness or for developing their own understanding of legislation and obligations, which is consistent with what industry stakeholders expect. Evidence from actors focused on action shows that this clearly detracts from the development of PPPs which are focused on prevention, protection, and prosecution. Yet, this could be a first necessary step

towards bringing companies into a stronger partnership. Major concerns arise for actors focused on action when industry stakeholders fail to communicate their interests in partnership engagement which are inconsistent with their own. Openness is not natural for management, as recognised in business management studies (Mohr and Spekman, 1994). This means that it falls onto external actors to develop communication strategies and information sharing between partners. Within Transactional Partnerships and even PPPs, it is external actors focused on collaboration who adapt their strategies to communicate and engage with businesses.

While external actors who see partnership as a solution to MS are adaptable and develop strategies to engage businesses, those who see partnership as an opportunity are less prepared to do so. These distinct interpretations of partnership demonstrate that there is a barrier between business actors and external actors focused on action that neither is yet prepared to cross. External actors focused on collaboration are attempting to navigate this barrier by developing their own understanding of corporate interests. This uncovers and leads to a discussion of *conflicting interests*.

A core finding is that the distinct perspectives and priorities of stakeholders concerning MS lead to conflicting interests that present a fundamental barrier to partnership development and long-term engagement for two reasons: firstly, there is a level of (uncommunicated) disagreement about which MS risks is most salient for the stakeholders engaged in partnership, and therefore disagreement about which goals to prioritise particularly in PPPs. This issue can lead to tension among stakeholders thus compromising the impact of their collaboration (Mohr and Spekman, 1994; Liu et al, 2014). Secondly, event stakeholders are criticised (by all external actors) for lacking commitment and entering a partnership that aims to affect change in the industry when in fact they are only interested in gaining access to information and resources; this is particularly the case with Transactional Partnerships and PPPs. This is important because research cautions that it leads to one-sided partnerships (Clayton et al., 2010; Thompson and Jesiek, 2017) where businesses engage to benefit from other stakeholders' expertise but fail to contribute or to implement the actionable points agreed in meetings. In both scenarios conflicting interests are closely linked to a lack of communication coupled with lack of transparency. Communication strategies used by stakeholders engaged in partnership are critical to partnership success. This is observed in the strategies employed by external actors focused on collaboration (discussed in the upcoming section).

Conflicting interests also lead to additional barriers including lack of commitment and uncertainty about the interests of other stakeholders. A lack of commitment characterises industry stakeholders' short-term engagement in partnership, their inability to enact strategies discussed, or their failure to contribute to a partnership setting. To address conflicting interests, Partnership Theory argues that the scope of partnerships needs to be closely linked to its membership to ensure a shared interest (Mohr and Spekman, 1994). This means that the aim of the partnership would be influenced by the stakeholders who engage in it, and therefore the most suited approach. To some extent this is reflected in the four approaches to partnership, however, the fact that some are not seeking to address MS reaffirms conflicting interests. Moreover, the fact that some stakeholders are not transparent about what they wish to gain from entering a partnership poses additional limitations of communication and transparency.

A final point made is that conflicting interests also affect performance management. This highlights an area recognised by all external stakeholders as a difficulty they experience when engaging with the industry. In contrast, performance management is not employed or discussed by any internal actors. External stakeholders struggle to assess the success of strategies employed with businesses in the context of Transactional Partnerships and PPPs, while P2P and Contractual Partnerships demonstrate no evidence of performance management. Researchers recognise that partnerships seeking to prevent MS are even more complex than any other collaborative approaches, and advocate for performance measurement mechanisms to assess the partnership's success, whether it is at the organisation or project level (Liu et al, 2014; Nottingham Rights Lab, 2018a). Findings indicate that performance management is not only an issue in partnerships, but also in MS reporting. According to the Home Office, carefully designed KPIs could help organisations demonstrate their progress over time in preventing MS in their business or supply chains (HM Government, 2017). However, this is not the case in most of the analysed statements. This renders performance management a particular area of concern for organisations' practises and partnerships that include industry stakeholders.

The findings evidence multi-faceted and at times conflicting interpretations of why stakeholders (would) address MS and engage in partnerships viewed as *relationships*, *solutions*, or *opportunities*. This research suggests that these views stem from how stakeholders understand MS and its implications portrayed in each narrative as *external*, *distant*, *human rights*, or *criminal issues*. While these distinct views provide nuance to partnership scholarship and advance knowledge of the implications of different approaches to MS partnerships, they lack cohesiveness and there is no consensus on what a partnership might look like for the event sector, which stakeholders might be involved, and what the outcomes might be. More importantly, findings indicate that conflicting interests pose a core barrier to partnership development from which additional limitations arise, including lack of commitment and uncertainty about the interests of other stakeholders, lack of communication and transparency, and performance management issues.

9.3 Rationale for Partnerships to address MS

The nuanced perspectives and priorities of internal and external actors are rooted in their understanding of MS. Findings show that stakeholders define MS based on their level of awareness of the MS risks in the industry. In exploring the rationale for partnership, I discuss these nuanced perspectives and question whether the industry is in fact *prepared* to engage in partnerships against MS. I argue that the extent to which industry stakeholders are prepared to engage in an actual (or potential) partnership is situated in their understanding of MS. Therefore 'prepared' relates not only to their *willingness*, but also the extent to which they are *equipped* to engage: their level of awareness of specific risk of MS in the industry, and their understanding of their role in responding to MS. This research establishes that a large extent of the event industry is not prepared to engage in partnerships seeking to prevent MS for two reasons: the lack of awareness and evidence pose difficulty in equipping industry stakeholders to develop partnerships; additionally, stakeholders' inconsistent views on MS responsibility raises questions over their willingness to engage in addressing MS and in partnership.

9.3.1 Awareness and evidence of exploitation

The findings from the *People, Risk, and Compliance Narratives* show that most industry stakeholders lack awareness of the complex risks associated with MS and their implications for events, especially surrounding labour exploitation. Unwillingness to engage in partnership and even to acknowledge the implications of MS has been heavily criticised in the *Collaboration Narrative* by participants who believe that those who lack awareness do so because of their unwillingness to become aware. Yet, the *Action Narrative* shares an optimistic view of ‘increased awareness and progress’ in hospitality and events since the MSA of 2015; although, this may be the result of prolonged engagement with specific businesses as it is not consistent with findings illustrating industry stakeholders’ awareness. These nuanced findings portray fragmented and limited awareness on the risks of MS in the industry, especially concerning labour exploitation. Findings point to several interconnected factors contributing to this level of awareness in the sector: a) the use of imprecise language and terminology; b) the lack of evidence of cases of exploitation; and c) businesses’ unwillingness to become aware.

In the *People, Risk, and Compliance Narratives*, I observe an imprecise use of language and terminology in the sector. Thus, the risks of MS are generally described as industry issues, prevention is understood as duty of care, and risks of labour exploitation are framed as employment and recruitment issues. This leads to not discussing the prevalence of labour exploitation and reverting to HRM discourse pertaining to industry issues. Industry stakeholders’ inability to articulate exploitative practices, human, and labour rights issues is not unique to events, and is in fact a widespread issue for businesses. Similar findings emerge from hospitality sector studies exploring migrant workers’ experiences (Goethals, 2019). The use of (un)specific language and terminology is part of debates surrounding translation of MS, human, and labour rights in business (O’Kelly, 2019; McVey et al., 2022; Smit et al 2021; Sarfaty, 2020). In the context of this research, translation has both favourable and unfavourable consequences: on the one hand, it enables external actors focused on collaboration to communicate with businesses which can facilitate partnership development; on the other hand, it perpetuates a lack of awareness by continuing to mislabel MS risks as industry practices.

External actors focused on collaboration observe that in a business context MS language is replaced by CSR and HRM discourse, whether this is due to lack of awareness or unwillingness. They perceive this as a characteristic of businesses and adapt their own discourse by engaging in the process of translation to collaborate with businesses. This strategy is framed as ‘speaking the same language as businesses’ in the *Collaboration Narrative*. It is evidence that external actors focused on collaboration are performing the role of ‘invisible actors’ (Sarfaty, 2020) who provide a key role in shaping how legal norms are interpreted and supply chain governance operates in practice (Sarfaty, 2020; Smit et al, 2021). This is a novel finding pertaining to translation as a means of facilitating partnership to address MS, where external actors adopt CSR and HRM language and thus avoid MS terms. This leads to a communication compromise for external actors who believe partnership to be the solution to MS, and who would otherwise face further difficulties in engaging businesses. Findings show that translation proves successful for some external stakeholders to engage businesses, this means that such actors are in a unique position to gradually introduce MS specific language to industry actors and increase awareness of labour exploitation in the industry. This is an important finding with practical implications that could contribute to educating and equipping industry actors with the means to identify MS and articulate its

implications. It would also address some of the problems concerning the ‘downside’ of translation.

The downside of the translation process acknowledged in MS and human rights scholarship (Sarfaty, 2020) is that it neutralises and dilutes the extent of the problem (McVey et al., 2022; Merry and Levitt, 2019). Scholarship advocates for use of appropriate terminology especially for industries facing high risk of exploitation such as events (Donohue-Dioh et al., 2020; Yea and Chok, 2018). In line with academic research on the impact of language on vulnerable people (Donohue-Dioh et al., 2020), this research concurs that the use of unspecific terminology carries the risk of perpetuating the lack of awareness. Currently, the use of unspecific language and terminology undermines event stakeholders’ ability to articulate risks and exploitative practices associated with MS. This further highlights the need to gradually introduce MS specific language and to equip both industry actors to spot and articulate signs of exploitative practices. Therefore consultants, NGOs, and others engaging with businesses in Transactional Partnerships should encourage specific language and terminology of human rights and MS in their communication to increase awareness and educate events organisations and their workers (Goethals, 2019; Yea and Chok, 2018). The expectation is that introducing MS terminology would lead to educating and potentially influencing corporate practices. Businesses would be able to spot signs and develop mechanisms to address risks of labour exploitation.

Evidence of exploitation is also a key area of discussion concerning the rationale for partnership. Research findings indicate that the limited evidence of cases of exploitation in the industry contributes to the lack of awareness of MS and especially labour exploitation. The *Action and Collaboration Narratives* indicate that external actors frequently rely on anecdotal evidence when engaging with industry actors and businesses generally. They argue the ‘need for visibility’ to address the lack of awareness, to build a strong case about MS, and to facilitate collaboration in the sector. Consistent with academic literature, participants ascribe the lack of evidence to the ‘hidden nature of exploitation’ (Moser, 2012; Bales, 2007) and its ‘lack of observability’ (Crane, 2013: 54). In addition, they believe it to be linked to the lack of transparency in MS reporting, and in disclosing cases of exploitation. Furthermore, findings indicate that lack of evidence contributes to a lack of awareness and knowledge on how MS is linked to businesses. The need for visibility is significant to partnership engagement given the reactive stance and compliance mindset of many businesses; this research argues that evidence of exploitation would determine industry actors to engage in collaboration. This argument is based on research findings that show external actors (whether focused on collaboration or action) use examples of instances of exploitation as a strategy to determine businesses to improve internal practices and engage in partnership. Findings show that examples are used not only to raise awareness of definite, strong, or possible risk indicators, but also to alert industry stakeholders of the risks of reputational damage. This shows that external actors are tailoring their strategies according to corporate interests.

An inconsistency emerges relating to the types of exploitation employed as examples within this strategy. External stakeholders focused on action and collaboration (including MS consultants, Law Enforcement, Local Authority, and NGO representatives) identify labour exploitation as the main threat associated with MS faced by organisations in events and hospitality and criticise the industry’s efforts to prioritise sexual prevention instead of labour; however, when attempting to collaborate with industry stakeholders many discuss examples of sexual exploitation, thus contributing to the misconception surrounding the prevalence of

sexual exploitation in the industry. This is a recurring inconsistency observed in the *Collaboration* and *Action Narratives* with serious implications on the level of awareness of labour exploitation in the industry. MS scholarship investigates the increased attention given by businesses in hospitality to sexual exploitation and associate it with 'victim blaming' whereby the 'voluntary' element and the range of relationships between victims and recruiters pose difficulty for audiences to identify labour exploitation (Phung and Crane, 2018; Ollus, 2015; Skrivankova, 2010). External actors use this strategy in an attempt to overcome this difficulty and the industry's reluctance to engage in partnerships to address labour exploitation. However, this strategy is concerning because it provides businesses with a narrative they are comfortable with: that of a blameless actor, where MS risks are mainly associated with their venues (hotels used for sexual exploitation) and not their reliance on subcontracted labour. Furthermore, the strategy leads to a vicious cycle where the industry lacks the awareness and the means to identify cases of labour exploitation, resulting in lack of evidence and urgency for the industry to embed mechanisms to identify cases of exploitation.

Lack of awareness coupled with lack of evidence pose difficulty in equipping industry stakeholders to develop partnerships. Seven years after legislation has been introduced in the UK (MSA) a large extent of the industry is not engaged in any debates concerning MS. This research finds that the industry is yet unprepared to become aware or engaged in partnership without further external intervention and evidence of MS risks associated with labour (and sexual) exploitation.

9.3.2 MS responsibility

Additional inconsistencies emerge regarding MS responsibility and the extent to which this is embedded in businesses' responses and practices. This finding is important in addressing the question of the (un)willingness of businesses to move beyond compliance. It concerns three core issues: a) inconsistency between MS reporting and practice; b) disagreement over what MS responsibility would look like in practice; and c) disagreement over MS responsibility for outsourced workers.

Evidence from MS reporting (presented in *chapter 5*) indicates that responsibility for MS is already in place in many organisations across the industry. However, participants' experiences contradict this. Findings from the *Risk* and *People focused Narratives* indicate that responsibility for MS is distributed across the company, whereby industry stakeholders hold different roles against MS at group, regional, and local level (as illustrated in *Table 5.2*). However, the *Compliance Narrative* contradicts this. There is no evidence of responsibility embedded in any of the organisations the research participants were working for at the time of the interview or beforehand. This questions the credibility of practices and processes reported in the statements. This means that internal actors discuss MS responsibility as a potential future practice, when in fact their practical response is ensuring legal and ethical compliance. The notion of responsibility is therefore disputed by different stakeholders. In contrast to the industry's response, external actors focused on action stress the importance of embedding MS responsibility into businesses as a means to drive change in corporate practice. Meanwhile, external actors focused on collaboration argue that responsibility should be replaced by accountability through increased regulation and legislation to determine businesses to change their practices.

There is a belief among internal stakeholders that event professionals could adopt some MS responsibility and attributions yet how this would influence their practices remains unclear. This leads to disagreement over what MS responsibility would look like in practice. Industry stakeholders argue for embedding MS responsibility onto existing roles such as Human Resources, CSR, or Procurement, similarly to what is pledged in the MSS; external actors focusing on action suggest that dedicated roles need to be developed within event organisations such as MS Champion or MS Officer. This leads to a conversation on MS being perceived as an 'auxiliary responsibility'. This is important because attribution of responsibility can create ambiguity over professional boundaries, which can affect stakeholders' capacity to perform (McDonald, and Young, 2012; Benstead, Hendry, and Stevenson, 2017).

While there is a lack of consensus amongst research participants over dedicated versus existing MS responsibility, evidence from the industry shows that attributing responsibility to existing roles does not lead to operational changes. While CSR research indicates that dedicated roles (such as sustainability champions and officers) do not help embed CSR practice in a company (Humphreys and Brown, 2008; OECD, 2017). Champions or officers are often isolated against other departments that have the clear aims and strategy to reduce costs and therefore encounter challenges due to a lack of power to enact change (Aslaksen et al., 2021; Carroll, 2021). This means that both dedicated and existing MS responsibility face potential limitations if the positions in question lack seniority and power. Lack of power relates to the inability to implement actions discussed in PPPs or Transactional Partnership without senior management approval. This is a common issue for CSR and HR managers who attend meetings, understand the implications of MS, but lack the power to enforce change without approval from top management. Lack of power also impacts the implementation of policies that are developed but not consistently applied across departments (McDonald, and Young, 2012).

This in turn leads to inconsistencies between departments and poses a significant issue for industry stakeholders resulting in lack of communication and coordination. Research stresses that the quality of information transmitted and the joint participation of actors across departments in planning and goal setting send important signals to all actors engaged (Powell, 1987). This means that event stakeholders engaging in partnership should hold a senior leadership position and be empowered by senior leadership to enact changes within the company. Moreover, companies need to embed MS responsibilities throughout organisational levels and operations to address MS risks linked to management and organisation labour practices (Crane 2013). This means that changes to corporate practice are not tasked to a single role, but in fact driven by leadership across organisational structure in what has been called a 'top-down approach' (Donaldson and Preston, 1995; Benstead, Hendry, and Stevenson, 2017; Moran et al. 2006). This is important as it would increase participation from those concerned at the level of operations and would embed values and standards by integrating them throughout the organisation.

A final point concerning MS responsibility surrounds outsourced labour, duty of care, and reliance on digital platforms. Labour providers and event stakeholders disagree over who bears responsibility towards outsourced seasonal staff. In responding to industry issues, ethical compliance framed as duty of care is discussed in the *Compliance Narrative*; however, an inconsistency is observed surrounding duty of care for subcontracted workers: labour providers view it as the responsibility of their clients to ensure seasonal staff wellbeing, while HR Managers and Directors in events devolve responsibility to agencies to look after 'their

staff. This is highly concerning given that the UK has the largest most fragmented agency sector in Europe (Crane, et al. 2019), with a significant proportion of small, local operators supplying mainly low-status migrant workers (Cockbain, et al. 2018). Evidence from the ILO (2011) suggests that a third of all forced labour is facilitated through labour providers or third-party agents, particularly where debt bondage and trafficking are involved (Barrientos, 2013). The considerable amount of temporary, casual, and other forms of contingent labour in events is supplied and often outsourced to third party labour providers (Crane et al, 2019). While debates surrounding duty of care are ongoing, this means that subcontracted staff are overlooked without increased regulation to compel organisations to change their outsourcing practices.

Findings also show that subcontracted staff, many of whom are migrants and students, are subject to non-compete clauses. This means that they are unable to secure permanent employment with clients or competitors of their contractual agency unless they spend 3-6 months working outside the industry. Research shows that lack of viable alternatives manipulated by an employer or agent coupled with substandard working conditions can be part of a forced labour situation (Anderson and Linden, 2005). While this is distinct from bonded or forced labour, temporary migrant workers experience forms and degrees of what has been called 'unfreedom' (LeBaron, 2014; 2018; Yea and Chok, 2018) rooted in contracts that tie their freedom of movement and migration status to a single employer (Frantz, 2013; LeBaron, 2018; Yea and Chok, 2018). The UK unregulated labour subcontracting system coupled with non-compete clauses is particularly concerning for the seasonal migrant workers in the event industry, because it severely restricts their mobility and poses difficulties in changing jobs or employers.

The reliance on IT platforms poses an additional layer in devolving responsibility towards outsourced staff. Event organisations and labour providers are reliant on IT platforms for recruitment, training, payment, and staff management. Practitioners and policy makers engaged in trafficking and forced labour prevention as well as ethical labour providers share concerns for current recruitment practices via digital platforms which enhance migrant workers' vulnerability (Milivojevic et al, 2020; ILO, 2015; GLAA, 2020). As one labour provider phrased this, digital platforms reduce workers to 'a name on screen' and create distance between outsourced staff and the companies employing them. Furthermore, the 'distance' created by digital platforms contributes to the lack of observability of labour issues and potential risks concerning MS.

This research highlights inconsistencies between MS reporting and practice leading to questions over the statements' credibility. More importantly disagreement over MS responsibility for outsourced workers impacts three core areas of labour in events: ambiguous duty of care responsibility for outsourced staff, devolved responsibilities to labour providers, and reliance on digital recruitment platforms leading to lack of observability. Furthermore, new perspectives on partnerships emerge, as a contribution to knowledge, by evidencing misunderstandings of stakeholders' priorities in addressing MS in the event sector. Partnerships are currently ineffective in events because many stakeholders lack awareness of the implications of MS but also due to conflicting interests and distinct priorities. While the notion of MS responsibility is disputed and misunderstood by actors in the event sector.

9.4 A Partnership Continuum

This research set out to analyse the role that partnership can play in addressing MS from the perspectives of stakeholders in the UK event sector. Findings indicate that different categories of stakeholders have distinct interpretations and preferred approaches to partnership. This thesis proposes that instead of replacing each stakeholder's vision of partnership with a standardised approach to partnership, they are provided with a *Partnership Continuum* whereby their needs and their responsibilities are seen as an evolving process where each stage is synergetic to their own evolving interests.

Findings inform that the event sector is not currently prepared to meaningfully engage in partnerships to address MS. However, this research finds that the need for partnerships to address MS remains undisputed. Using the Conceptual Framework as a foundation for this empirical research, findings yield new perspectives on the partnership front which inform four approaches to partnership: *Contractual*, *Transactional*, *P2P*, and *PPPs*. These approaches carry both academic and practical contributions to knowledge. In this section, I link the four approaches to draw conclusions about the intertwined role they can play in addressing MS in the event sector.

Literature on partnership theorises the effectiveness of partnerships that change as they grow from informal groups or networks to more mature partnerships exhibiting a mix of wider network meetings and more operationally focused sub-groups, organised by area or function (Hough et al., 2005). The Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Business Conduct (OECD, 2017) promotes developing partnerships based on a common understanding among stakeholders. Therefore, I argue that the road to meaningful partnership engagement to address MS takes the shape of a continuum where industry stakeholders begin to engage in a capacity known to them and gradually join other types of engagement, while maintaining the incipient forms of engagement. This is important because a *Partnership Continuum* could support the development of collaborations and interventions that enable events sector organisations to engage with peers, NGOs, law-enforcement agencies, and policy makers in addressing MS. I design the *Partnership Continuum* in four stages informed by the approaches to partnership evidenced by the findings of this research: *Contractual*, *Transactional*, *P2P*, and *PPP*. Each stage of the *Partnership Continuum* details core elements of engagement including membership, outcomes, geographical reach, leadership, performance management, potential limitations and solutions, as seen in *Figure 9.1*.

The continuum seeks to improve industry actors' level of awareness on MS risks, while also considering their interests and priorities linked to addressing MS but also industry issues, legal, and ethical compliance. In line with scholarship supporting partnership engagement that changes as it gains maturity (Gardner, 2018; Nottingham Rights Lab, 2018a;), industry stakeholders are to further expand their engagement to also partner with competitors in industry networks, leading to active engagement in PPPs. This means that ultimately industry stakeholders gain a good level of awareness on the implications of MS for the industry and robust preventive mechanisms prior to engaging in PPPs. This would prepare industry actors to contribute to discussion in their engagement in PPPs and implement further changes discussed.

This research suggests that adding variety to partnership by integrating the four approaches is important to enable stakeholders to engage in a capacity suited to their level of understanding and interest (Shier and Handy, 2015; Badigannavar and Kelly, 2012; Klijn and Teisman, 2003). It further argues that the *Partnership Continuum* is warranted to suit the priorities of internal and external stakeholders, while also accounting for the barriers which limit their engagement. Thus, incipient stages of the continuum equip industry stakeholders to engage in the subsequent ones. Consistent with external stakeholders and scholars advocating for adaptability on the partnership front (Mohr and Spekman, 1994; Goldblatt, 2010) partnership engagement takes distinct unconfined forms within this continuum which are structured in four stages, as follows:

Stage 1: Events organisations develop Contractual Partnerships with suppliers and clients to identify and address MS risks and industry issues.

Within the *Partnership Continuum*, the main outcome of a Contractual Partnership would be to overcome compliance behaviour by developing and implementing MS policy internally and across supply chains; demonstrating duty of care, improved recruitment, and labour standards for seasonal and permanent workers; most importantly this stage enables organisations to embed MS responsibilities throughout organisational levels and operations to address MS risks linked to management and organisation labour practices (Crane 2013). Therefore, the scope of Contractual Partnerships is to identify and address MS risks and industry issues through training, awareness, auditing to address employment issues, payment issues, breaks, duty of care, labour intensity explicitly labelled as risks of labour exploitation. More importantly this type of collaboration would enable industry stakeholders to embed performance management tools to monitor and measure progress, assess performance, and identify improvements; KPIs to assess effectiveness of internal and collaborative measures, in line with the TiSC Guidance (HM Government, 2021). It is important to acknowledge that the industry has demonstrated a reactive attitude to MS prevention and partnership engagement. However, the current expectation from some external actors that industry stakeholders engage meaningfully and change their practices overnight is unrealistic, given the industry mindset shaped around compliance, profitability, and competitive advantages. This means the stimuli to drive the industry to overcome the compliance mindset needs to be external: regulation, increased visibility leading to increased awareness, and stronger legislation.

A Contractual Partnership with clients and suppliers could be developed simultaneously to Transactional Partnership, while also acting as a precursor to engaging P2P networks. This argument is supported by evidence that the presence of contractual engagement positively contributes to partnership commitment (Alonso and Andrews, 2019; Canzanelli, 2013). Contractual Partnerships focused previously on survival and growth in the industry are to add MS to supply chain collaboration through the lens of a *Partnership Continuum*. This research further argues that adding MS focus to Contractual Partnerships is mutually beneficial to event organisations and their suppliers. The current compliance mindset and zero-tolerance approach characteristic to many, can be replaced by longer collaborations and stability (Ali, et al., 2019; Shin, Park, and Park, 2019) where both clients and suppliers understand the threat of MS and are prepared to take the steps to address it. It also means that organisations contribute to improving industry standards and overcome risks of reputational damage.

Stage 2: Event organisations engage in *Transactional Partnerships* with external actors (NGOs, MS consultants, the Home Office) to identify and address MS risks.

The outcome of a Transactional Partnership would be to build capacity through training and increase industry stakeholders' awareness of MS risks, enabling them to use MS specific terminology; this engagement would also lead to increased visibility on MS risks, developing targeted response against MS, and measuring progress and effectiveness through KPIs (internal and collaborative). Engaging in a Transactional Partnership simultaneous to Contractual Partnerships, means that the event organisations become equipped by evidence and expertise from external actors to improve their awareness of MS risks, use appropriate language and terminology that enables them to articulate and communicate MS risks with clients and suppliers, and embed MS preventive practices in their internal operations: including due diligence and risk mapping which can also positively impact the Contractual Partnerships.

An important finding informs that external actors focused on collaboration (many of whom are MS consultants and NGOs) can mediate the gap between the industry and other external actors. MS consultants and NGOs have an informed practical approach due to their prolonged engagement with businesses; they also have a strong understanding of corporate interests, behaviour, and motivation to engage in partnerships with external actors. However, extant engagement is tailored around business needs, where external actors engage in translation and adopt CSR and HRM language to avoid MS terminology (McVey et al., 2022; Merry and Levitt, 2019); this leads to a blurring of boundaries recognised by scholarship on partnership (Thompson and Jesiek, 2017). This means that MS consultants and NGOs are in a unique position to gradually introduce MS specific language to industry actors and increase awareness of labour exploitation in the industry. This is important because they can use Transactional Partnerships to challenge MS assumptions and positively impact industry behaviour. This would contribute to educating and equipping industry actors with the means to identify MS and articulate its implications.

Stage 3: Event organisations engage in *P2P* networks.

P2P networks can enable industry actors to engage with competitors to address MS risks and industry issues to improve industry standards. This engagement can lead to more detailed and transparent MS reporting for the industry; it can generate evidence and increased visibility on MS risks; and it can enable event sector actors to work collaboratively on addressing industry issues by improving recruitment and employment standards for the industry, which would be applicable to other industries.

P2P engagement received contrasting reactions from event sector stakeholders: few believed it to be a first step in developing partnerships against MS, while the majority were hesitant to engage with, what they believed to be, competitors due to the difference in operations and (un)ethical behaviour. Two possible explanations are offered for their reluctance: firstly, there is a clear pattern of lack of awareness leading to reluctance to engage in partnership; secondly, a sense of competition rooted in fear of reputational damage amongst businesses is deterring their involvement. Within a *Partnership Continuum*, the former would be addressed in previous stages of engagement motivated by increased regulation, engagement with NGOs and MS consultants; additionally, the more industry stakeholders engage in P2P networks, the more this becomes an industry standard determining others to follow suit. The latter poses a significant barrier acknowledged in partnership research. Whilst interdependence is intrinsic

to all stages of partnership, it is even more important in a P2P engagement to overcome the competitive element (Anderson and Narus, 1990). Acknowledging their competitive nature, implies that partners rely on their mutual dependence and their willingness to work for the survival of the relationship (Mohr and Spekman, 1994).

Stage 4: Event organisations engage in PPPs

Finally, the P2P network acts as a precursor to PPPs, where industry stakeholders could engage simultaneously in other types of engagement. Within the *Partnership Continuum*, the main outcome of a PPP would be prevention, although victim protection and/or prosecution might also be in scope of some collaborations. This stage of the continuum is most consistent with scholarly conceptualisation of PPPs and MaPs seeking to address MS, where performance measures must reflect the context to which they are applied and the 'lines of accountability' in ensuring goals are met (Goyal and Mishra, 2016; Nottingham Rights Lab, 2018a). Barriers to meaningful engagement are overcome in previous stages that address several of the conflicting interests informed by participants. As noted in the *Action Narrative*, the main reason many industry stakeholders joined partnerships was for training and awareness or for developing their own understanding of legislation and obligations, consistent with what industry stakeholders express in the *Compliance Narrative*. The *Partnership Continuum* facilitates training and awareness through Transactional Partnerships where industry stakeholders engage with NGOs and MS consultants. This means the extent to which industry stakeholders engage in PPP for reasons inconsistent to other partners is reduced, meaning those who do engage are more likely to be focused on tactical action. While the structured and relatively rigid boundaries for partnership engagement would pose fewer, if any, limitations to industry stakeholders equipped to PPP engagement. Thus, industry stakeholders who engage in PPPs are equipped to contribute, in a mutually beneficial capacity (Christ and Burritt, 2018).

The adaptable leadership, introduced in the *Action* and *Collaboration Narratives*, means that Law Enforcement and GLAA can lead initiatives focused on prosecution and prevention; Central and Local Authorities can support prevention and protection through policy development, while NGOs, MS consultants, and faith organisations could lead initiatives focused on protection and prevention. Performance management is at the core of the Partnership Continuum: KPIs are used to monitor and measure progress and identify improvements throughout all stages of engagement. According to the Home Office, carefully designed KPIs could help organisations demonstrate as clearly as possible if they were making progress over time in preventing MS in their business or supply chains (HM Government, 2017). The four stages of the partnership continuum are informed by scholarship and approaches that different stakeholders are comfortable and familiar with, making each scenario more attainable and realistic for those engaged in it and thus increasing its rate of success.

A partnership continuum

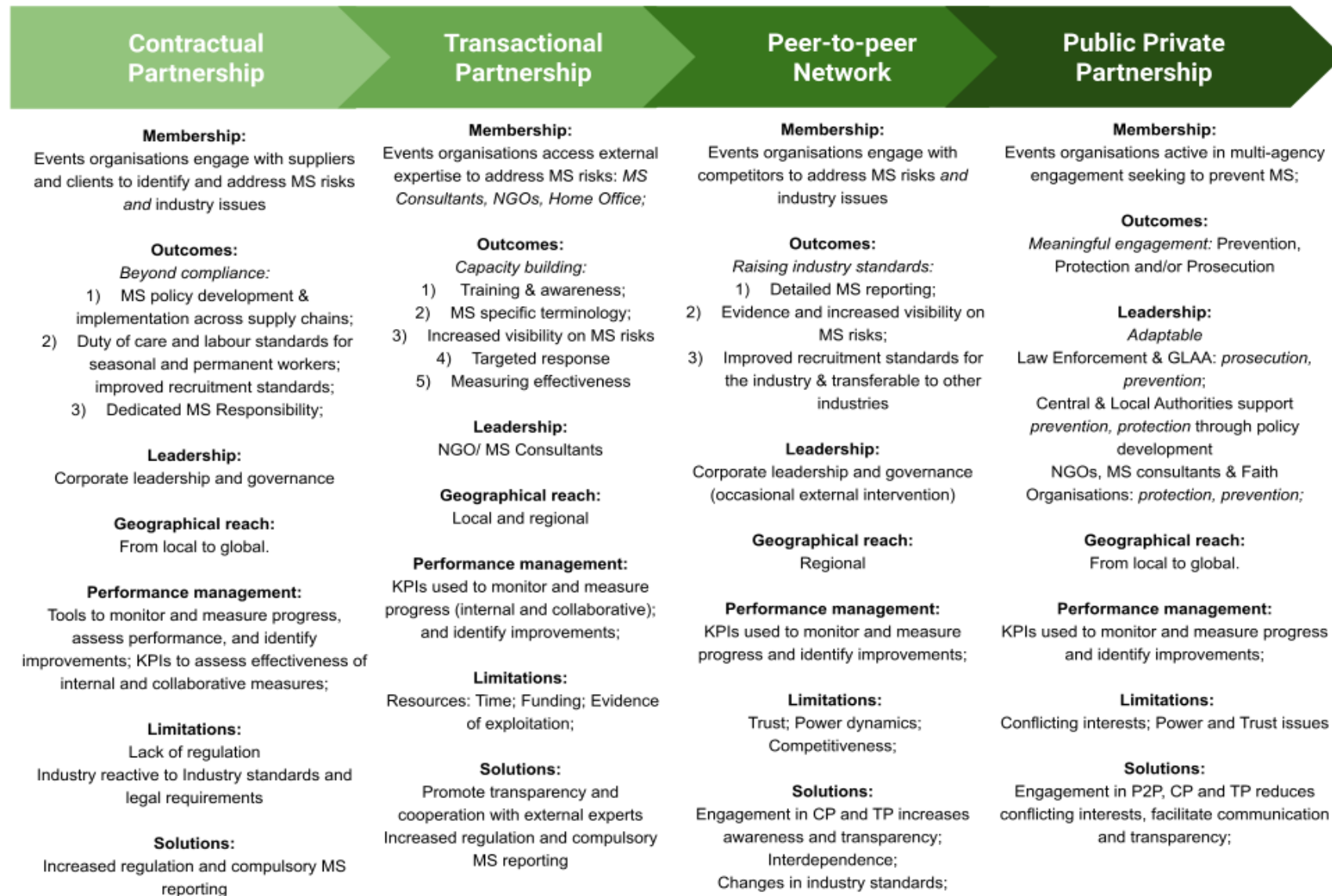


Figure 9.1. A partnership continuum

10 Conclusion

In this concluding chapter, I summarise the key findings resulting from the Labovian Model of Narrative Analysis, and I reflect on the research aim and objectives reiterated below. I then present the academic, methodological, and practical contributions to knowledge which include recommendations for policy makers, industry stakeholders, and NGOs; finally, I reflect on the limitations of the thesis and suggest future directions of research on MS in business environments.

10.1 Key findings evidencing actors' perspectives

The narrative analysis has revealed five narratives that underlie the perspective of external and internal stakeholders: a *risk focused* and a *people focused* narrative originated from the analysis of MSS presented in *Chapter 5*; while interviews with key actors evidenced three narratives focused on *compliance*, *collaboration* and *action* detailed in *Chapters 6, 7, and 8* respectively. The narratives present the collective and individual accounts and experiences of different categories of stakeholders, internal and external to events organisations. The narratives illustrate how distinct interpretations of MS lead to contrasting perspectives on industry implications, and subsequently distinct rationale for action, and nuanced understanding of the role of partnerships.

The narratives evidenced contrasting perspectives and several inconsistencies in the experiences of stakeholders on the partnership front. These distinct interpretations and inconsistencies, discussed in *Chapter 9*, indicated four approaches to partnership development: *contractual partnership* refers to partnerships with clients and suppliers introduced in the people focused, risk focused, and compliance narratives; *transactional partnership* represents the partnerships with NGOs, MS consultants and the Home Office supported by the compliance, collaboration, and people focused narratives; *peer-to-peer networks* (or industry networks) are partnerships with competitors and other industry actors supported by the collaboration narrative; finally, *public private partnership* refers to multi-agency engagement that includes industry actors and is supported by the action and collaboration narratives. This research found the following:

- a. *Partnerships against MS are not consistently understood and defined* by the different categories of stakeholders. Stakeholders have a proactive, reactive, or reluctant attitude towards engagement in partnership, informed by their definition of MS implications for the industry. Rationale for engaging in prevention and partnerships against MS is rooted in stakeholders' conceptualisation of MS, their understanding of MS risks, and their views of other stakeholders.
- b. *Most industry stakeholders lack awareness of the complex risks associated with MS* and their implications, especially surrounding labour exploitation. The risks of MS are generally contextualised as industry issues, prevention is understood as duty of care, and risks of labour exploitation are framed as employment and recruitment issues by most internal stakeholders. This is evidenced in the language and terminology used by industry stakeholders and by external actors engaging in translating MS and attempting to 'speak the same language as businesses'. This means that MS discourse

is replaced by CSR and HRM discourse not only by industry stakeholders who lack awareness but also by external actors who need to adapt in order to engage the industry. This reveals a communication compromise which facilitates collaboration but carries the negative consequences of perpetuating a lack of awareness. Scholarship advocates for use of appropriate terminology and education, especially for industries facing higher risk of exploitation (Donohue-Dioh et al., 2020; Yea and Chok, 2018).

- c. *A vague definition of MS risk leads to untargeted responses and lack of dedicated MS responsibility:* MS reporting indicates that responsibility for MS is distributed across events companies and suppliers, whereby different stakeholders hold different roles against MS at group, regional and local level. However, there is no evidence of such responsibility embedded in any of the organisations research participants were working for at the time of the interview or before it. Still there is a belief that event stakeholders could adopt some MS attributions although how this would influence their practices remains unclear and lacks consensus for internal and external actors: whether this should be embedded onto existing roles, such as Human Resources, CSR or Procurement (similarly to what is pledged in the MSS), versus creating new roles dedicated to MS prevention such as: MS Champion, MS Compliance Officer within different internal departments. This leads to a conversation on MS being perceived as an 'auxiliary responsibility'.
- d. *Industry stakeholders' priorities are not consistent with those of other stakeholders engaged in partnerships.* Most industry stakeholders exhibited reluctance to engage in any collaborations that would not benefit them, be they P2P or PPPs. This is observed both in individuals and organisations' response to MS (interviews and MSS). While this is consistent with literature on organisations collaborating to achieve or maintain a competitive advantage (Powell, 1987; Mohr and Spekman, 1994), it poses a significant limitation for actors seeking to engage with businesses in PPP or P2P partnerships. Unwillingness to engage in partnership and even to acknowledge the implications of MS has been criticised by other study participants who believe that those who lack awareness do so because of their unwillingness to become aware.
- e. *Identifying the most prevalent type of exploitation leads to inconsistency* in the accounts of participants: internal and external stakeholders including, MS consultants, Law Enforcement, Local Authority, and NGO representatives, and labour providers, identify labour exploitation as the most prevalent threat associated with MS faced by workers in events and hospitality organisations. They criticise the industry's efforts to prioritise sexual prevention instead of labour. However, when attempting to collaborate with industry stakeholders they discuss examples of sexual exploitation, thus contributing to the misconception surrounding the prevalence of sexual exploitation in the industry.
- f. *Subcontracted workers, many of whom are migrants and students, have restricted mobility* which poses difficulties to changing jobs or securing permanent employment. Seasonal staff (on temporary, zero-hour contracts) are not within the scope of organisations' ethical compliance framed as duty of care which only applies to permanent workers. Labour providers view it as the responsibility of their clients to ensure seasonal staff wellbeing, while internal HR managers and directors view it as the responsibility of the agency to look after 'their staff'. Seasonal workers' mobility is

constrained by non-compete clauses. This means that they are unable to secure permanent employment with clients or competitors of their contractual agency unless they spend 3-6 months working outside the industry.

- g. *The use of digital recruitment and staff management platforms poses additional concerns for labour practises in the sector:* Reliance on IT platforms for recruitment, training, payment and staff management is a surprising finding. Findings show that IT platforms limit recruiters' capacity to engage with staff and render seasonal workers to 'a name on the screen' as one labour provider puts it. Practitioners and policy makers engaged in trafficking and forced labour prevention as well as ethical labour providers share concerns for current recruitment practices and the increased reliance on digital platforms which enhance migrant workers' vulnerability. To address the risks of trafficking and forced labour, Public Private Partnerships (PPPs) are beginning to emerge as a practical strategy seeking to prevent forced labour and labour abuse in the construction, agriculture, retail and apparel sectors where digitalisation of recruitment intersects with reliance on temporary and seasonal migrant labour that create conditions for exploitation (Phung and Crane, 2018; Richards, 2004). The GLAA provides an industry profile for events which shows that many victims in the sector are recruited using internet adverts and via social media through friends and family. In addition, an increasing number of labour providers rely on digital platforms to recruit and manage shifts and payments for seasonal workers.
- h. *Barriers to partnership development and partnership engagement are identified. Conflicting interests* are the main impediment to meaningful collaborations. this leads to an array of additional limitations: *lack of awareness and lack of evidence* are linked to the developing stages of partnerships; while *performance management, lack of communication and lack of transparency leading to inconsistency, limited coordination, commitment and contribution issues, trust and power issues* impede the engagement of stakeholders in most types of partnership whether contractual, transactional, peer-to-peer networks, public private partnerships. These barriers are specific to partnerships that include the industry stakeholders.
- i. This research brings in new findings about the *different approaches to partnerships leading to a continuum of partnership engagement*. These approaches are uncovered by combining multidisciplinary streams of partnership research and theory into a conceptual framework. The *partnership continuum* is a roadmap to meaningful partnership engagement to address MS. It is informed by current practices in the industry and in business. The approaches to partnership are integrated to enable industry stakeholders to overcome barriers and engage in a capacity known to them by gradually joining other types of engagement. A partnership continuum supports the development of collaborations and interventions that enable events sector organisations to engage with peers and external actors in addressing MS.

10.2 Research Aim and Objectives

This research aimed to evaluate the role partnerships can play in addressing MS from the perspectives of stakeholders in the UK event sector. This research uncovers that partnerships are not consistently understood by the internal and external event sector stakeholders

engaged in this research. They are seen as solutions, opportunities, or relationships and partnership engagement is regarded proactively, reactively, and even with reluctance by different actors. This leads to multiple approaches to partnership to address MS and labour practices in the industry. Therefore, this research argues that the road to meaningful partnership engagement to address MS takes the shape of a *partnership continuum* where industry stakeholders begin to engage in a capacity known to them and gradually join other types of engagement. A partnership continuum would support the development of collaborations and interventions that enable events sector organisations to engage with peers and external actors in addressing MS.

The following objectives were met in the course of this research:

1. Scholarship on MS in business enabled me to identify the underlying issues of MS in business environments and the mechanisms to address it. I explored implications of MS risks and how these are interpreted in a business context by looking at scholarship on translation. I explored the implications of MS in business and the empirical evidence on supply chains considering the legal and regulatory perspective as well as businesses' responses to regulations. Moreover, I examined evidence of exploitative practices in the event sector along with labour and human rights issues.
2. I critically reviewed multidisciplinary scholarship on partnerships that address MS and other complex issues, while acknowledging that extant research seldom explores the role of businesses in such collaborations. Additionally, I reviewed studies concerning partnerships that include businesses predominantly focused on corporate interests, profitability, and competitive advantages. This enabled me to theorise distinct approaches to partnership and to include them in the conceptual framework.
3. I identified two mainstream theories (Partnership and Stakeholder Theory) used in organisational studies and partnership research. I critically evaluate the relevance of these theories in relation to the research aim. This led me to developing a conceptual framework through which I analysed stakeholders' perspectives and responses to MS.
4. I analysed information available in the public domain reported by events companies about their responses to MS. MSS revealed distinct responses and the analysis informed the reconstruction of two narratives focused on risks and people.
5. The analysis of MSS enabled me to map stakeholders engaged in addressing MS in the UK events sector. This led me to refining the conceptual framework and to analysing key stakeholders' perspectives on partnerships to address MS and their rationale using a narrative approach. The analysis informed the reconstruction of three additional narratives focused on compliance, collaboration and action.
6. I drew conclusions about the role of partnership in addressing MS in the event sector. guided by four research questions relating to the *role of partnership in addressing MS*, *the rationale for partnership*, the extent to which industry stakeholders were *prepared to engage in partnerships*, and the *formation of a partnership against MS for event sector stakeholders*. This research argued that the industry is not prepared to engage in partnerships against MS with (some) external actors. Partnerships to address MS are currently ineffective in events because many stakeholders lack awareness of the implications of MS but also due to a lack of trust, common interests, and inconsistent

priorities. Therefore, in lieu of a predetermined partnership approach, this research theorised the need for adaptability which takes the form of a partnership continuum as the road to meaningful partnership engagement.

10.3 Contribution to knowledge

10.3.1 *Academic Contributions*

This research project examines different categories of stakeholders and evaluates their perspectives on the meaning of partnership, while also responding to calls for industry specific research on MS in business (Bales, et al. 2015; Weitzer, 2014). The academic contribution to knowledge is twofold; firstly, advanced integration of stakeholder and partnership theories was achieved by reviewing and combining the two theories into a conceptual framework through which MS reporting and the perspectives of stakeholders are evaluated. The two theories have not previously been applied in the context of MS in the field of events. Partnership theory is used to explore the purposes, membership, and outcomes of collaborations that address MS in the events sector, while recognising that players have distinct interests and different levels of commitment (McQuaid, 2000; Hatton and Schroeder, 2007; Powell, 1987; Mohr and Spekman, 1994). Stakeholder theory is brought in to explore how different categories of stakeholders (e.g., internal/external stakeholders) perceive MS risks, their rationale for action in addressing MS, and engaging in partnership (Freeman et al, 2018; Donaldson and Preston, 1995).

The Conceptual Framework was employed as a foundation for this empirical research in evaluating the role partnerships play in addressing MS from the perspectives of stakeholders in the UK event sector. I used it in the analysis to map and evaluate stakeholders' engagement in partnerships against MS in the UK events sector. Furthermore, it enabled me to theorise partnership dynamics and the rationale for partnerships to address MS in the event sector (Hatton and Schroeder, 2007); the framework depicts the relationships between the key concepts that emerged: *Membership, Leadership, Approach, Outcomes, and Geographical reach*. Furthermore, it evidences *barriers to partnership development* drawn from partnership research and theoretical framing along with *industry characteristics* discussed in the literature review. Findings lead to obtaining a fuller understanding of stakeholders' perspectives on MS and partnership engagement.

Secondly, the findings provide new perspectives on partnerships by evidencing fundamental misunderstandings about their purposes in addressing MS in the event sector. While the notion of MS responsibility is disputed and misunderstood by actors in the event sector. It evidences distinct interpretations of MS and several inconsistencies in the experiences and perspectives of stakeholders on the partnership front which inform four approaches to partnership development: *contractual, transactional, peer-to-peer, and public private partnerships*.

10.3.2 *Methodological Contribution*

Employing narrative analysis is a novel analytical method to evaluate the role partnerships play in addressing MS from the perspectives of stakeholders in the UK event sector. Specifically, the Labovian Model leads me to the development of five distinct narratives focusing on *risks, people, compliance, collaboration, and action*, by analysing primary data

sets originating from organisations and individuals. The narratives evidence differences in key actors' perspectives concerning the definition of MS which informs their rationale for action and their engagement in partnership. Narrative analysis enables a deeper understanding of the event sector's understanding of labour and sexual exploitation risks (within companies' direct operations and supply chains) many of which could not be distinguished from industry issues, framed using CSR and HRM discourse.

10.3.3 *Practical Contributions*

On a practical level the findings inform industry collaboration and partnership development to address MS in the event sector, by identifying four approaches to partnership in the event sector: *contractual*, *transactional*, *peer-to-peer*, and *public private partnerships*. This leads to the development of a *Partnership Continuum*, which could support the development of partnerships and interventions that enable events sector organisations to collaborate with peers, NGOs, law-enforcement agencies, and policy makers in addressing MS. The Partnership Continuum could enable industry stakeholders to move beyond compliance, by working with external actors to build capacity, raise industry standards, and move towards meaningful partnership engagement. Each stage enables industry stakeholders to improve their practices by developing tools that aim to address current barriers.

In addition, I provide several recommendations for policy developers, industry stakeholders, educators, and for third sector organisations engaging in collaboration as follows:

Policy Recommendations:

Firstly, the government must acknowledge the need for amendments to the current *Section 54 of the Modern Slavery Act 2015*. Research into MS reporting from other fields (BHRRC, 2019; Nolan and Bott, 2018; Stevenson and Cole, 2018; Wen, 2016) and findings from this study highlight the need for more robust legislation that *mandates reporting* and *lowers the threshold* currently directed at organisations with a total turnover of at least £36m. The GDPR legal framework, which receives more attention from industry actors, can inform the amendments. While this poses logistical challenges for government agencies involved, the proposed recommendation would determine industry stakeholders to engage in more thorough risk mapping and reporting, given their compliance mindset and reactive approach to legislation and industry standards. Furthermore, mandatory reporting would generate funding from penalties imposed on those failing to produce satisfactory reports, which would provide supplementary funding to agencies engaged in tackling MS.

Secondly, the TiSC Guidance (HM Government, 2021), which currently informs a large extent of the reporting requirements for the industry (whether purchased from insurance providers or developed internally), should be embedded in the compliance requirements. The Guideline stipulates recommendations for companies to increase transparency of reporting, and while it is currently used in the structural development of Modern Slavery Statements, it fails to inform the quality of reporting. By making the TiSC Guidance part of the compliance requirements of *mandatory MS reporting* companies would need to ensure the content reported is accurate and consistent with their practices. This can lead to increased awareness, and it would empower organisations to identify and mitigate risks, whilst offering the best possible support to those engaged in MS reporting. The TiSC Guidance can be incorporated into Section 54, as a supplementary tool in supporting reporting against MS.

Thirdly, MS reporting must *acknowledge the specific implications of labour exploitation* for the internal operation and supply chain due diligence. Given the extensive reliance on subcontracted workers across the UK in a variety of sectors, this would determine companies to risk map and identify specific MS risks, it would promote use of accurate terminology, leading to more accurate reporting and increased awareness.

Finally, external regulations are needed for the agency sector to ensure subcontracted workers' rights are not overseen by labour providers or their clients. This study stresses the importance of attributing responsibility to *both* companies that use outsourced labour *and* labour providers, so that both have an interest and a role in mitigating exploitation from happening in the first place. Current practices overlook the wellbeing, labour, and human rights of subcontracted workers, many of whom are migrant workers facing additional employment issues and exposure to exploitation. Given the reactive stance of the industry to legal requirements, increased regulation would lead to improved working conditions, labour rights, and duty of care for subcontracted workers.

Third Sector Recommendation:

NGOs and MS consultants should lead Partnerships with private sector organisations from events and other industries. Currently, a large extent of Transactional Partnerships are developed and managed based on the interests of the industry stakeholders rooted in legal compliance and industry standards. This means that often engagement is disrupted once organisations secure policies, training, and risk mapping strategies that suit their needs, rendering external actors unable to measure the effectiveness of strategies or gather evidence of exploitative practices uncovered. A potential suggestion offered by research participants is that NGOs should charge companies for the services provided; this would lead businesses to see the relationship as an investment. Evidence from this research shows that many industry stakeholders take the collaborations with NGOs and consultants more seriously when charged for the services.

Recommendation for Higher Education

Programmes of study in Hospitality and Events, Business Management, Human Resource Management, and Supply Chain Management should include learning outcomes developed from extant and emerging MS research in Business. This would contribute to developing students' awareness about the implications of MS for businesses in the sectors they are planning to join, and the risk of labour exploitation associated with subcontracting. This would not only empower them to identify cases of exploitation, as many students are employed in the agency sector, but also to develop accurate language and terminology to articulate the implications of MS.

Recommendations for Event Organisations

Events organisations and their suppliers need to demonstrate consistent and clear corporate leadership to their suppliers, employees (internal and subcontracted), and peers. Based on the findings, the recommendations for events organisations are threefold and relate to specific actions including: (1) *developing and implementing dedicated MS policies*; (2) embed MS responsibilities across operational functions by *attributing dedicated MS responsibility to internal actors* vested with power to affect internal change (MS Champion, MS Officer); they would act as a point of contact for internal staff, liaison between departments to ensure

consistency, and manage external engagement, therefore it is vital that they have power to implement changes in different departments; and (3) *developing performance management tools* to assess how well industry actors perform against their goals; this tool would improve the level of transparency in corporate reporting and P2P/PPP engagement.

10.4 Limitations and future research

In this final section of the thesis, I acknowledge methodological limitations, and provide suggestions for future research that may contribute to ongoing debates concerning the intersection of MS in business with partnership.

10.4.1 *Research Limitations and Reflections*

Core limitations for this study pertain to the methodology underpinning this study. Although this methodology enabled me to gain an in-depth understanding of the complex actions taken by stakeholders in addressing MS in the UK events sector, through the review of primary data sources, the implications of methodological challenges in the context of this study are threefold.

Firstly, access to industry stakeholders poses a potential limitation to this study particularly in relation to trust and willingness. As mentioned in the methodology chapter, industry participants represent a third of all interviewees, even though a large extent of participants' recruitment efforts were for industry actors. Participants' unwillingness to discuss MS raised concerns over industry actors' priorities and perspectives to also engage in prevention and partnership to address MS, which is still an underexplored arena of MS in business and in particular to events and hospitality. Difficulties in access and recruitment are not uncommon in a demographic group that is underrepresented in social science research (Deane et al, 2019). The issue is particularly pronounced when the research topic is sensitive or potentially politicised (Conti et al, 2007). Although the industry's unwillingness to engage in prevention and partnership was not particularly surprising to many external actors experienced in MS prevention and partnership, I found it both surprising and concerning. Taking a reflective stance allowed me to see that my naive assumptions that businesses would be eager to understand and address any risks associated with MS in their operations and supply chains, especially when freely available to them, was a limitation in itself. During this research, I began to understand the complexity of any human and labour rights issues posed for commercial organisations and how difficult it may be to embed responsibility internally or even to acknowledge it. This is a key point of reflection acknowledged in the methodology and considered throughout the study, yet interpreting it poses challenges beyond participants' reflections on the industry. However, I may not be alone in holding this naive view about the industry, and this could pose a barrier especially to external stakeholders, who lack familiarity with business characteristics.

A second methodological limitation relates to the study design, sampling, and implicit analysis. I structured the study into two distinct stages: 1) a document analysis of MSS sourced from the Modern Slavery Registry (BHRRC, 2019) and UK events companies followed by 2) semi-structured stakeholder interviews. The two core stages of data collection and analysis are interlinked: data from events organisations and suppliers in the form of MSS informed participant recruitment and the conversation schedule. However, given the aforementioned

participant recruitment challenges there was a need to extend access beyond the targeted organisations (Denzin and Lincoln, 2011; Creswell, 2018). Therefore, it is important to acknowledge that recruiting research participants exclusively from the 21 events organisations and suppliers the analysed MSS originated from may have led to different results. This also uncovers a limitation to explore the meaning-making of industry actors involved in the production of MSS.

A third limitation concerns the data collection tools of the study. I opted for interviews as the most suitable tool in qualitative research (Saunders et al, 2019; Polkinghorne 2005) for in-depth exploration of the role partnerships can play in addressing MS from the perspectives of stakeholders in the UK event sector (Yanow, 2015). The aim of stakeholder interviews was to examine participants' perspectives on partnerships to address MS and their rationale for those partnerships by exploring the type of partnerships they were involved in or sought to develop, their reasons to organise in such partnerships, and the processes they followed. Although this enabled me to draw conclusions about the role of partnership to address MS from the perspectives of stakeholders in events, focus groups could have further informed the dynamics of different categories of stakeholders. Focus groups would enrich the socially constructed nature of the phenomenon where stories play a role in the ways individuals as well as companies construct reality by exploring the engagement and dynamics between participants (Plummer, 1995; Czarniawska, 2004). However, in the context of this study where trust and willingness posed serious challenges concerning industry stakeholders' engagement, extending the study would have further constrained internal actors as well as the timeline of this study.

10.4.2 *Directions for Future Research*

This research has provided an investigation into the role of partnerships in addressing MS in the event sector, focusing on key actors' knowledge, experiences, and barriers faced when engaging in partnerships. While these areas have been discussed in detail, some gaps in the knowledge have been underlined by findings in this study. These gaps along with suggestions for future research are outlined in the final section of the thesis.

The first area of consideration is the role of technology in recruitment and future of work. Findings of this research indicate that the use of digital recruitment and staff management platforms poses additional concerns for labour practises in the sector. Participants engaged in this research share concerns for current recruitment practices and the increased reliance on digital platforms which enhance migrant workers' vulnerability. Reliance on IT platforms for recruitment, training, payment and staff management was an unexpected finding in the context of this study; this is an area that requires further research particularly as it informs the future of work in the event sector and beyond in the sharing economy. However, how and where labour providers are recruiting from, and what measures are taken to prevent labour exploitation remains unknown. Without further data focusing explicitly on recruitment and employment practises this was difficult to effectively investigate within the context of this study. Conducting further research could inform the processes event and hospitality organisations and their labour providers use in the recruitment and staff management platforms, through the review of qualitative and quantitative data sources. This research would enhance the debate on human trafficking, forced labour, and debt bondage in relation to the use of recruitment practices and technology in a business context. The findings would advance knowledge on

the implications of digital recruitment leading to labour exploitation and could inform the processes labour providers use in the recruitment and staff management platforms. On a practical level the findings could inform practice and policy and provide critical insight into improving the recruitment practices in the industry of hospitality and other sectors reliant on outsourced migrant labour.

Another area of future research concerns the experiences of individuals working in events on seasonal contracts. This thesis focused on senior actors in events who could inform partnership engagement and evidenced their conceptualisation of MS while evidencing the implications of lack of duty of care towards subcontracted workers; future research focusing on modern slavery in events could be conducted from the perspective of subcontracted workers in events, many of whom are migrants and students. This would be achieved by conducting interviews with seasonal workers and students employed by labour agencies on temporary and zero-hour contracts. This is a logical follow up, as currently, only the views of the practitioners and senior managers are explored. Investigating seasonal workers' accounts of their journeys would advance understanding of their experience and would inform the practical means to support them in the future. Furthermore, this would help evidence the nuances between labour exploitation, restricted mobility, and 'unfreedom' (LeBaron, 2018; Yea and Chok, 2018), to empower subcontracted workers and involve them in decisions concerning their employment, leading to 'decent work' (Skrivankova, 2010). Finally, to address the sampling limitation acknowledged above, future research ought to explore the perspectives of participants embedded in organisations that produce MSSs available for analysis to explore the meaning-making and identity of those involved in producing the statements.

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Appendices

Appendix 1. Transfer Approval



13 July 2020

Dear Ms Macaveiu

Transfer of registration from MPhil to PhD

I am pleased to inform you that, following consideration of your application for transfer, the Research Degrees Committee has approved the transfer of your registration from Master of Philosophy to Doctor of Philosophy.

Yours sincerely

A handwritten signature in black ink, appearing to be "T Crook", written over a horizontal line.

Dr T Crook

cc: Dr R Hawkins, OBBS
Dr S Goethals, OBBS
Dr D Bowen, OBBS, Postgraduate Research Tutor

Humanities, Environment & Social Sciences Sub-Committee
Chair: Dr T Crook, BA MA PhD
Jill Organ (Secretary)
John Henry Brookes Building Gipsy Lane Oxford OX3 0BP UK
t. +44 (0) 1865 484244
jorgan@brookes.ac.uk www.brookes.ac.uk

www.brookes.ac.uk

Appendix 2. Ethics Approval



Dr Rebecca Hawkins
Director of Studies
Oxford Brookes Business School
Oxford Brookes University

7th November 2019

Dear Dr Hawkins,

UREC Registration No: 191344

An investigation of partnership development and collaborations against modern slavery in the UK event sector

Thank you for your email of 5th November 2019 outlining your response to the points raised in my previous conditional approval letter about the PhD study of your research student, Claudia Macaveiu, and attaching the revised documents. I am pleased to inform you that, on this basis, UREC is happy to grant full approval for this study.

The UREC approval period for the data collection phase of the study is two years from the date of this letter, so until 7th November 2021. If you need the approval to be extended please do contact me nearer the time of expiry.

Should the recruitment, methodology or data storage change from your original plans, or should any study participants experience adverse physical, psychological, social, legal or economic effects from the research, please inform me with full details as soon as possible.

Yours sincerely

A handwritten signature in blue ink, appearing to read "S Quinton", with a stylized flourish at the end.

Dr Sarah Quinton
Chair of the University Research Ethics Committee

cc: Dr Samantha Goethals, Supervisory Team
Claudia Macaveiu, Research Student
Dr Karen Handley, Research Ethics Officer
Jill Organ, Research Degrees Team

Appendix 3.1. Research Notice

Research Notice - Doctoral research involving interviews with stakeholders in the event sector



Study title: *The role of Partnerships in addressing Modern Slavery in the UK Event Sector*

What is the research about?

I am researching the role of partnerships to address modern slavery in the UK event sector. The interview provides an opportunity for participants to share their expertise and contribute to improving existing practices in the sector.

What will you be asked to do?

The field work of my research project consists of interviews with key stakeholders in the field of events. The interviews, which will take up to one hour of your time, are scheduled to take place between October 2019 and June 2020. Up to 30 representatives will be invited to participate from the following audiences: decision makers and recruitment managers, regulatory bodies, local authority/municipality, licensing authorities, police, MPs and NGO representatives. During interviews, I intend to explore the following questions: *what prevention strategies do stakeholders believe to be most important, and why? What kind of collaborative initiatives are they involved in, or seek to develop? What kind of processes do they follow? How partnerships between businesses and other organisations with an interest in preventing modern slavery could work? How could such partnerships be developed and sustained?* With participants' permission, the interviews will be audio recorded and later on transcribed. Confidentiality, privacy and anonymity will be ensured to all participants in the collection, storage and publication of research material. Data collected for this research project will be de-identified, aggregated and processed (no one but myself will know the identity of participants and what was said during the interview). Quotations will only be used with the participants' permission in which case pseudonyms will be attributed to ensure anonymity.

What will the outcome of your participation be?

The findings will be analysed and used to provide insight into how and why different stakeholders organise into collaborative partnerships to prevent modern slavery in the UK event sector. A copy of the findings will be made available to you to give you the opportunity to reflect on the data. My aim is to investigate the role of partnership in addressing modern slavery in the field of events, which may be transferable to other industries. The findings will help to support the development of partnerships and interventions that coordinate the efforts of events sector organisations, law-enforcement agencies, NGOs and policy makers in fighting modern slavery by sharing intelligence, training staff and raising awareness within communities.

How can you get involved?

Please contact me on the email address listed below to participate or if you have any questions regarding my research project. I am happy to address any questions or concerns you may have. This research has been approved by the Oxford Brookes University Ethics Committee.

Claudia Macaveiu

PhD Candidate

Oxford Brookes University

Business School

E: c.macaveiu@brookes.ac.uk

Appendix 3.2. Participant Information Sheet



Study title: The role of Partnerships in addressing Modern Slavery in the UK Event Sector

You are being invited to take part in a research study. Before you decide whether or not to take part, it is important for you to understand why the research is being done and what it will involve. Please take time to read the following information carefully.

What is the purpose of the study?

This research aims to advance understanding on the role partnership can play in addressing modern slavery in the UK event sector. It will assess the implications of such partnerships and it will help to support the development of partnerships and interventions that coordinate the efforts of events sector organisations, law-enforcement agencies, NGOs and policy makers in fighting modern slavery by sharing intelligence, training staff and raising awareness within communities.

Why have I been invited to participate?

I am inviting a range of people who are engaged in the event sector and/or modern slavery organisations to participate in semi-structured interviews. You have been invited to participate because you work in the events sector/are engaged in an NGO that seeks to prevent modern slavery/have been active in the area of modern slavery. Within these interviews, I would like to explore your views: on how partnerships between event sector businesses and organisations with an interest in preventing modern slavery could work, the reasons that such partnerships could be beneficial, how such partnerships could be developed and sustained. The study will take place between October 2019 and June 2020. The aim of the study is to conduct semi-structured interviews with participants to: (1) examine the type of partnerships stakeholders are involved in or seek to develop, (2) their reasons to organise in such partnerships, (3) the processes they follow, and (4) their aims. As this research focuses on partnership development, for data protection reasons I will NOT be asking for information about victims of human trafficking or modern slavery. The findings will be analysed and used in writing my thesis for Oxford Brookes University.

Do I have to take part?

The study is based on voluntary participation. It is up to you to decide whether or not you wish to take part in this research study. If you do decide to participate you will be given this information sheet along with a privacy notice that will explain how your data will be collected and used and be asked to give your consent. If you decide to take part you are still free to withdraw at any time and without giving a reason.

What will happen to me if I take part?

You are invited to participate in an interview which is estimated to take between 45 minutes and 1 hour. During the interview you will be asked to share your views on the role of partnerships against modern slavery. The interview will be arranged at a location, date and time of your convenience. With your permission, the interview will be audio recorded and later on transcribed. The first draft of the findings along with the good-practice framework will be made available to you. This will give you the opportunity to reflect on the findings – either over email or in a follow-up interview. Engaging in the follow-up interview of the findings is optional. At any point before, during and after the interview you can withdraw from the study.

What are the possible disadvantages and risks of taking part?

The interview is designed to take up to 1h. Should you feel uncomfortable at any point during the conversation, the interview can be stopped.

What are the possible benefits of taking part?

This study will provide insight into how and why different stakeholders organise into collaborative partnerships to prevent modern slavery in the UK event sector, and it is an opportunity for you to improve existent practices in the sector.

Will what I say in this study be kept confidential?

All the data and information collected about the individual participants will be kept strictly confidential (subject to legal limitations). Confidentiality, privacy and anonymity will be ensured in the collection, storage and publication of research material. Data collected for this research project will be de-identified (no one but the principal researcher will know who the participant is and what they said during the interview). As the data will be analysed by the principal researcher only, no one else will have access to the data until it has been aggregated and processed. All collected data (participants' names and organisations) will be anonymised; where appropriate, participants are advised to seek their line manager's approval before engaging in the research.

Research data will be kept securely at all times, especially during collection before being transferred to Oxford Brookes University. Laptops and other devices will be password protected whilst data files will be encrypted. Google Drive will be used for data storage, for which the University has a security agreement. Data generated by the study will be retained in accordance with the University's policy on Academic Integrity. Data generated in the course of the research will be kept securely in paper or electronic form for a period of ten years after the completion of the research project.

What should I do if I want to take part?

To take part in this research study please contact: Claudia Macaveiu (principal researcher), c.macaveiu@brookes.ac.uk

What will happen to the results of the research study?

The data and results from this study will be used in my PhD thesis at Oxford Brookes University and may be used for publications in academic journals. A summary of the findings of the study will be made available to each participant.

Who is organising and funding the research?

I am conducting this study as a research student at Oxford Brookes University. The research project is funded by Oxford Brookes Business School.

Who has reviewed the study?

The research has been approved by the University Research Ethics Committee, Oxford Brookes University (Reference 191344).

Contact for Further Information

If you need any further information regarding this research project or should you have any concerns please contact Claudia Macaveiu on c.macaveiu@brookes.ac.uk. If you have any concerns about the way in which the study has been conducted, please contact the Chair of the University Research Ethics Committee on ethics@brookes.ac.uk

Thank you

Research team contact details:

Principal researcher: Claudia Macaveiu (c.macaveiu@brookes.ac.uk)

Supervisory team: Dr Rebecca Hawkins (p0040008@brookes.ac.uk) and Dr Samentha Goethals (p0019957@brookes.ac.uk)

Appendix 3.3. Consent Form



CONSENT FORM

Full title of Project: The role of Partnerships in addressing Modern Slavery in the UK Event Sector

Please initial box

I confirm that I have read and understand the information sheet for the above study and have had the opportunity to ask questions.

I understand that my participation is voluntary and that I am free to withdraw at any time, without giving reason.

☐

I agree to take part in the above study.

☐

Please initial box

I understand that the interview will be audio-recorded

Yes

No

☐☐

I agree to the use of anonymised quotes in publications

☐☐

Please add your email address if you would like to receive a copy of the transcript for your records:

Name of Participant

Date

Signature

Name of Researcher

Date

Signature

Appendix 3.4. GDPR notice



Privacy Notice

Oxford Brookes University (OBU) will usually be the Data Controller of any data that you supply for this research. This means that we are responsible for looking after your information and using it properly. The exception to this is joint research projects where you would be informed on the participant information sheet as to the other partner institution or institutions. This means that they will make the decisions on how your data is used and for what reasons. You can contact the University's Information Management Team on 01865 485420 or email info.sec@brookes.ac.uk.

Why do we need your data?

This field work is a part of my research project which aims to advance understanding of the role partnership can play in addressing modern slavery in the UK event sector. It will assess the implications of such partnerships and it will help to support the development of partnerships and interventions that coordinate the efforts of events sector organisations, law-enforcement agencies, NGOs and policy makers in fighting modern slavery by sharing intelligence, training staff and raising awareness within communities. The field work consists of semi-structured interviews with key stakeholders in the field of events. It will take place between October 2019 and June 2020. During interviews, I intend to examine the type of partnerships stakeholders are involved in or seek to develop, their reasons to organise in such partnerships, the processes they follow, and their aims. Up to 30 key representatives will be invited to participate: decision makers and recruitment managers in events regulatory bodies, local authority/municipality, licensing authorities, police, MPs and NGO representatives. The findings will be analysed and used in writing my PhD thesis at Oxford Brookes University, and may be used for publications in academic journals.

OBUs legal basis for collecting this data is:

- You are consenting to providing it to us; and / or,
- Processing is necessary for the performance of a task in the public interest such as research

If the university asks you for sensitive data such as; racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, data concerning health or sexual life, genetic/biometric data or criminal records OBU will use these data because:

- You have given OBU explicit consent to do so; and / or
- Processing is necessary for scientific or research in the public interest.

What type of data will Oxford Brookes University use?

- Audio recordings of stakeholder interviews
- Field notes
- Transcripts of stakeholder interviews

Who will OBU share your data with?

All the data collected about the individual participants during interviews will be kept strictly confidential. Confidentiality, privacy and anonymity will be ensured in the collection, storage and publication of research material. Data collected for this research project will be de-identified (the identity of participants and what they said during the interview will only be known to the principal researcher). As the data will be analysed by the principal researcher only, no one else will have access to the data until it has been aggregated and processed. Research data will be kept securely at all times, especially when collected in the field before being transferred to Oxford Brookes University. Laptops and other devices will be password protected whilst data files will be encrypted. Google Drive will be used for data storage, for which the University has a security agreement.

Will OBU transfer my data outside of the UK?

No

What rights do I have regarding my data that OBU holds?

- You have the right to be informed about what data will be collected and how this will be used
- You have the right of access to your data
- You have the right to correct data if it is wrong
- You have the right to ask for your data to be deleted
- You have the right to restrict use of the data we hold about you
- You have the right to data portability
- You have the right to object to the university using your data
- You have rights in relation to using your data automated decision making and profiling.

Where did OBU source my data from?

Primary data will be sourced from participants during interviews. With participants' permission, the interviews will be audio recorded and later on transcribed. In addition stakeholder generated statements, CSR reports and other relevant documents will be sourced from the Modern Slavery Registry and UK events companies. These sources are publicly available, thus facilitating access

Are there any consequences of not providing the requested data?

There are no legal consequences of not providing data for this research. It is purely voluntary.

Will there be any automated decision making using my data?

There will be no use of automated decision making in scope of UK Data Protection and Privacy legislation."

How long will OBU keep your data?

In line with Oxford Brookes policies data generated in the course of research must be kept securely in paper or electronic form for a period of time in accordance with the research funder or University policy.

Who can I contact if I have concerns?

You can contact the Information Management team.

Postal Address: Information Management Team, IT Services, Room 2.12, Gibbs Building, Headington Campus, Gipsy Lane, Oxford, OX3 0BP

Email: info.sec@brookes.ac.uk

Tel: 01865 485420 in UK / +44 1865 485420 outside the UK.

Appendix 3.5.1. Participant recruitment message for internal stakeholders

LinkedIn message for events companies contacts

Dear [REDACTED],

Thank you for accepting my invitation to connect. I am a PhD researcher at Oxford Brookes University looking at collaborative partnerships to address modern slavery in the UK event sector. The reason I am contacting you is because the Modern Slavery Statement produced by [REDACTED] is a great model of good-practice and I believe your organisation has been committed to combat modern slavery for years. I would like to invite you to participate in an interview to discuss prevention strategies against modern slavery and collaborative initiatives. The interview will take up to one hour of your time. In addition to event sector stakeholders I am recruiting regulatory bodies, local authority/municipality, licensing authorities, and NGO representatives to discuss prevention strategies against modern slavery and collaborative initiatives.

Confidentiality, privacy and anonymity will be ensured in the collection, storage and publication of research material. After all interviews are completed a summary of the findings will be made available to you to give you an opportunity to reflect on the data.

If you, or someone in your organisation, would like to take the opportunity to share your expertise and contribute to improving existing practices in the industry please email me on c.macaveiu@brookes.ac.uk to discuss this in more detail. I am happy to address any questions or concerns you may have. This research has been approved by the Oxford Brookes University Ethics Committee.

Kind regards,

Claudia Macaveiu

c.macaveiu@brookes.ac.uk

#partnership #modernslavery #research

LinkedIn message for events groups

(1200 characters)

Hello everyone, I am a PhD researcher at Oxford Brookes University looking at collaborative partnerships to address modern slavery in the UK event sector. I am looking for recruitment and operations managers in the field of events to participate in a confidential interview to discuss prevention strategies against modern slavery and collaborative initiatives.

Up to 30 other representatives from the following audiences will also engage in the study: decision makers and recruitment managers in events, regulatory bodies, local authority, licensing authorities, police, and NGO representatives. Confidentiality, privacy and anonymity will be ensured in the collection, storage and publication of research material. After all interviews are completed a summary of the findings will be made available to you to give you an opportunity to reflect on the data.

If you would like to engage in the study (or if you know someone who would) please contact me on the email address listed below to discuss this in more detail. I am happy to address any questions or concerns you may have. This research has been approved by the Oxford Brookes University Ethics Committee.

Kind regards,

Claudia Macaveiu

c.macaveiu@brookes.ac.uk

#partnership #modernslavery #research

Appendix 3.5.2. Participant recruitment message for external stakeholders

Blanket email for external stakeholders

Dear [REDACTED],

I am a PhD candidate at Oxford Brookes University researching Partnerships to address modern slavery in the UK events and hospitality sectors. Your work against modern slavery and human trafficking has been a real model of good-practice for engaging businesses and local communities in the industry. The reason I am contacting you is to ask if someone within [REDACTED] might be interested in participating in the research project?

I am conducting interviews with stakeholders from organisations involved in addressing modern slavery, including: UK businesses, local authority/municipality, licensing authorities, and NGO representatives. The interview would not take more than one hour of your time and it is entirely anonymous - your name and your organisation would be redacted from the transcripts. Subsequently, I would be happy to share my findings with you. I have enclosed an information sheet with more details on my project, please do let me know if you have any questions?

If this is something the [REDACTED] might consider please let me know, your insight in the sector would be invaluable to my research.

I look forward to hearing from you.

With best regards,

Claudia Macaveiu

PhD Candidate

Oxford Brookes University

Appendix 4.1. Conversation schedule for internal stakeholders

Conversation schedule – internal stakeholders: decision makers and recruitment managers in events

Introduction

I am researching the role partnership can play in addressing modern slavery in the UK event sector. This research will assess the implications of such partnerships and it will help to support the development of partnerships and interventions that coordinate the efforts of events sector organisations, law-enforcement agencies, NGOs and policy makers in fighting modern slavery by sharing intelligence, training staff and raising awareness within communities.

The objective of this interview is to explore your views and experience in relation to partnerships against modern slavery and it should not take more than 1h. The points that will be discussed in the course of the interview relate to the risks of modern slavery, within the business and the supply chain, the prevention strategies and type of partnerships you are involved in or seek to develop. The findings will be analysed and used to provide critical insight into stakeholder collaboration and partnership development against modern slavery.

The questions below are related to the main topics that will be discussed. Based on the participants' answers and the direction of the conversations follow-up questions will be asked.

Part 1: Warm up questions

Tell me a bit about your role?

What do you like most about your role? What are the most challenging aspects of your role?

What does the term Modern Slavery bring to mind?

Are you familiar with the Modern Slavery Act of 2015? How has it impacted your role/ your organisation? Could you comment on the distinction between moral and legal liability to prevent modern slavery?

Part 2: Modern slavery in your field

Can you tell me about your views on modern slavery in hospitality in general? What about your field in particular?

Do you think it is something that the sector is generally knowledgeable about? In your role/ experience have you ever come across any issues related to modern slavery?

To your knowledge, what processes are in place to identify risks/ensure MS is not taking place? (In hospitality in general/in your field in particular).

Can you tell me of any specific risks associated with hospitality and events? Can you tell me about any specific strategies that you think are being implemented in your field in general to address the issue?

Do you think current initiatives designed to prevent modern slavery are effective for hospitality in general? What about your field? Can you tell me more? Do you think more could be done?

In your opinion what more could be done to reduce the risks of modern slavery in the supply chains of hospitality companies? What about events?

Part 3: Prevention strategies

What strategies to prevent do you believe to be most important and why? Are there specific example that you can give me? Which strategies were you aware of before today? Which do you believe to be most appropriate for hospitality in general/your field? What other strategies would you add to the list?

Can you give any examples of prevention strategies that you believe are working well? Do you think any sectors of the hospitality industry have adopted particularly strong approaches?

Who in the organisation is involved in preventing/ identify risks of modern slavery? What other key players (if any) do you believe can play an important role in prevention?

In your opinion, what roles could other stakeholders (both internal and external) play in preventing modern slavery?

How do you currently engage with individuals/organisations (aside from those in your own business) that seek to prevent modern slavery? How would you assess the success of these engagements? Alternatively what could be improved?

Part 4: Partnerships – engagement with stakeholders and partners against modern slavery

In your opinion, how important are partnerships in address modern slavery? How could partnerships be developed and sustained? What is the role of partnership in addressing modern slavery?

Are you currently engaged in/ seeking to engage in a partnership? Tell me about the collaborative actions against modern slavery (who you engage with; what form does the partnership take; who coordinates the initiative; what is it seeking to achieve; how does it do this).

In your view, how could partnerships be developed and sustained?

Based on your experience, who is best suited to coordinate partnership initiatives to prevent MS? And why?

Can you think of any successful examples of partnerships against modern slavery in the industry? Which would you say are the leading organisations in this regard?

Final question: If you could change one thing (in the legislation, policies, processes) to prevent modern slavery from taking place in the field of events what would that be?

Concluding the interview:

I appreciate the time you took for this interview. In summary, the main points that were discussed during the interview were (...). Is there anything else you would like to add in relation to the points we discussed? Moving forward, I will be transcribing the interview in the following x weeks and I will be able to send you a copy of the transcript for your records. Once I complete data analysis and the findings chapter is ready I can also send you a copy of it.

Thank you.

Appendix 4.2. Conversation schedule for external stakeholders

Conversation schedule – external stakeholders: regulatory bodies, local authority/municipality, licensing authorities, police, MPs, NGO representatives

Introduction

I am researching the role partnership can play in addressing modern slavery in the UK event sector. This research will assess the implications of such partnerships and it will help to support the development of partnerships and interventions that coordinate the efforts of events sector organisations, law-enforcement agencies, NGOs and policy makers in fighting modern slavery by sharing intelligence, training staff and raising awareness within communities.

The objective of this interview is to explore your views and experience in relation to partnerships against modern slavery and it should not take more than 1h. The points that will be discussed in the course of the interview relate to the risks of modern slavery, within the business and the supply chain, the prevention strategies and type of partnerships you are involved in or seek to develop. The findings will be analysed and used to provide critical insight into stakeholder collaboration and partnership development against modern slavery.

The questions below are related to the main topics that will be discussed. Based on the participants' answers and the direction of the conversations follow-up questions will be asked.

Part 1: Participant's background

Tell me a bit about your role?

What do you like most about your role? What are the most challenging aspects of your role?

What does the term Modern Slavery bring to mind?

Are you familiar with the Modern Slavery Act of 2015? How has it impacted your role/ your organisation? Could you comment on the distinction between moral and legal liability to prevent modern slavery?

Part 2: Modern slavery in the fields of hospitality and events

Can you tell me about your views on modern slavery in the hospitality and events sector? Do you think it is something that the sector is generally knowledgeable about?

To your knowledge, what processes are in place to identify risks/ensure MS is not taking place in the fields of hospitality and events?

Can you tell me about any specific strategies that you think are being implemented in the sector in general to address the issue?

Do you think current initiatives designed to prevent modern slavery are effective? Can you tell me more? Do you think more could be done?

In your opinion what more could be done to reduce the risks of modern slavery in the supply chains of events companies?

Part 3: Prevention strategies

What strategies to prevent do you believe to be most important and why? Which strategies are you most familiar with? Which prevention strategies do you believe to be most appropriate for the events and hospitality industry? What other strategies would you add to the list?

Can you give any examples of prevention strategies that you believe are working well, in hospitality in particular?

Who in the organisation is involved in preventing/ identify risks of modern slavery? What other key players (if any) do you believe can play an important role in prevention?

In your opinion, what roles could other stakeholders (both internal and external) play in preventing modern slavery?

How do you currently engage with individuals/organisations (aside from those in your own business) that seek to prevent modern slavery? How would you assess the success of these engagements? Alternatively what could be improved?

Part 4: Partnerships – engagement with stakeholders and partners against modern slavery

In your opinion, how important are partnerships in address modern slavery? How could partnerships be developed and sustained? What is the role of partnership in addressing modern slavery?

Are you currently engaged in/ seeking to engage in a partnership? Tell me about the collaborative actions against modern slavery (who you engage with; what form does the partnership take; who coordinates the initiative; what is it seeking to achieve; how does it do this).

In your view, how could partnerships be developed and sustained?

Based on your experience who is best suited to coordinate partnership initiatives to prevent modern slavery? And why?

Can you think of any successful examples of partnerships to address modern slavery in the industry (events and hospitality)? Which would you say are the leading organisations in this regard?

Final question: If you could change one thing (in the legislation, policies, processes) to prevent modern slavery from taking place in the field of events what would that be?

Concluding the interview:

I appreciate the time you took for this interview. In summary, the main points that were discussed during the interview were modern slavery in events and hospitality, prevention strategies and partnerships. Is there anything else you would like to add in relation to the points we discussed? Moving forward, I will be transcribing the interview in the following weeks and I will be able to send you a copy of the transcript for your records. Once I complete data analysis and the findings chapter is ready, I can also send you a summary of the findings.

Thank you.

Appendix 5. Interview Extracts and Coding Examples

	Extract 1 - MS implications for the industry	Coding
Time	Karla, HR Manager - Events Venue	
07:55	Interviewer In terms of modern slavery how do you think it applies to the hospitality sector?	
08:08	Karla Sure, ummm ... to be completely honest with you, I would not think that modern slavery would happen in the UK. I would consider this to happen in less developed countries. And to be completely honest, I would not think that it's something that would happen - definitely not in big hotel chains or big companies in general, maybe in smaller ones and but again I would not think that this is something that happens in the UK.	MS Definition MS in Business Denial & Awareness
08:59	Interviewer Why do you think it would not happen in the UK?	
09:02	Karla Simply because there are many laws, regulations on immigration from the Home Office and so I would not really think it's something applicable for the sector.. I would love to know actually, if you actually have come across situations that you know it would be an eye opener... Also ... ummmm, because before this hotel I used to work in the [mentions hotel name] a standard corporate hotel. And so of course it was a global chain, everything was very structured, you were given policies, procedures, everything from the top and all you needed to do is just tell people this is what we're going to do and implement them; where I am now, it's much more flexible you have to come up with that policy yourself.	Specific Risks Identification Moral and Legal Liability Motivation and Reasoning
09:52	Interviewer Can you tell me more about this flexibility and the type of policies?	
10:09	Karla ... well it's policies for people who often are not taught hoteliers... ummm people who have not worked in customer service before? We employ a very vast range of people, from like crazy - crazy in a positive way - personalities ... that love nightlife and loud music and are very social and have, I don't know, crazy hair, very funky glasses and everything like that... and then those who actually did go to hotel school and wear a suit and a tie and they love it like this. So this spectrum of personnel, it's massive, it's like I've never seen anywhere before, and I think this was the biggest challenge to implement and change your whole policy that would be easy for everybody to understand on the same level. Some people will take it more seriously. Some people will completely ignore it because they've never done it before, why should they do it now? So I think this was... this is the most difficult aspect.	HRM Policies & Processes Passion Flexibility Corporate interest
12:32	Interviewer I see, would you say that there were any differences to how any type of exploitation, or modern slavery in general, was viewed in your previous company compared to where you are now?	
12:55	Karla In the previous hotel where I worked, there was a zero tolerance policy, which included child abuse, prostitution, exploitation of people, and so on. So yes, that was in place and I remember having extensive training on that code of practice and things like that just to make sure that the front desk is aware of situations like this, where there are, you know, beautiful but maybe not properly dressed ladies coming into the hotel; who is picking them up? Where are they going? How come they know room numbers? And things like this. And yes we did that; however, in my current hotel that's not in place and it would be very difficult to implement; because we have a nightclub, and we have a very popular bar, we have a popular rooftop terrace, so for us to know who is visiting a bedroom and who is not, would be absolutely impossible; considering that the rooftop terrace, is like the rooftop so you do have to take the lift; so front desk would see you taking the lift but whether you go to the bar or to someone's bedroom... it would probably be impossible to follow every single person going up the stairs. So, yeah, definitely, like I say, probably the bigger hotel chains are much more structured and they do have policies in place; for us at the moment it would not work.	MS Policies & Processes Denial & Awareness Moral and Legal Liability MSA Reporting

	Extract 2 - Partnerships to address MS	Coding
Time	Claire, Local Authority - Risks and Exploitation Coordinator	
26:51	Interviewer Would you be able to tell me a bit more about your current engagement in partnerships?	
27:55	Claire So basically, local authorities have to have a Community Safety Partnership and the focus of that is around reducing crime and disorder within their area. It's made up of statutory agencies, local council, the police, we also have the fire service, voluntary services, we have local business representatives as well as members of the community. And that primarily focuses on work around all aspects of crime and disorder. It is quite powerful to have this as a body. And then we have the separate teams that coordinate different projects and essentially do the work.	Partnership approach Strategy & Priorities
28:44	Interviewer In your experience, who would you say is best suited to coordinate a partnership initiative?	
29:10	Claire I think we do have to have somebody whose role it is to look at that. So a dedicated modern slavery risk coordinator or officer. I know that my role doesn't really exist in other places. So I know in some of the neighboring boroughs they've been talking about modern slavery for really long time but it doesn't really sit anywhere ... no one has modern slavery as a responsibility attached to their role. So, they may not be as far ahead as we are. I'm sure that's not the only way to go, but it's literally my job to do that: coordination of different teams and to bring everybody together, and to know what I'm talking about so I think the secret is to have somebody whose specific role it is. If it just sits alongside some of their other responsibilities and it doesn't get as much attention.	MS responsibility Passion
29:53	Interviewer Just a quick follow-up to something you mentioned earlier, in terms of leadership which of the bodies you mentioned earlier would you say is best suited to coordinate such an initiative?	
30:19	Claire Well, if you're looking at something national that probably needs to be under the Police or National Crime Unit, that kind of thing. They tend to get a lot more buy-in and that's probably because they have those strategic connections in place at quite a high level with a number of different organisations. When you're looking at the local level – something that we've done that has worked really well – were awareness campaigns generally led by the Police and managed by the local authority. So having them on board tends to help, although they can't do it all themselves. The other thing I would say is when we've done the campaigns where the police were not necessarily involved in leading the campaign they have been instrumental; even things like getting shops to put a poster up, the best way of doing that involves literally taking the poster into the shop and asking them to put it up; and that worked a lot better when the police did it for us. So we got the police to visit the local shops and ask them to put the posters up – and that tends to lead to more posters put up in a shop.	Partnership Outcome Leadership & Power Strategy & Priorities Motivation and Reasoning
32:18	Interviewer Can you think of any successful examples of partnerships that include businesses?	
32:33	Claire I would say the Responsible Car Wash Scheme is a pretty good example because that was set up by the statutory enforcement agencies but also with GLAA, Police, Health and Safety Executive, HMRC, Environment agency, the Head of Retailer's Association, as well as Unseen the charity responsible for the Modern Slavery Helpline. Without legislation it's quite difficult, but I would say that as a national example it is pretty good.	Relationship building; Partnership approach Partnership Limitations MSA Criticism
33:53	Interviewer What about some local initiatives?	

34:03	Claire Some of the smaller operations we've got, where we went out and we actually visited car washes were really good, probably not the same level of engagement from businesses and charities but we had police involvement which helped; but that still has a long way to go being at a regional level. In Slough we do have a lot of financial exploitation. So people are not modern slavery victims per se – they can change their jobs, they can go somewhere else, so there is no element of coercion – but for a multitude of reasons they choose to stay in those under-paid jobs.	Partnership approach; Geographical reach MS Definition
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Appendix 6. Participant Pen Portrait Example

Karla, HR Manager - Events Venue

Role, type of organisation, and background. HR Manager (Employee Relations); has been with the company for 3Y and started as HR Assistant. Liaises with external staff as well as internal employees. Previous role as HR Advisor in charge of Recruitment and Training in a different hotel (their statement was analysed in stage one of research). Her current role is in a lifestyle hotel in Central London, franchisee from a large US group. Pre-pandemic, the events department organised regular private and corporate events and conferences with 200 to 250 attendees for clients like Google, Spotify, Amazon. Throughout the spring and summer they have weddings every weekend with similar numbers or fewer attendees. The events team operates within the Food and Beverage (F&B) department; she is unsure on the number of people in the team or the split between internal/outsourced workers as this is a departmental responsibility, although payments are managed by her department.

Awareness of MS. Prior to the interview, Karla believed MS to be an issue in developing countries - particularly in garment factories in SE Asia. When I ask about MSS and MSA she remembers her previous company having a zero tolerance policy on file and describes that hotel chain as a standard corporate hotel lacking flexibility, therefore 'it needed' to have all policies, whereas the current hotel is more 'flexible'. She speaks keenly about flexibility and how it enables the organisation to forge their own style. When I ask about company policies she explains that they are part of a US brand but were the only ones operating in the UK and given freedom to develop their own policies. Questions arise over a) the 'flexible' attitude in her current role and b) the lack of training concerning MS in her previous role. The MSS from her previous company implied that policies and training were in place for staff yet Karla is unaware of the risks and implications of MS. This contributes to the overall narrative that MS prevention and partnership engagement are driven by distant external factors and companies being reactive to external requirements/pressure to do so.

MS Prevention. There is no engagement in MS prevention. When asked about prevention she explains the recruitment process (for internal staff) and speaks of fair recruitment and training opportunities for all staff. Although she states multiple times that they (HR) care about all staff wellbeing, external staff are generally seen as the responsibility of their employers. When I ask, hypothetically, who would be in the best position to implement prevention mechanisms she speaks of her own role and the Hotel Operations Manager and the F&B Director (who is in charge of multiple events that require external staff). Finds it difficult to envisage their role (as a company) in prevention.

Industry Issues, Processes, and Solutions. When I ask about exploitation in the industry Karla hesitates often (marked with ellipses) and finishes many sentences with question inflection. She answers these questions by talking about policies to address issues that had occurred in previous role in relation to sexual exploitation, but the scenario she describes is prostitution. Mentions a zero tolerance to 'child abuse' in previous role when discussing MS. It is clear from the terminology and the hesitance in addressing those questions that she does not entirely understand MS and could not articulate scenarios that she felt were 'wrong'.

As the conversation progresses to the industry her tone and confidence change. Karla speaks with passion and enthusiasm about the industry and explains that she wanted to engage in the research project to help in any way she can improve the practices in the industry. Karla is somewhat naive (especially given her level of experience in HR) about labour standards in the industry and has multiple misconceptions relating to MS, prostitution, and child abuse. Similarly to *Amma*, *Emilia*, and *Holly* talks about potential *issues* in recruitment when asked about the threat MS poses to the industry. There are stark differences between internal staff recruitment and the flexible attitude to casual workers. For internal staff the hotel uses an online platform to recruit. They do a telephone interview with all staff and only conduct face to face interviews with more senior staff. No references are used - many of their staff are new to the industry. They focus on recruiting people with a passion for the industry and a 'vibrant character', experience is not necessary. She explained the importance of right to work checks and mentioned they want to recruit the 'right people' asked to explain and said they often receive applications from people who lack the right to work in the UK. New starters upload their bank and personal details on the system. HR needs to see a physical ID/passport for right to work checks but they only check this on the person's first day at training and induction. However on the online platform they need to 'tick' and confirm they had seen an ID much earlier because of a system glitch. Passport/ID are subsequently checked

by the line manager or HR on the first day. She did not see this as a risk opening them to exploitation.

External staff - they have a list of preferred staffing agencies but they are not 'very strict'. They have a contract in place for housekeeping (negotiated by procurement for a competitive rate) but all other external staff are brought in by department managers. They use apps, or new agencies advertised on the tube.

Couldn't provide any examples of staffing agencies and leaves it to the managers to choose how they staff their events/departments. Karla is unsure of the number of people brought in from agencies, but believes the majority of staff to be working via agencies. She describes having an approved labour provider and using them exclusively as an old-fashioned and outdated system that has been replaced by social networks and digital platforms used to recruit last minute external staff.

Using extensive numbers of outsourced staff raises occasional *issues* for the organisation. Communication is perceived as the solution to identifying issues but they do not take responsibility for external staff and any payment, or disciplinary issues need to be sorted by their agencies. The HR team have extensive training programmes for all staff; she stresses that they are 'very open and inclusive': external staff are welcome to attend training sessions and staff meetings, however she explains that agencies do not pay seasonal staff to attend training and this dissuades them from spending several hours every other month in training. HR does not interfere with agencies to negotiate training requirements on behalf of staff. All staff (internal and external) must attend statutory training (fire, health and safety) but professional development sessions are optional.

Questions arise over duty of care and responsibility towards seasonal staff - to be compared to accounts of labour providers (*Mark, Emilia and Amma*).

Understanding of partnership and implications for industry. There is no engagement in partnership and little interest in developing it. Karla is opposed to the idea of peer-to-peer partnerships because they have a 'unique' business model in the industry and believe they are different to competitors. I ask about potential relationships with external actors, to which Karla is unsure who they could partner with. She later reflects on the benefits of entering a partnership with HMRC. Partnerships are not seen as mutually beneficial or as a solution for reducing the risks of MS. Instead partnerships are seen as an opportunity for the company to learn/improve specific practices. This is very similar to *Amma, Emilia, and Holly*. Meanwhile *Richard, Nicole, and Andrew* condemn this attitude when discussing business engagement in partnership and see it as a barrier to meaningful partnership engagement.

Reflecting on MS. Towards the end of the interview we discuss the research project more and Karla asks me to explain the types of exploitation that can occur in the industry - she is shocked and begins to reflect on their 'partnership' with the outsourced cleaning team. Karla explains they have an open door policy where outsourced staff can come and speak to HR about issues with their payslips and problems with line managers (also external to the hotel). She says that this occurs often and their practice is to listen to the issues raised and escalate them to the cleaning company as they are unable to solve the issues themselves. Karla expresses shame for not being aware of MS especially as a member of the HR team. She feels she has a duty towards their staff and outsourced staff; she asks for advice on what they could do to improve the level of awareness among internal staff and external staff and starts thinking about including MS awareness in their mandatory training. She then reflects on potentially working with different organisations (NGOs, HMRC, and researchers) to increase their awareness and learn how they can improve their practices. I recommended a number of online sources and NGOs.

This interview is unique as Karla becomes gradually aware of the implications of MS throughout our conversation. As she begins to develop some understanding of how MS can impact her organisation she starts thinking of how she personally could incorporate changes in her role. She does not think of structural changes to the hotel's position/ the events team's role with external staff and sees it as a personal responsibility (relating to her role in HR) rather than the business/industry needing to change. A few weeks after the interview Karla emailed me to thank me for bringing the issue to her attention. She explained she was looking at posters (in multiple languages) that they could display by the staff lockers and found resources to develop training for their internal and external staff.

What is missing: The participant does not understand MS initially and there is no evidence that the participant or her company understand the risks of MS. Her current company does not produce a MSS. But her former company did. Still she is unaware of this and none of the policies or practices used in her former role addressed

MS, contrary to what was reported in their statements. There is no evidence of prevention mechanisms at the time of the interview but the participant is eager to implement changes upon discussing MS. There is no mention of seasonality and the impact it has on external workers, who are generally viewed as the responsibility of the staffing agencies. The company is not engaged in any partnerships at the time of the interview nor are they seeking to engage.