Conceiving and Addressing Modern Slavery in the Events Sector: A Narrative Analysis of Corporate Reporting

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Emerging literature explores modern slavery (MS) implications for businesses, yet corporate actors' understanding of MS risks and their role in risk mitigation remains understudied. This article explores how event sector stakeholders perceive and address MS risks, including human trafficking, labor, and sexual exploitation, by analyzing the conception of problems and solutions in relation to MS. Using narrative analysis, the article explores event companies' reporting under the 2015 UK Modern Slavery Act to gain a better understanding of how reporting can drive change in business practice, especially given the regulatory framework's limitations of defining precise reporting requirements. Findings show that risk management and mitigation generally translate into staff training, whistleblowing, (internal) auditing, and often a zero-tolerance approach. The article enables a deeper understanding of businesses' process of reporting standards and performance measurement. It theorizes corporate transparency and responsibility and outlines the practical implications of the limits of transparency and responsibility attribution.

Key words: Events; Corporate reporting; Modern slavery; Narrative analysis; Transparency

Introduction

Regulatory approaches to address modern slavery (MS) vary at international and even regional levels. To address the risks of MS in business, the UK introduced the 2015 Modern Slavery Act (MSA), which includes a corporate reporting requirement, aimed at increasing transparency around MS in the direct operations and supply chains of UK and international companies (HM Government, 2015; Nolan & Bott, 2018; Stevenson & Cole, 2018). Section 54 of the MSA stipulates that organizations with a turnover exceeding £36 million, who operate in the UK, should produce yearly modern slavery statements (MSSs) that outline the steps taken to ensure that MS is not present in companies' direct operations or their supply chains, and to publish the statements via their information on the company's websites. Since 2015 when the MSA came into effect,

attention has been given to why companies should report; however, less is understood about how MS is perceived and addressed in business practice. Recent studies seek to explain the meaning that companies attach to ethical, social, or labor issues in organizations (Goethals, 2019; Obara, 2017; Sarfaty, 2020), and debates are emerging on the responsibilities of companies (Stevenson & Cole, 2018; Wen, 2016). This article explores how event sector stakeholders conceive and address MS risks specific to events through the analysis of corporate narratives. It contributes to extant scholarship by theorizing corporate transparency and responsibility in the context of MS reporting (Anner & Dutta, 2019; Wen, 2016), and outlines the practical implications that pertain to debates on the limits of transparency reporting and responsibility attribution in event companies.

Although there is a lack of research specific to MS in the event sector, recent empirical studies on MS in hospitality and evidence from the Gangmasters and Labour Abuse Authority (GLAA) concludes that the sector is exposed to exploitative practices with profound implications for workers and communities (Baum & Lockstone, 2007; GLAA, 2020; Matheson & Finkel, 2013). Risks of labor exploitation are identified in event companies' direct operation and their supply chains (Paraskevas & Brookes, 2018; Stevenson & Cole, 2018). Cases of labor exploitation have been reported in connection to events venues in the UK, including circuses, racecourses, Christmas markets, fairgrounds, golf courses, and water sport parks (GLAA, 2020). On a global scale instances of labor exploitation have been identified in connection to mega-events such as the 2022 Qatar World Cup (Babar & Vora, 2022) and the NFL (McLeod et al., 2019). In addition, an increase in sexual exploitation of women and children has been reported in events such as Formula One Grand Prix, the FIFA World Cup held in Brazil, South Africa, and Russia, the US Superbowl (Wickey-Byrd et al., 2023), and several Olympic games including Beijing 2008, London 2012, and Rio de Janeiro 2016 (Matheson & Finkel, 2013; Wickey-Byrd et al., 2023). Moreover, the supply chain of events (construction, textile and garments, restaurants and catering services, etc.) have been identified by the ILO (2011) as industries

at risk due to highly exploitative labor practices (Smit, 2011).

While evidence of exploitative practices in events is emerging, corporate perceptions and responses remain less understood. Recent studies explore perceptions of human and labor rights issues in events (Janta et al., 2011; Ndiuini & Baum, 2021; Paraskevas & Brookes, 2018). However, MS and issues concerning labor exploitation, bonded labor, and human trafficking remain largely understudied (Getz & Page, 2019; Matheson & Finkel, 2013; Wickey-Byrd et al., 2023). With the increased demand for host of events, risks of exposure to MS increase, yet corporate responses to MS remain unknown in business environments.

The aim of this article is to advance knowledge on how event sector stakeholders conceive and address MS risks specific to events by analyzing the corporate narratives of problems and solutions in relation to the MS phenomenon. This article makes theoretical and practical contributions. First, we contribute theoretically to debates concerning transparency and corporate responsibility on MS in business environments by highlighting discrepancies among event companies in terms of their problem conception, assumed responsibility, and response through policies and practices. We also advance debates on MS and human rights in events scholarship using empirical evidence to identify sector-specific risks of MS. Second, we make a practical contribution by deriving recommendations based on our evaluation of the MSSs and theorization of transparency and corporate responsibility. We do so by engaging with Labovian narrative analysis, which enables us to (a) explore corporate perceptions of how MS is defined and addressed, (b) identify specific MS risks characteristic to events and analyze how they are managed and mitigated, and (c) map stakeholders' responsibility on MS in business environments.

Modern Slavery Reporting and the Events Sector

Recent studies on human rights and MS in the event and hospitality sectors coupled with operational characteristics lead to identifying risk factors linked to the direct operations and supply chains of events (Dowling et al., 2007; New, 2015; Smit, 2011; Stevenson & Cole, 2018). Risks of MS in events include labor exploitation, sexual exploitation, and

trafficking during mega-events (Barrientos, 2013; Matheson & Finkel, 2013; Müller et al., 2023; Ong & Lockstone-Binney, 2023; Paraskevas & Brookes, 2018; Robinson et al., 2019; Wickey-Byrd et al., 2023). These risks are further exacerbated by the complex supply chains and pose a major concern given the scale of the event sector. Studies conducted before the COVID-19 outbreak estimated that in the UK alone, the sector represented over half a million full-time equivalent jobs (Business Visits and Events Partnership [BVEP], 2020), of which a large extent is in seasonal, short-term employment. Estimated by BVEP (2020) to account for £70 billion of direct spending, events amount to half of the total spend in the UK visitor economy.

Events, however, are significant for more than their financial value. Most are resonant with specific geographies and as such play a crucial role in defining what makes destinations special: generating pride among residents as well as drawing outsiders in, often during off-peak periods (Paraskevas & Brookes, 2018). Recent studies on COVID-19 recovery (Subramaniam, 2022) and industry trends point to further growth in the event sector. Increased attention is paid to decent work, working conditions, and labor shortages in the sector (Ndiuini & Baum, 2021; Robinson et al., 2019). Yet, exploitative practices and severe issues concerning labor exploitation in the sector remain understudied (Getz & Page, 2019; Matheson & Finkel, 2013). NGOs recognize the importance of MSA noting that not many businesses understand what constitutes MS or how susceptible their supply chains are to it (Walk Free Foundation, 2019).

MS is likely to emerge in geographically isolated, small businesses with limited ability to capture value, and those governed by complex supply chains (New, 2015; Stevenson & Cole, 2018). The event sector suffers from fragmentation, geographic dispersion, and isolation. This, combined with the large number of events that occur annually, makes it a high-risk sector (Abson, 2017; Paraskevas & Brookes, 2018). Similar to the hospitality sector, labor rights and employment conditions in events render workers, many of whom are migrants, vulnerable to exploitative practices and abuse (Janta et al., 2011; Paraskevas & Brookes, 2018). The sector is generally poorly regulated and

business seasonality creates additional labor risks to volunteers and workers staffing events over short-term employment (Koenigstorfer et al., 2023; Ong & Lockstone-Binney, 2023), many of whom are employed via recruitment agencies (Crane et al., 2019; LeBaron, 2018). Furthermore, many businesses in the supply chain of event companies are also at high risk of exploitative labor practices (ILO, 2011; Smit, 2011).

MS overlaps with other crimes and human rights infringements and is often framed as human trafficking (HT). According to 2012 Bellagio-Harvard Guidelines, MS is defined as controlling a person and significantly depriving them of their individual liberty, with the intent of exploitation through the use, management, purchase, sale, profit, transfer, or disposal of that person (Allain, 2013). Distinguishing MS from other crimes and human rights abuses becomes problematic in a business context where MS represents an extreme on a continuum between exploitative practices and poor labor conditions (Barrientos, 2013; Koenigstorfer et al., 2023; Ong & Lockstone-Binney, 2023; Skrivankova, 2017).

Equally complex is the assessment of MS risk. The HM Government (2022) and the Human Rights Due Diligence (HRDD) introduced by the UN Guiding Principles advise a sequence of practices including *identification, measurement, assessment, evaluation, control,* and *monitoring*. In business practice, the mechanisms to address MS risks often draw from CSR, labor, and human rights practices, where independent actors play a crucial role in offering tools for risk assessment and HRDD (O'Kelly, 2019; Smith, 2021). HRDD is now part of legal standards and uses risk discourse to measure actual and potential negative impacts often classified as high, medium, or low based on their likelihood (Sarfaty, 2020). Research, however, advocates for techniques to assess both the likelihood of risk factors occurring *and* the seriousness of their consequences (Tummala & Schoenherr, 2011).

In popular discourse, MS is frequently framed in terms of subpar 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 employment issues with severe form of exploitation. The most common exploitative

practices associated with businesses is labor exploitation (including forced labor and debt bondage) Dowling et al. (2007) identified high risks of MS in industries governed by dangerous, difficult, and dirty employment, labeled as "3D" conditions.

3D conditions typically occur in low-paid and low-skilled jobs that require large numbers of flexible, seasonal workers (Christ & Burritt, 2018; Dowling et al., 2007), particularly in sectors that experience labor shortages. The events sector is characterized by these conditions (Lockstone-Binney et al., 2015; Paraskevas & Brookes, 2018). Workers are subject to long hours, exceeding 90 hr/week in some cases (GLAA, 2020). Most are offered low pay for short-term employment (Draper et al., 2018; GLAA, 2020), via "zero-hour" contracts, and some are not paid the national minimum wage (GLAA, 2020; ILO, 2011). The GLAA (2022) reported instances of charging recruitment fees, while evidence from the ILO (2011) suggested that a third of all forced labor is facilitated through labor providers or third-party agents, particularly where debt bondage and trafficking are involved (Barrientos, 2013; Wickey-Byrd et al., 2023). Events are reliant on outsourced labor, thus increasing the risks of exploitation. Many events do not recur in the same geographic location, meaning that businesses need to engage with new suppliers within a short time frame (Getz & Page, 2019). Drawing on MS in business scholarship allows to identify high-risk areas applicable to events. Recent research on MS in hospitality coupled with characteristics of events businesses uncovered additional risk factors linked to the direct operations and supply chains as illustrated in Table 1.

According to Broad and Turnbull (2018), the MSA plays a crucial role in constructing MS as a structural problem with implications for

Table 1

MS Risks in Business and MS Risks in Events

	MS Risk Factors for Business	MS Risk Factors Specific to Event Businesses
Risks of labor exploitation		
Direct operations	• 3D (dangerous, difficult, and dirty) (Dowling et al., 2007) • High proportion of SMEs (Dowson & Bassett, 2015) • Limited value capture (Crane et al., 2019)	• 3D—conditions of work: long hours; low-pay; seasonal/short-term work; recruitment fees • Zero-hour contracts (Dowling et al., 2007) • Geographic dispersion & franchising models of operation (New, 2015) • Domination of SMEs (Dowson & Bassett, 2015) • Human rights infringements in events (Ong & Lockstone-Binney, 2023; Koenigstorfer et al., 2023)
Supply chains	• Outsourcing goods: Geographic isolation	• Outsourcing goods: Geographic isolation—seasonal and/or nonrecurring • Dependence on high-risk industries: construction, textile and garments, food suppliers, restaurants and catering services, downstream activities (waste management) (Crane et al., 2019; Smit, 2011)
	• Outsourcing labor: Poor labor regulation • UK has the largest agency sector in Europe (Crane et al., 2019) • 3D dangerous, difficult, and dirty) (Dowling et al., 2007) • High demand for flexible, seasonal workers • Labor shortages (Crane et al., 2019)	• Outsourcing labor: Poor labor regulation—largest agency sector in Europe (Crane et al., 2019) • Reliance on agency workers and migrants (Baum & Lockstone, 2007) • 3D conditions of work: long hours; low-pay; seasonal/short-term contracts; short lead time between recruiting and employing staff (Dowling et al., 2007) • Seasonal/short-term work (Crane et al., 2019); nonpayment of the national minimum wage; recruitment fees; zero-hour contracts (Paraskevas & Brookes, 2018)
Risks of sexual exploitation		
Direct operations	• Commercial sexual exploitation • Forced prostitution • Sex trafficking	• Events venues used for sexual exploitation (Paraskevas & Brookes, 2018) • Trafficking and sexual exploitation in mega events and sports events (Smit, 2011; Wickey-Byrd et al., 2023)

businesses. The MSA is the first national legislation to use the term MS and to explicitly target slavery as opposed to HT, forced labor, or other forms of exploitation (Broad & Turnbull, 2018; Craig, 2017). The MSA is supplemented by the transparency in supply chain (TiSC) cuidance (HM Government, 2017, 2022), which encourages businesses outside the scope of the provision to report. Thus, even though the MSA is focused on the practices of large companies operating in the UK, small and medium-sized partners and suppliers of these companies are encouraged to report, thus expanding the scope of legislation (Craig, 2017). Although the TiSC Guidance does not dictate MSS content, it offers a non-exhaustive list of information that may be included.[1] At a global level, multiple states have introduced reporting requirements for MS, HT, human rights, and child labor (Cossart et al., 2017): France introduced "Duty of Vigilance" civil liability law in 2017, Australia passed its own "Modern Slavery Act" in 2018, the Netherlands adopted the "Responsible and Sustainable International Business Act" in 2022 to replace the "Child Labour Duty of Care Act" of 2020, and the US state of California introduced "Transparency in Supply Chains Act" in 2010. However, many countries recently associated with exploitative practices still lack such legal frameworks.

Qualitative empirical studies in industries exposed to exploitative practices with profound implications for workers' human and labor rights (including hospitality, aviation, textile, food, and tobacco) show that MS reporting is sparse (Monciardini et al., 2021; Ringham & Miles, 2018; Stevenson & Cole, 2018; Walk Free Foundation, 2019). Studies revealed that transparency mechanisms concerning MS revolve around auditing and certification. These mechanisms remain the most common ways of collecting information and constructing corporate assurances of corporate responsibility (Hirsch et al., 2020). However, other core elements of transparency for business engagement are lacking, including identifying appropriate metrics to measure progress for which there are no standards or external validation. Findings from food and tobacco sectors show that responsibility is devolved via codes of conduct to suppliers, who operate under the pressure of profitability. This is also problematic in events given the exploitative

labor practices associated with infrastructure development and supply chains (ILO, 2011; Smit, 2011). Yet, little is known about MS reporting in events.

Overall, the quality of MSSs published across sectors since the MSA has been the focus of criticism from academics and MS practitioners. Reports by the Ethical Trading Initiative (ETI) claimed that MSSs do not drive the changes needed in business practice to eliminate exploitation in supply chains (ETI, 2018; Wen, 2016). Evidence shows that reporting is informed by practices employed to respond to other CSR, labor, or human rights issues in supply chains (O'Kelly, 2019; Sarfaty, 2020). Research exploring managers' sense-making of CSR reporting in the hospitality sector demonstrated that UK managers perceive CSR issues as threats rather than opportunities to report, which plays a key role in making symbolic or substantive responses (Ringham & Miles, 2018). Neither the MSA nor the TiSC Guidance (HM Government, 2017) prescribe the form, content, or level of detail that companies must disclose. This leaves discretion to businesses to explain their policies and practices in ways suiting their circumstances (Wen, 2016). Within the regulations, there are no clear requirements about form or content, while failure to report does not lead to legal or financial penalties, an aspect of continued critique in scholarship and practice (Modern Slavery Registry, 2019; Nolan & Bott, 2018; Stevenson & Cole, 2018). These factors have stimulated ongoing debates about the capacity of the MSA to change corporate practice (Wen, 2016). A specific critique is the failure to make reporting mandatory or hold companies accountable for poor reporting practice. While MS and broader labor and human rights issues are beginning to receive attention in event scholarship, corporate understanding of MS remains underexplored. Empirical studies on human rights in business inform the theoretical significance of linking interpretation of issues and solutions developed in response (Goethals, 2019; O'Kelly, 2019; Obara, 2017). This is important for increasing transparency, attributing responsibility, and informing the kind of solutions companies develop. Given the extent of the event sector and its risk of MS transgressions, this is a particularly important area of interest. This research seeks to address this gap by exploring how event companies perceive and address MS risks specific to events

by using narratives to analyze companies' conception of problems and solutions in relation to the MS phenomenon.

Methodology

This study uses a constructivist qualitative methodology (Yanow, 2015) to understand how key stakeholders in event organizations construct reality using language and narratives (Czarniawska, 2004; Riessman, 2004). This methodology leads to understanding the actions taken by senior stakeholders in events to report and address MS, through the review of empirical data. We use narrative analysis to gain understanding of how reporting can drive change in business practice especially in instances in which reporting guidelines lack specific details about the issues against which reporting should be conducted or the type of reporting required (Plummer, 1994). Corporate documents provide data on formal expression in relation to the MS phenomenon (Czarniawska, 2004; Labov & Eckert, 2002). The MSSs are corporate response that communicate companies' commitment against MS. They represent social constructs of how senior event stakeholders involved in their production perceive MS, their role, and responsibilities in addressing it (Czarniawska, 2004).

Data Collection

We adopted purposive sampling (Creswell & Poth, 2016; Plummer, 1994) and targeted event organisations and suppliers that report under the MSA the steps undertaken to address MS and HT in their internal operations and their supply chains (HM Government, 2015). The targeted organisations are (1) involved in planning or hosting a broad range of business events, festivals, cultural events, and sporting events; (2) operate in the UK, and (3) have an annual turnover of (over) £36 million, and therefore required to report under the MSA (HM Government, 2015). All statements were downloaded from publicly available sources: event companies' websites, the Modern Slavery Registry (Modern Slavery Registry, 2019), or the Central Registry of Modern Slavery Statements launched by the UK Government in 2021 (HM Government, 2022).

To identify companies that fulfill the criteria, we conducted a series of web searches and consulted sector specific publications (BVEP, 2020; Events Industry Council, 2022). The study is based in the UK, given that the country has relevant MS legislation and the largest agency sector in Europe (Crane et al., 2019). To maintain an accurate record of sourcing the MSSs, we made a series of notes assessing access and compliance to TiSC requirements (HM Government, 2017) notes in Table 2. Thus, data gathering and analysis was simultaneous and meaning making occurred throughout the research process (Creswell & Poth, 2016). We classified companies using the typology for planned events (Getz & Page, 2019) along with the UK Standard Industrial Classification of Economic Activities. At the core of the research are:

a. *Event management companies* also referred to as *event production companies, events organizations, or event planning companies* (SIC codes: 82301, 82302, 90020, 90040)
b. *Event venues*: conference centers, hotels, sporting arenas, and private parks (SIC codes: 55100, 90020, 90040)
c. *Event suppliers* (SIC codes: 56210; 78200)[2]

Following the MSA, businesses have been required to publish a statement since 2016, yet, in late 2023 when we conduct the analysis, companies had produced an average of three MSSs. It is unclear whether this is linked to the financial impact of the COVID-19 pandemic, resulting in businesses not meeting the £36 million threshold or to other issues. We sourced a total of 64 MSSs from 21 companies required to report under the MSA. Where available, previous statements were supplemented from the Modern Slavery Registry; however, not all companies were listed on the registry, which poses a limitation to analyzing the construction of the companies' narrative over time.

Data Analysis

To explore event companies' conception of problems and solutions in relation to the MS phenomenon, we used the *Labovian model of narrative analysis* and the *TiSC Guidance* (Riessman, 2004).

Table 2
MSS—Company Classification and Compliance to Minimum Requirements

Company Classification	MSS Compliance Minimum Requirements			
	Statements Available	Statements Available on UK Website (Homepage)	Statements Approved by Board of Directors (or Equivalent)	Statements Signed by Director (or Equivalent)
Event management companies				
Capita Travel & Events	2021, 2019[b], 2018[a], 2017[a]	Y; only 2021 statement	Y	Y
CWT	2021, 2018[b]	Y; ethics and compliance page	Y	N
Clarion Events	2021, 2019[b], 2018[a]	Y; only 2021 statement	N	Y
Glastonbury Festival Events	2022, 2019[b]	Y; only 2022 statement	N	Y
ITE Group PLC (rebranded: Hyve Group)	2019, 2018[b]	Y; only 2019 statement	Y	Y
Jack Morton Worldwide	2021, 2018[b], 2017[a]	N	Y	Y
Layer123 (Euromoney)	2022, 2019[b], 2018[a], 2017[a]	Y; only 2022 statement	Y	Y
Event venues				
Accor	2020, 2019	N	Y	Y
AELTC (Wimbledon)	2022, 2019[b], 2018[a]	N	Y	Y
Bewl Events & Waterpark	2017[b]	N	N	Y
Hilton	2020, 2019, 2018, 2017, 2016	Y; all statements	Y	Y
IHG	2021, 2016[b]	N	Y	Y
The O2 (Ansco Arena)	2021, 2019[b], 2017[a]	Y; only 2021 statement	N	Y
NEC Group	2021, 2019[b], 2017[a], 2016[a]	Y; only 2021 statement	Y	Y
SMG Europe rebranded: ASM Global	2020, 2018[b]	Y; only 2020 statement	N	Y
Whitbread	2021, 2020, 2019, 2018	Y; all statements	Y	Y
Event suppliers: catering and staffing				
Admirable Crichton Group	2021, 2018[b]	Y; only 2021 statement	Y	N
Compass Group	2021, 2019[b], 2018[a], 2017[a]	Y; only 2021 statement	Y	Y
CH&CO	2020, 2019[b], 2018[a], 2017[a], 2016[a]	Y; only 2020 statement	N	Y
Elior Group	2020, 2019, 2018, 2017, 2016	Y; all statements	N	Y
Rhubarb Hospitality Collection (RHC)	2020, 2017[a]	Y; only 2020 statement	N	Y

Note. [a]Statements used to be available on Modern Slavery Registry; [b]Statements sourced in 2019 - no longer available online.

This strategy helped us generate in-depth understanding of the actions taken by event companies in responding to MS, through the review of primary data sources. According to Labov (1972) narratives are stripped of emotion and structured based on the six elements*: abstract, orientation, complicating action, resolution, evaluation*, and *coda*. We situate MSSs in the context of the MSA which triggered their production. Exploring the content of the MSSs enriched the analysis by providing insight into the functions of different elements within the statements (Labov, 1972). The content of MSSs includes concrete information (identifying risks and detailing policies and processes to mitigate those risks) (Labov, 1972; Labov & Eckert, 2002). Using the Labovian model, we analyzed the MSSs by asking the following questions:

Abstract and *orientation:* How is MS perceived and defined? What is the context of reporting?

Complicating action, evaluation and *resolution*: What specific MS risks are identified and how are they managed and mitigated?

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

Results: Narratives of Modern Slavery in Events

The analysis informs the reconstruction of two narratives (Labov, 1972) focusing on 1) *compliance to the MSA*, and 2) *responsibility towards those impacted by events*, as illustrated in Figure 1.

The *compliance narrative* portrays MS as an external issue, largely associated with supply chains, where companies are required to report due to their annual turnover to ensure legal compliance under the MSA. In contrast, the *responsibility narrative* portrays MS as a threat to vulnerable people facing

Compliance Narrative	Responsibility Narrative
Event organizations, Venues, and Suppliers: Admirable Crichton Group, Bewl Events & Waterpark, Capita Travel & Events, CWT, CH&CO, Clarion Events, ITE Group, Compass Group, Jack Morton, Layer123, NEC Group, The O2 Arena, Rhubarb, SMG	**Event organizations, Venues, and Suppliers:** Accor, AELTC, Glastonbury, Hilton, IHG, Venue Elior, Whitbread
Key characteristics: ▪ Commitment to risk prevention ▪ Compliant due to annual turnover ▪ Zero-tolerance approach; vague perception of risks ▪ No specific types of exploitation identified ▪ Labor exploitation not discussed ▪ Internal auditing ▪ Language: largely third person (*key words*: "the company"; risk**)**	**Key characteristics:** ▪ Commitment to operating responsibility ▪ Proud to report ▪ Risk-mapping ▪ Focus on sexual exploitation/ CSE ▪ Labor exploitation not discussed *but* industry described as "labor intensive," reliance on seasonal staff acknowledged ▪ Third party auditing; supply chain auditing ▪ Language: largely first person (*key words:* "we," "our people," "our company;" human rights)
Narrative analysis ▪ **Abstract:** vague definition of MS; MS perceived as an *external issue*; no significant MS risks ▪ **Orientation:** context of reporting - compliance to MSA due to annual turnover ▪ **Complicating action:** no specific MS risks or exploitative practices identified; no internal MS risks; some supply chain risks ▪ **Evaluation:** uncertainty over MS risk evaluation: no information on risk-mapping, risk assessments, or disclosure mechanisms ▪ **Resolution:** zero-tolerance approach; internal auditing; steps to mitigate MS risks: *identify, assess, monitor, reduce, and protect whistle-blowers* ▪ **Coda:** commitment to annual reporting and improving practices; some stakeholder responsibility attributed at group level	**Narrative analysis** ▪ **Abstract:** vague definition of MS, MS perceived as an *issue to (vulnerable) people* facing exploitation internally (direct operation) and externally (supply chain structures) ▪ **Orientation:** context of reporting - commitment to operating responsibly ▪ **Complicating action:** MS risks linked to direct operation and outsourcing channels: *sexual exploitation* and *child sexual exploitation (CSE)*; some concern for staff, fair recruitment, and employment policies but *labor exploitation* not discussed ▪ **Evaluation:** supply chain mapping (tier-1 suppliers); due diligence processes and essential management tools for risk identification; recruitment policies and processes; training and tools to spot common signs of exploitation for staff; limited influence over the employment practices applied by labor agencies ▪ **Resolution:** third party auditing; supply chain auditing; steps to mitigate MS risks: *identify, assess, monitor, reduce, and protect whistle-blowers*; staff training ▪ **Coda:** commitment to annual reporting and improving practices; dedicated stakeholder responsibility at group and regional level
Shared characteristics: ➔ Vague definitions of MS; ➔ Steps to mitigate MS risks: *identify, assess, monitor, reduce, and protect whistle-blowers*; ➔ Limited evidence of specific MS risks; Labor exploitation not referenced; Key words: commitment; compliance; responsibility; prevention.	

Figure 1. Compliance and responsibility narratives.

exploitation and the purpose of reporting is linked to businesses' commitment to operating responsibly towards employees, supply chain workers, and local communities. The two narratives present nuanced interpretations of MS pertaining to mainstream perspectives and solutions to addressing MS risk in business. The perceptions of MS risk lead to certain solutions being developed and deployed.

Compliance Narrative

A *compliance narrative* is centered on companies' commitment to reducing the threat of MS. Companies express firm commitment to "preventing acts of MS and HT." However, there is limited detail demonstrating how commitment is upheld, which actions lead to prevention, and the effectiveness of such actions due to limited performance management disclosure. Statements are written in the third person, and MS risks are framed under familiar business terms consistent with CSR discourse (Merry & Levitt, 2019; O'Kelly, 2019). The *compliance narrative* associates the purpose of reporting with compliance to the MSA due to the companies' 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, 2020)

The *compliance narrative* conveys a vague definition of MS 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 significant risks" to "some supply chain risks":

> 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, 2021)

It is unclear how businesses become informed about MS risks due to no disclosure of mechanisms used to assess the nature and exposure to MS to support this conclusion. We raise concerns given the event sector's reliance on practices that are found to increase the risk of MS and particularly for labor exploitation (Christ & Burritt, 2018; Crane et al., 2019). However, from a compliance perspective, companies are under no legal requirement to investigate whether their labor practices are high risk; hence, critique is made that the MS legislation results in poor risk assessment and vague reporting. In contrast, where some risks are identified they are associated with supply chains, as such MS is perceived as an external issue within the *compliance narrative*. Despite increasing evidence that subcontracting labor fuels exploitative practices (LeBaron, 2018; LeBaron & Rühmkorf, 2017), suppliers are generically summed up as "many and varied" (The O2 Arena, ITE, NEC Group, CWT, Rhubarb). The *compliance narrative* makes no mention of labor exploitation nor of reliance on agency staff. Therefore, in the context of this narrative *what* constitutes a risk is not defined, and risks are seldom associated with any specific type of exploitation, category of subcontractors, sector, or geographical region. Exception to this are Capita and Layer 123 who portray risks as external issues but engage in some supply chain mapping:

> 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, 2022)

To mitigate the risks associated with MS, most companies use the same sequence of steps: *identify, assess, monitor, reduce,* and *protect whistleblowers*. However, measuring the effectiveness of risk management is largely omitted from the statements underpinning this narrative. CH&CO, Bewel Events, CWT, and Capita express a "zero-tolerance" or "no tolerance" to MS and HT and require their suppliers to comply with applicable laws and codes of conduct. CH&CO extended their zero-tolerance approach to their employees, who face disciplinary action and dismissal for gross misconduct if found in breach of policies relating to MS and HT. Zero-tolerance approaches are heavily criticized by scholars and practitioners for failing to lead to improved practices. Instead, the ETI (2018)

recommends working with at-risk suppliers to provide training and implement anti-slavery policies.

The *compliance narrative* is underpinned by reliance on internal auditing conducted by Compliance or Ethics Departments or by the Legal Departments. At the time of the analysis, companies did not report the legal frameworks, outcomes, or frequency of auditing; consequently, it is difficult to ascertain the effectiveness of internal audits. MS practitioners state that internal auditing alone is unlikely to identify instances of exploitation without the support of other antislavery policies and practices (HM Government, 2017).

An ongoing commitment is reflected in businesses' decision to produce yearly reports and to make previous reports available:

> We will continue to strengthen our approach to managing the risk of modern slavery within our business and supply chains and: continue to roll out training and increase audits of our high sustainability risk suppliers. (Capita, 2021)

However, in many cases analyzing previous statements is a limitation due to their unavailability. Statements covering different years largely report the same information and most changes are stylistic rather than content related.

Responsibility Narrative

A *responsibility narrative* outlines a distinct perspective that demonstrates some concern for staff, recruitment, and employment policies. It explains how the sector is exposed to MS risks linked to direct operation and outsourcing channels. It associates the purpose of reporting to organizations' commitment to operating responsibly therefore organizations are "proud to report." It pledges commitment to "operating responsibly," "acting ethically," or "purchasing in an ethical and transparent manner," and "to assessing the impact" organizations 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; Elior; Accor; AELTC; Hilton):

> 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. (Hilton, 2020)

The language and terminology of the *responsibility narrative* is specific to HRM discourse, whereby labor and human rights terminology frames exploitative practices as "fair recruitment and employment" (O'Kelly, 2019). MSSs are written in the first person and use collective terms "we," "our people," and "our company" throughout. This narrative also offers a vague definition of MS and HT. However, MS is seen as an issue affecting (vulnerable) people facing exploitation internally (concerning the companies' direct operations) and externally (linked to subcontracting and supply chains). This means that internal MS risks are in part identified and that companies demonstrate more evidence of recognizing their role in addressing MS:

> 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, 2021)

The *responsibility narrative* largely associates internal MS risks with sexual exploitation and sex trafficking. This is partly because four of the seven companies are hotels (although classified as events venues in the context of this research) and therefore exposed to additional risks of sexual exploitation (Paraskevas & Brookes, 2018; Robinson, 2013; Wickey-Byrd et al., 2023), although empirical evidence suggests that labor exploitation is more prevalent (Dowling et al., 2007; GLAA 2020, 2022). None of the companies discussed risks of labor exploitation and instead referred to "preventing illegal working." Therefore, labor risks are presented as "employment conditions" and "recruitment standards." Still, organizations recognize 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)

In our industry part-time, agency and work-ers are more typical than the traditional full-time employee. (Elior, 2020)

The *responsibility narrative* is underpinned by supply chain mapping detailing numbers, expenditure, and breakdown of companies' supply chains consistent with TiSC Guidance (2021). They used rigorous due diligence approaches to assess suppliers' operation to determine "inherent or perceived" supply chain risks; however, most statements referred primarily to tier-1 suppliers (AELTC, Hilton, IHG). Overall, companies' approaches to mitigate MS risks followed the same five step sequence observed in the *compliance narrative: identify, assess, monitor, reduce,* and *protect whistleblowers* coupled with *staff training*. Statements covered policies and legal documents required when hiring staff.

This, however, was not applicable to outsourced staff. Although briefly mentioned by Accor, Glastonbury, Elior, and Hilton, the implications of outsourcing workers in assessing and mitigating risks of exploitation was not detailed in any of the MSSs. Instead, the companies clarify that they had limited influence over the employment practices applied by agencies. Although the TiSC Guidance advises investigating working conditions via third-party auditing (HM Government, 2022), there is no evidence of this being followed to identify risks or instances of labor exploitation in their engagement with staffing agencies. Nevertheless, the seven companies still demonstrated more evidence of direct engagement with other suppliers. The *responsibility narrative* presents some evidence of risk assessments to map supply chain risks, in some cases by commissioning external partners to assess human rights risks most relevant for events, travel, and hospitality at regional and global levels:

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, 2022)

The *responsibility narrative* also concluded with reflections on companies' commitment to report on a yearly basis. Similarly, to the *compliance narrative*, previous statements were not always available and where the same information was reported, while most changes were stylistic rather than content related.

Discussion

The narrative analysis reveals that events companies perceive and address MS in distinct ways. This depends on whether their MSSs are underpinned by a *compliance narrative* or a *responsibility narrative*, although the definition and perception of MS remain vague in both narratives. The *compliance narrative* portrayed MS as an external issue, largely associated with supply chains. It attributed the statement to the requirement to publish due to their annual turnover. This means that the purpose of reporting was to ensure legal compliance under the MSA, which was achieved in many instances, irrespective of the quality of reporting. In contrast, the *responsibility narrative* portrayed MS as a threat to vulnerable people facing exploitation. Here the purpose of reporting was linked to businesses' commitment to operating responsibly and the impact they have on their people (employees, supply chain workers, and local communities). However, assessing the significance of reporting and corporate commitment in the sector poses challenges since neither the likelihood nor severity of risks are established by MSSs (Sarfaty, 2020; Tummala & Schoenherr, 2011). The distinction between the *responsibility* and *compliance narratives* lies in how the companies underpinning the two narratives perceived MS and the significance of transparency and reporting as reflexive practice in risk management. These perspectives of MS informed the positions that different businesses adopted regarding reporting and were reflected in the content and level of detail of the statements underpinning those two narratives.

Theoretical Contribution

The findings lead us to our first contribution through which we advance the debate on transparency and responsibility to address MS in business by exploring corporate reporting. Using the

Labovian narrative analysis, we find that the reflexive and transformative outcomes expected of transparency in MS reporting and responsibility for MS (ETI, 2018; Ringham & Miles, 2018; Wen, 2016) may be limited by the ambiguity in the ways event companies conceive MS and their role in addressing it. This allows us to theorize the links between how MS is defined in business environments and how companies engage with it (or choose not to) through substantive or symbolic responses.

Our findings show a lack of clarity concerning event sector perceptions and definitions of MS. MS was vaguely defined across both narratives. Reporting was lacking in specific terminology and detail (Merry & Levitt, 2019; O'Kelly, 2019) particularly relating to the types of exploitation that can occur internally. This is concerning given that labor exploitation is found to be the most common exploitative practice associated with businesses (Crane et al., 2019; LeBaron, 2018), which is further exacerbated given the characteristics of events. The use of unspecific terminology neutralizes and diminishes the implications of MS for the industry (O'Kelly, 2019; Sarfaty, 2020) and the sense of urgency it is meant to warrant. This also means that labor and sexual exploitation risks are not fully acknowledged and that preventive mechanisms are not fully implemented. Consistent with CSR research (Ringham & Miles, 2018), findings show that understanding of implications of MS informs making symbolic or substantive responses. Companies appear to be unaware of the implications of outsourcing labor and how subcontracting can lead to lower labor standards and reduce the rights of workers (Crane et al., 2019; Gold et al., 2015; LeBaron, 2018) and therefore make limited reporting on this account.

We also observe a discrepancy concerning risk-mapping and mitigation as a result. The *compliance narrative* does not acknowledge any internal MS risks. Instead, MS implications are devolved to supply chains, even though supply chain mapping is largely omitted from those statements. Within the *responsibility narrative* some internal MS risks were acknowledged; event venues demonstrated more evidence of recognizing their role in addressing some MS issues. However, internal risks were mainly associated with sexual exploitation and sex trafficking at events venues and hotels. The *responsibility narrative* acknowledged some characteristics of the event sector described as "intensive and largely local," where "part-time, agency, and casual workers are more typical than the traditional full-time employees." However, labor exploitation was not specifically discussed but framed in HRM terms as employment conditions and recruitment standards, further diminishing the implications of MS for the industry (O'Kelly, 2019; Sarfaty, 2020). While this might address debates on human rights and overall working conditions (Ndiuini & Baum, 2021; Ong & Lockstone-Binney, 2023; Robinson et al., 2019; Wickey-Byrd et al., 2023), none of the event companies addressed specific MS risk associated with their core labor practice, their reliance on migrant workers, or practices that included charging recruitment fees, in their attempt to reduce the risk to bonded labor (Crane et al., 2019; LeBaron, 2018).

Furthermore, we also find that differences in event companies' commitment to compliance and responsibility do not translate into difference in the way businesses attribute responsibility internally. On the contrary, as shown in Table 3, we find ample similarities between the companies in the attribution of responsibility to address MS across key roles and function areas at group and regional level:

These similarities in attributing internal responsibility raise questions concerning how responsibility, labeled in some cases as "accountability," is upheld by companies given the limited disclosure. Expressing commitment for MS responsibility is an opportunity for all organizations to make promises and to convey their dedication to addressing MS (Monciardini et al., 2021). The attribution of responsibility, however, overlooks events companies' engagement with outsourced workers. Furthermore, findings showed that the sector was reliant on existing policies, and "zero-tolerance" approaches in their engagement with suppliers. According to Hirsch et al. (2020), codes of conduct and related CSR practices fail to eliminate dangerous and exploitative working conditions or other labor rights infringements in supply chains. Although they can help to improve working conditions in some circumstances (Barrientos, 2013), researchers stress that codes of conduct need to be combined with meaningful remediation, and long-term engagement with suppliers (Anner & Dutta,

Table 3

Mapping MS Responsibility in Events

Key Function Areas	Dedicated Responsibility
Group level	
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 subdivision of legal department)	Conduct audits in all areas of the business (direct operations and supply chains).
Regional level	
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.

2019; Locke & Samel, 2018). Therefore, this research recommends that compliance and sourcing efforts need to be aligned to ensure greater improvements towards employment and labor exploitation in the sector.

Consistent with scholarly debates, this research points to the limitations of transparency. The limits of transparency reporting are highlighted by narratives that frame MS as CSR or HRM issues, which lead to symbolic responses with some implications for practice but limited responsibility distributed to stakeholders towards addressing labor exploitation. Transparency, although deemed necessary, is not sufficient to achieve positive change alone. Findings support the need for change to the MSA to include mandatory reporting, robust monitoring, and a statutory body with the responsibility to ensure accountability (Christ & Burritt, 2018; Wen, 2016).

Practical Contributions

Our practical contribution informs how organizations in the event sector may improve their corporate reporting and increase transparency around MS in their operations and supply chains. We observed that companies' approaches to mitigate

supply chain risks were presented in both narratives as a sequence of five steps: *identify, assess, monitor, reduce,* and *protect whistleblowers.* The issue lies in the level of detail supplementing these steps, which emerges from how businesses perceive MS. This shows that companies' vague interpretation of MS and their lack of specificity creates untargeted responses supported by existing policies. Findings showed that risk management and mitigation in the event sector generally translated into staff training, whistleblowing, auditing (mainly internal), and often a zero-tolerance approach. More importantly, performance measurement was omitted from most statements. Hardly any companies measured the effectiveness of their risk management tools. Those who did failed to provide the appropriate evidence to support their findings within the MSS. Consequently, it was difficult to ascertain whether the measures adopted by event companies were driving the changes needed in practice to prevent and eliminate exploitation in supply chains, raising questions over the level of transparency in MS reporting.

Therefore, to improve the standard of MS reporting, we recommend that key actors in the event sector use MS-specific terminology. They should also engage in risk-mapping exercises and due diligence that tackles labor exploitation as an important step in

achieving decent work and economic growth in the event sector and in encouraging responsible corporate practice. Perceiving MS as an external issue or simply associating it with sexual exploitation risks denotes a lack of awareness of the labor risks in the event sector (Crane, 2013; GLAA, 2022; LeBaron, 2018) and limited understanding of the full scope of the MS agenda (Craig, 2017). Key factors that have led to a lack of awareness on the implications of MS to businesses have been linked to the hidden nature of MS (Bales, 2007) and its lack of observability (Crane et al., 2019). Yet, as shown in our findings, due diligence and transparency mechanisms that could lead to improved awareness and evidence of exploitation appear underdeveloped in the sector. To address MS risks, it is recommended that event business report externally on the risk-mapping exercises and due diligence that tackles labor exploitation to improve transparency and lead the sector forward.

Conclusion

This article applied narrative analysis to MSSs produced by event companies in the UK as a novel analytical tool to understand how event sector stakeholders conceived and addressed MS risks specific to events. This enabled us to explore how event companies conceive and address MS risks specific to events by analyzing the corporate narratives of problems and solutions in relation to the MS phenomenon. Findings inform the reconstruction of two distinct narratives of MS focusing on *compliance* and *responsibility,* which reveals discrepancies among event companies in terms of their problem conception, assumed responsibility, and response through policies and practices. This highlights the importance of focusing on corporate narratives on MS and enables us to advance the discussion on the limitations of transparency in corporate reporting. This research concludes that corporate perceptions on MS in business informs business requirements for transparency and for attributing responsibility to address MS risks. We advance debates on sector-specific risks of MS and the significance of transparency and reporting as reflexive practice in risk management. Our findings inform the understanding of problems and solutions in addressing MS within businesses and their

supply chains. They highlight discrepancies in the companies' approaches to reporting regarding how they conceive the problem, the extent to which they assume responsibility for it, and how they respond through their policies and practices.

To improve MS reporting standards in the event sector and address MS risks we provide business and policy recommendations as follows. First, recommendations for event companies are threefold: 1) to use MS specific terminology (particularly in identifying labor exploitation internally and in subcontracting workers); 2) to report risk-mapping exercises and due diligence that tackles labor exploitation; and 3) to engage in performance management by adopting metrics to demonstrate progress over time, to improve transparency and show leadership in the sector. Second, the findings support calls for mandatory reporting and strengthening the current Section 54 of the 2015 MSA (Modern Slavery Registry, 2019; Nolan & Bott, 2018; Stevenson & Cole, 2018; Wen, 2016). This research recommends that the TiSC Guidance (HM Government, 2022), which currently informs a large extent of the reporting, 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 MSSs, it fails to inform the quality of reporting. Making the TiSC Guidance part of the compliance requirements within mandatory MS reporting would require companies to ensure the content reported is consistent with their practices. This could enable organizations to better identify and mitigate risks.

Exploring the effectiveness of risk management tools was a limitation particularly given the lack of detail in the analyed MSSs. Performance management was evidenced as a problematic area for many businesses in measuring the effectiveness of policies and processes, building capacity, and reporting the KPIs used in mitigating MS risks. According to the UK Home Office, carefully designed KPIs could help organizations demonstrate their progress over time in preventing MS in their business or supply chains (HM Government, 2017). However, this was not the case in most of the analyzed statements. This renders performance management a particular area of concern for business practices. Further research is warranted to explore this by

engaging stakeholders responsible for producing the MSSs in discussion. The article lays the ground for future exploration of how MS risks are identified and mitigated, stressing the need for further analysis on the role of business responsibility and liability in connection to MS to enhance reporting in the sector. The article calls for further research to explore the motivation of MS reporting and business practices that will lead towards increasing the quality of MSS in the sector.

Notes

[1]Organization 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.

[2]Events suppliers includes a range of companies specializing in advertising, speakers, budgeting, security, invitations, decoration, flowers, site selection, staffing, ticketing, catering, event photos, sound systems, food, transportation, gifts, furniture, limousines, fireworks, lighting, internet access, information desk, lodging, accommodation, parking, and many more. For this research, Catering and Staffing suppliers are selected because they are deemed at a higher risk of MS practices (LeBaron, 2018) due to their high reliance on unskilled migrant workers and working conditions.

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