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Title: Draft BS ISO 37200 Managing the risk of modern slavery: Guidance for the prevention, identification and response to human trafficking and forced labour.

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## Introduction

This draft standard is based on national and international discussions. Your comments on this draft are invited and will assist in the preparation of the consequent standard.

For international standards, comments will be reviewed by the relevant UK national committee before sending the consensus UK vote and comments to the international committee, which will then decide appropriate action. If the international standard is approved, it is usual for the text to be published as a British Standard.

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## UK Vote

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## Submission of Comments

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## Template for comments and secretariat observations

|                  |                        |
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| 1  | 2                                          | (3)                          | 4               | 5                                                                                                                                  | (6)                                                                      | 7                                                  |
|----|--------------------------------------------|------------------------------|-----------------|------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------|----------------------------------------------------|
| MB | Clause No./ Subclause No./Annex (e.g. 3.1) | Paragraph/ Figure/Table/Note | Type of comment | Comment (justification for change) by the MB                                                                                       | Proposed change by the MB                                                | Secretariat observations on each comment submitted |
|    | 3.1                                        | Definition 1                 | ed              | Definition is ambiguous and needs clarifying.                                                                                      | Amend to read '...so that the mains connector to which no connection...' |                                                    |
|    | 6.4                                        | Paragraph 2                  | te              | The use of the UV photometer as an alternative cannot be supported as serious problems have been encountered in its use in the UK. | Delete reference to UV photometer.                                       |                                                    |



# DRAFT International Standard

## ISO/DIS 37200

### Managing the risk of modern slavery: Guidance for the prevention, identification and response to human trafficking and forced labour

ICS: 03.100.02

ISO/TC 309

Secretariat: **BSI**

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**2026-02-23**

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## Foreword

ISO (the International Organization for Standardization) is a worldwide federation of national standards bodies (ISO member bodies). The work of preparing International Standards is normally carried out through ISO technical committees. Each member body interested in a subject for which a technical committee has been established has the right to be represented on that committee. International organizations, governmental and non-governmental, in liaison with ISO, also take part in the work. ISO collaborates closely with the International Electrotechnical Commission (IEC) on all matters of electrotechnical standardization.

The procedures used to develop this document and those intended for its further maintenance are described in the ISO/IEC Directives, Part 1. In particular, the different approval criteria needed for the different types of ISO documents should be noted. This document was drafted in accordance with the editorial rules of the ISO/IEC Directives, Part 2 (see [www.iso.org/directives](http://www.iso.org/directives)).

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This document was prepared by Technical Committee ISO/TC 309 Governance of organizations.

Any feedback or questions on this document should be directed to the user's national standards body. A complete listing of these bodies can be found at [www.iso.org](http://www.iso.org).

## Introduction

This document provides organizations with practical guidance for managing the risk of modern slavery in their operations, supply chains and wider operating environment. Recognising the complexity and sensitivity of modern slavery, this guidance uses a risk-based approach to help organizations understand the risk of modern slavery, use and build appropriate leverage, to manage and reduce this risk as part of their legal and non-legal frameworks, and go beyond their legal and statutory duties.

This risk management involves the systematic application of policies, procedures and practices to the activities of communicating and consulting, establishing the context and assessing, responding, monitoring, reviewing, recording and reporting the risk of modern slavery. It should be understood in the context of the adverse impact on people and on the organizations.

Central to risk management is the risk assessment ([clause 5](#)), which identifies, assesses and evaluates the risk of modern slavery in the organization's activities and its supply chain. The risk assessment forms part of due diligence and informs further action (including due diligence steps to mitigate, prevent and account for modern slavery). Due diligence can be undertaken at strategic levels (for example changing payment terms in contracts to ensure suppliers can pay workers timely) and operational levels (ensuring a specific supplier pays their workers timely), see [Figure 1](#). The information, observations and experiences gathered in the due diligence and other risk assurance activities should feed back into future risk assessments and other risk management activities such as setting the modern slavery policy.

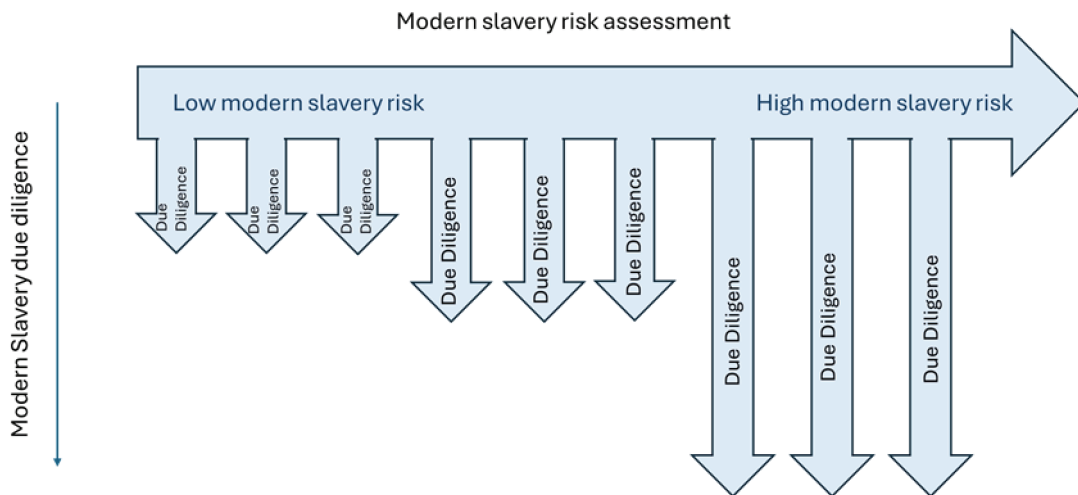


**Figure 1 — Modern slavery risk assessment and due diligence**

Modern slavery can be used to cover a set of specific harms, including forced labour, debt bondage, forced marriage, slavery and slavery-like practices, organ harvesting, human trafficking and the worst forms of child labour. Modern slavery focuses on commonalities across these harms and refers to situations of exploitation that a person cannot refuse or leave because of threats, violence, coercion, deception, and/or abuse of power. [Figure 2](#) illustrates prevalent forms of modern slavery.

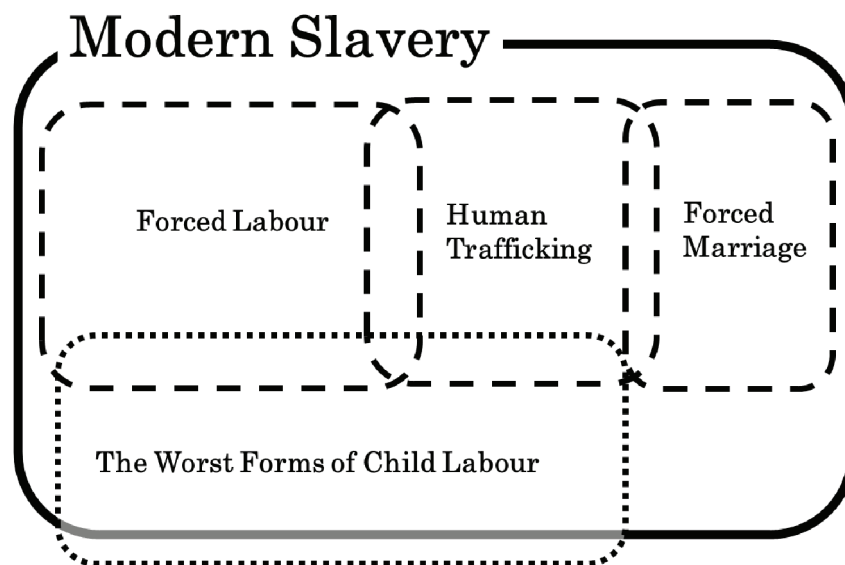


**Figure 2 — What constitutes modern slavery**

Modern slavery practices sit at the extreme end of a continuum of exploitation, ranging from “decent work” to severe forms of labour exploitation, involving poor working and living conditions which harm human dignity. It is a serious violation of people’s fundamental human and labour rights. This guidance is informed by the UN Guiding Principles on Business and Human Rights (UNGPs), the International Bill of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and United Nations Sustainable Development Goals (SDGs). It also acknowledges international contributions such as the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. It aims to help organizations develop and implement good practices to address and reduce the risk of modern slavery and related issues.

**NOTE 1** The International Labour Organization (ILO) defines “decent work” as the aspirations of people in their working lives, involving opportunities for work that is productive and delivers a fair income, security in the workplace and social protection for families, better prospects for personal development and social integration, freedom for people to express their concerns, organize and participate in the decisions that affect their lives and equality of opportunity and treatment for all women and men.

**NOTE 2** The UN Guiding Principles on Business and Human Rights (UNGPs), endorsed by the UN Human Rights Council in 2011, provide three pillars for preventing and addressing the risk of adverse impacts on human rights linked to business activity. These are: the state's duty to protect human rights; the corporate responsibility to respect human rights; and the access to remedy for victims of business-related abuses.

Forms of modern slavery such as human trafficking are criminal acts in virtually all jurisdictions. Any organization engaged in such acts and benefiting financially from them can have individual and/or organizational criminal liability under relevant criminal statutes.

Human trafficking is also an underlying, or predicate, offence for the separate and distinct crime of money laundering. This further increases the risk of criminal liability for individuals and organizations engaged in and/or benefitting from human trafficking.

An organization should need to take appropriate action in response to criminal liability, including reporting to law enforcement, to ensure that it complies with relevant laws and regulations.

This document provides practical guidance, that exceeds minimum standards, for implementation and direction for improvement enabling organizations to demonstrate good practice and high-level achievements.



- is true to its purpose
- performs as required;
- generates value for stakeholders;

- remains in alignment with its policies and relevant stakeholder expectations.

**Responsible stewardship** — The organization:

- makes use of resources in a responsible manner;
- effectively balances positive and negative impacts;
- considers the global context and takes into account international conventions;
- ensures its contribution to sustainable development;
- engenders the trust and confidence of the communities within which it operates, and beyond.

**Ethical behaviour** — The organization behaves in accordance with accepted principles of right or good conduct in the context of a particular situation and in a manner consistent with international norms of behaviour, including demonstrating:

- an ethical culture;
- accountability through accurate and timely reporting on its performance and stewardship of resources;
- fairness in the treatment of, and engagement with interested parties;
- integrity and transparency in fulfilling its obligations, and commitments;
- competence and probity in the manner in which it makes decisions.



# Managing the risk of modern slavery: Guidance for the prevention, identification and response to human trafficking and forced labour

## 1 Scope

This document provides organizations with guidance for managing the risk of modern slavery, including preventing, identifying, responding, mitigating, remediating, and reporting modern slavery in their operations, supply chains and their wider operating environment.

This guidance is generic and intended for all organizations regardless of type, size and nature of activity, and whether in the public, private or not-for-profit sectors, and public-private partnerships.

## 2 Normative references

There are no normative references in this document.

## 3 Terms and definitions

For the purposes of this Standard, the following terms and definitions apply.

### 3.1 bribery

offering, promising, giving, accepting or soliciting of an undue advantage of any value (which can be financial or non-financial), directly or indirectly, and irrespective of location(s), in violation of applicable law, as an inducement or reward for a person acting or refraining from acting in relation to the performance of that person's duties

Note 1 to entry: The above is a generic definition. The meaning of the term "bribery" is as defined by the anti-bribery law applicable to the *organization* ([3.11](#)) and by the anti-bribery management system designed by the organization.

[SOURCE: ISO 37001:2025, 3.1]

### 3.2 business associate

third party with whom the *organization* ([3.11](#)) has, or plans to establish a business relationship

Note 1 to entry: This includes any party whether a corporate body or an individual, including but not limited to franchisees, suppliers, outsourced services, partnerships, and purchasing agents who have a contractual relationship with the organization.

[SOURCE: ISO 37001:2016, 3.26, note 1 to entry amended, note 2 deleted]

### 3.3 compliance function

person or group of persons with responsibility and authority for the operation of the compliance management system

Note 1 to entry: Preferably one individual will be assigned to the oversight of the compliance management system.

[SOURCE: ISO 37301:2021, 3.23]

## 3.4

**compliance obligations**

requirements that an *organization* (3.11) mandatorily has to comply with as well as those that an organization voluntarily chooses to comply with

Note 1 to entry: Requirements that an organization mandatorily must comply with can include: laws and regulations; permits, licences or other forms of authorization; orders, rules or guidance issued by regulatory agencies; judgments of courts or administrative tribunals; treaties, conventions and protocols.

Note 2 to entry: Requirements that an organization voluntarily chooses to comply with can include: agreements with community groups or non-governmental organizations; agreements with public authorities and customers; organizational requirements, such as policies and procedures; voluntary principles or codes of practice; voluntary labelling or environmental commitments; obligations arising under contractual arrangements with the organization; relevant organizational and industry standards.

[SOURCE: ISO 37301:2021, 3.25, modified to add Notes to entry]

## 3.5

**contractor**

external party providing services to the *organization* (3.11) in accordance with agreed specifications, terms and conditions

Note 1 to entry: a contractor and supplier are types of *business associate* (3.2).

## 3.6

**downstream**

handling, processes, movement, use and disposal of goods and services when no longer in the custody of the *organization* (3.11) in the supply chain

[SOURCE: ISO 28001:2007, 3.6, modified to include 'services']

## 3.7

**due diligence**

process through which *organizations* (3.11) proactively identify, assess, prevent, mitigate and account for how they address their actual and potential adverse impacts as an integral part of decision-making and *risk* (3.12) management

Note 1 to entry: The process of due diligence should be iterative, proactive and comprehensive to identify and manage actual and potential impacts

Note 2 to entry: This process should consider negative social, environmental and economic impacts of an organization's decisions and activities over the entire life cycle of a project or organizational activity, with the aim of avoiding and mitigating negative impacts.

Note 3 to entry: In developing this definition and notes, the UNGPs, ISO 26000:2010 and ISO 20400:2017 were considered in the context of modern slavery.

[SOURCE: ISO 20400:2017, 3.3, Notes to entry added.]

## 3.8

**governing body**

person or group of people who have ultimate accountability for the whole *organization* (3.11)

Note 1 to entry: Every organizational entity has one governing body, whether or not it is explicitly established. When the organization is not an organizational entity, the term governing group is applicable where "governing body" is used throughout this document.

Note 2 to entry: A governing body can be explicitly established in a number of formats including, but not limited to, a board of directors, supervisory board, sole director, joint and several directors, or trustees.

Note 3 to entry: ISO management system standards make reference to the term "*top management*" (3.17) to describe a role that, depending on the standard and organizational context, reports to, and is held accountable by, the governing body.

[SOURCE: ISO 37000, 2021, 3.3.4]

### 3.9

#### **intragroup**

transactions and relationships occurring between *organizations* (3.11) within a single corporate group or organization.

Note 1 to entry: Transactions can include dealings between a parent company and its subsidiaries and affiliates, e.g. a majority-owned joint venture, or between different subsidiaries and affiliates within the same group.

### 3.10

#### **listed corporation**

*organization* (3.11) which has securities listed on one or more stock exchanges

Note 1 to entry: Subject to relevant listing rules and requirements and securities laws which includes additional obligations on corporate governance, internal controls, third party relationships and reporting.

### 3.11

#### **organization**

person or group of people that has its own functions with responsibilities, authorities and relationships to achieve its objectives

Note 1 to entry: The concept of organization includes, but is not limited to, sole-trader, company, corporation, firm, enterprise, authority, partnership, charity or institution, or part or combination thereof, whether incorporated or not, public or private.

Note 2 to entry: If the organization is part of a larger entity, the term “organization” refers only to the part of the larger entity that is within the scope of the compliance management system.

[SOURCE: ISO 37301:2021, 3.1]

### 3.12

#### **risk**

effect of uncertainty on objectives

Note 1 to entry: An effect is a deviation from the expected. It can be positive, negative or both, and can address, create or result in opportunities and threats.

Note 2 to entry: Objectives can have different aspects and categories and can be applied at different levels.

Note 3 to entry: Risk is usually expressed in terms of risk sources, potential events, their consequences and their likelihood.

Note 4 to entry: In this document, modern slavery risk is understood as risks to *interested parties* (3.13), most acutely people and risks to the *organization* (3.11).

[SOURCE: ISO 31000:2018, modified new note 4 to entry added]

### 3.13

#### **interested party (preferred term)**

#### **stakeholder (admitted term)**

person or *organization* (3.11) that can affect, be affected by, or perceive itself to be affected by a decision or activity

[SOURCE: ISO 37301:2021, 3.2]

### 3.14

#### **subcontractor**

*organization* (3.11) or individual contracted by the *supplier* (3.15) to perform a specific part of a contract

[SOURCE: ISO 20400:2017, 3.29]

### 3.15

#### **supplier**

*organization* ([3.11](#)) that provides goods or services

Note 1 to entry: a *contractor* ([3.5](#)) and supplier are types of *business associate* ([3.2](#)).

[SOURCE: ISO 20400:2017, 3.30]

### 3.16

#### **supply chain**

direct and indirect relationship of *organizations* ([3.11](#)), people, processes, logistics, information, technology and resources engaged in activities and creating value from the sourcing of resources through the delivery of products or services, which can span across multiple tiers

Note 1 to entry: The supply chain might include vendors, *subcontractors* ([3.14](#)), manufacturing facilities, logistics providers, financial services, internal distribution centres, distributors, wholesalers and other entities that lead to the end user.

Note 2 to entry: Supply chain includes *upstream* ([3.18](#)) and *downstream* ([3.6](#))

[SOURCE: ISO 18788:2015, 3.71 – modified]

### 3.17

#### **top management**

person or group of people who directs and controls an *organization* ([3.11](#)) at the highest level

[SOURCE: ISO 37301:2021, 3.3 modified – Notes to entry deleted]

### 3.18

#### **upstream**

handling, processing and movements of goods and services that occur before the *organization* ([3.11](#)) in the *supply chain* ([3.14](#)) takes custody of the goods and services

Note 1 to entry: Custody should be interpreted not only in a narrow legal meaning.

[SOURCE: ISO 28001:2007, 3.27 modified to include ‘goods and services’ and to include note to entry]

### 3.19

#### **worker**

person performing work or work-related activities that are under the direct or indirect oversight of the *organization* ([3.11](#))

Note 1 to entry: Persons perform work or work-related activities under various arrangements, paid or unpaid, such as regularly or temporarily, intermittently or seasonally, casually or on a part-time basis.

Note 2 to entry: Workers can include *top management* ([3.17](#)), managerial and non-managerial persons.

Note 3 to entry: The work or work-related activities performed under the oversight of the organization may be performed by workers employed by the organization, workers of external providers (*contractors* ([3.5](#)), sub-providers), individuals, agency workers, and by other persons to the extent the organization shares oversight over their work or work-related activities, according to the context of the organization.

[SOURCE: ISO 31030:2021, 3.22 – modified by changing “control” to “oversight” in the definition and Note to entry 3]

### 3.20

#### **human trafficking**

recruitment, transportation, transfer, harbouring or receipt of persons, by compelling or coercing a person for the purpose of exploitation

Note 1 to entry: Human trafficking includes recruitment, transportation, transfer, harbouring or receipt of persons, 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.

Note 2 to entry: Human trafficking can include the exploitation of persons for the purposes of forced labour, sexual exploitation, forced criminality, forced begging, forced marriage, debt bondage, servitude, domestic servitude as well as trafficking for the purpose of exploitation of surrogacies, organ removal, and slavery or practices similar to slavery.

[SOURCE: UN Convention against Transnational Organised Crime and its Protocols, Article 3 (a), note 2 to entry added]

### 3.21

#### **forced labour**

work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily

Note 1 to entry: work or services can be exacted through the use of violence or intimidation, or through more subtle means such as deceit, fraud, accumulated debt, retention of identity papers or threats of denunciation to immigration authorities.

Note 2 to entry: the term compulsory labour is sometimes used to refer to forced labour.

[SOURCE: ILO Forced Labour Convention, 1930 (No. 29), notes to entry added]

### 3.22

#### **modern slavery**

work, service or act which is exacted from a person or group of persons for personal or commercial gain who cannot refuse or leave

Note 1 to entry: “Cannot refuse or leave”, can be understood to mean the inability to leave without detriment or harm to oneself or others.

Note 2 to entry: In this document, modern slavery is an umbrella term that refers to situations of exploitation. Examples of persons being unable to “refuse or leave” includes the threat or use of force, coercion, abduction, fraud, deception, abuse of power or vulnerability, or giving or receiving payment or benefit to a person to achieve the consent of another person who has control of the victim.

Note 3 to entry: Examples of modern slavery include human trafficking, forced labour, worst forms of child labour, forced marriage, slavery and slavery-like practices.

Note 4 to entry: The term “modern” slavery derives from global conventions such as the UN Slavery Convention in contrast to “historical” views of slavery. Slavery and slavery-like practices are defined in the 1926 Slavery Convention as the status or condition of a person over whom any or all of the powers attaching to the right of ownership are exercised. In a later treaty, states agreed that there are also certain “slavery-like practices” such as debt bondage, forced or servile marriage, sale or exploitation of children (including in armed conflict), and descent-based slavery.

### 3.23

#### **child labour**

work that deprives children of their childhood, their potential and their dignity, and that is harmful to their physical and mental development

Note 1 to entry: Child labour is internationally and legally recognized by the descriptions provided by ILO Convention 138 and 182.

Note 2 to entry: Child labour includes the worst forms of child labour.

Note 3 to entry: Work performed by children under 15 and interferes with compulsory education can be considered child labour if the work deprives them of enrolling and/or attending school regularly, or affects their performing negatively due to the nature and/or effect of work.

Note 4 to entry: Child labour is differentiated from child work or light work done by a child under oversight.

[SOURCE: ISO 34101-2:2019, 3.5 – inclusion of Notes to entry]

**3.24****worst forms of child labour**

most harmful forms of *child labour* (3.23)

Note 1 to entry: The ILO worst forms of child labour convention (ILO convention 182) specifies, worst forms of child labour to include:

- all forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom and forced or compulsory labour, including forced or compulsory recruitment of children for use in armed conflict;
- the use, procuring or offering of a child for prostitution, for the production of pornography or for pornographic performances;
- the use, procuring or offering of a child for illicit activities, in particular for the production and trafficking of drugs as defined in the relevant international treaties;
- work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children (hazardous child labour or hazardous work).

[SOURCE: ISO 34101-2:2019(en), 3.35]

**4 Context of the organization****4.1 General**

The organization's action against modern slavery can be driven by many factors. It is important to understand these factors as they will affect the implementation and extent of action.

Examples of driving factors include:

- 1) the organization's values;
- 2) legal and regulatory compliance: adherence to modern slavery standards and norms; avoidance of financial and non-financial non-compliance costs; due diligence requirements and non-legal norms and mechanisms;
- 3) investment: including divestment and responding to investors' expectations (e.g. supporting responsible return on investment);
- 4) stakeholder expectations: responding to increasing stakeholder expectations to take account of modern slavery risk (e.g. workers, potential victims or vulnerable groups, investors, customers and consumers, and civil-society groups);
- 5) business reputation (both positive and negative considerations);
- 6) business opportunities – including denial of market access;
- 7) pressure from other organizations in the supply chain.

**4.2 Understanding the organization and its context**

The organization should define and document the context in which it operates, including its supply chain, subcontractors and business associates.

The external context refers to factors that are outside the organization but related to the management of modern slavery risk, which can include:

- a) external stakeholders: such as businesses, civil society organizations, state actors, regulatory bodies, local government, the public, communities of interest, press and media, special interest groups, trade unions and employer organizations, and their expectations regarding the management of modern slavery risk;