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17 **Authors in order:**

18 **1. Mr Yazan Alzoubi* (corresponding author)**

19 University of Leeds, School of Civil Engineering, United Kingdom. Email: cn18ymys@leeds.ac.uk

20 **2. Prof Dr Giorgio Locatelli**

21 Politecnico di Milano, School of Management, Italy. Email: Giorgio.Locatelli@Polimi.it

22 **3. Dr Tristano Sainati**

23 BI Norwegian Business School, Department of Leadership and Organizational Behavior, Norway.

24 Email: tristano.sainati@bi.no

25

26 **Turning a Blind Eye: Ignoring Modern Slavery in the Race to**
27 **Construction Project Completion**

28

29 **Abstract**

30 Modern slavery is an illegal and unethical phenomenon affecting more than 40 million victims worldwide, with
31 many of them employed in construction. This article aims to investigate why modern slavery continues to exist
32 on construction sites managed by companies that have pledged to fight it. Primary data were collected using
33 semi-structured interviews with 22 experts working in construction companies in three OECD countries (UK,
34 Australia, and Switzerland) and analyzed using inductive thematic analysis. The construction companies were
35 the unit of analysis, and their managers were the primary source of information. The results present the
36 mechanisms that explain the difference between the official anti-modern slavery statements of
37 construction companies and the empirical observations on construction sites. The primary mechanisms
38 are a lack of awareness, training, response, and responsibility, as well as alternative priorities. The results further
39 show the role and importance of reporting cases of modern slavery in addressing it. The risk areas of modern
40 slavery in construction projects, which include the lower tiers of subcontracting and the supply chains of
41 construction materials, are identified. Furthermore, the article discusses the reasons behind the trivialization of
42 modern slavery in construction companies: the presence of alternative priorities, the fear of reputational damage,
43 blame-shifting, and minimizing the problem. Finally, we propose recommendations for construction companies

44 and managers to help address modern slavery and offer areas for future research. This article presents two
45 key novel contributions. First, we discovered a disconnection between construction companies' official
46 anti-modern slavery statements and the reality on construction sites. Second, we identified the reasons
47 behind this disconnection.

48 **Keywords:** Dark side, Ethics, Labor exploitation, Social sustainability, Health and safety,
49 Organizational issues, Labor and personnel issues

50

51 **Practical Applications**

52 Due to its low profit margins and project time constraints, the construction sector is plagued by unethical
53 and illegal practices, including modern slavery. Modern slavery can result in reputational damage,
54 financial repercussions from legal penalties, and loss of trust and opportunities among stakeholders.
55 Therefore, construction companies and employees must be better informed about the ethical, legal, and
56 economic implications of modern slavery, and construction companies must implement stricter
57 regulations to address modern slavery. They should provide continuous and mandatory training to all
58 employees, conduct regular site audits for laborers, raise awareness through posters and social media,
59 and educate employees about reporting. Modern slavery should be addressed not only for ethical reasons
60 but also for the quality and sustainability of construction projects. Finally, addressing modern slavery
61 protects the reputation of construction companies and professionals and, most importantly, safeguards
62 laborers' dignity, health, safety, and well-being.

63 **Introduction**

64 Modern slavery is an illegal and unethical phenomenon (Crane, 2013), negatively affecting the victims'
65 physical, mental, and psychological health (Sabella, 2011; Such et al., 2020; Wright et al., 2020) and
66 the reputation of the involved companies (Gold et al., 2015; Kidd & Manthorpe, 2017; New, 2015;
67 Yagci Sokat & Altay, 2023). Modern slavery is receiving increasing attention from scholars in different
68 sectors, including agriculture (Davies, 2019; Scaturro, 2021), manufacturing (Stevenson & Cole, 2018),
69 and fishing (Stringer et al., 2022).

70 Construction management journals have a long history of publications on important topics relevant to
71 modern slavery, such as ethics (Bowen et al., 2007; Halder & Batra, 2024; Mukumbwa & Muya, 2013),
72 social sustainability (Kordi et al., 2021; Valdes-Vasquez & Klotz, 2013), well-being (Kotera et al., 2020;
73 Sunindijo & Kamardeen, 2017), and human resource management (Gurmu & Ongkowijoyo, 2020;
74 Rajhans & Bhavsar, 2023). However, modern slavery has been scarcely studied in construction and
75 project management journals, except for studies by Alzoubi et al. (2023a, 2023b) and Locatelli et al.
76 (2022).

77 Modern slavery is an increasingly relevant and prevalent issue in construction (Alzoubi et al., 2023a).
78 Construction companies rely on complex supply chains that could involve unethical or illegal practices,
79 including modern slavery (Trautrimis et al., 2021). Therefore, it is essential to emphasize the importance
80 of ethical procurement, sustainable sourcing, and due diligence in construction projects, in addition to
81 the urgent need for training, raising awareness, and preventive measures to address modern slavery.

82 In the last two decades, anti-modern slavery legislation has been issued (Wilhelm et al., 2020; Wray-
83 Bliss & Michelson, 2022); including the California Transparency in Supply Chains Act in 2012
84 (LeBaron et al., 2017), the UK Modern Slavery Act in 2015 (Home Office, 2014), the Corporate Duty
85 of Vigilance Law in France in 2017 (Wilhelm et al., 2020), and the Australian Modern Slavery Act in
86 2018 (Australian Government, 2018). Such legislation pushes organizations to develop anti-modern
87 slavery statements, which explain their strategies to ensure that modern slavery does not occur in their
88 organizations (Wilhelm et al., 2020). Many large construction companies have developed their official
89 anti-modern slavery statements (Jones & Comfort, 2022). Nevertheless, modern slaves can still be found
90 on the construction sites of these companies, usually employed by subcontractors (Alzoubi et al., 2023a).

91 Therefore, there is a disconnection between the official anti-modern slavery statements of construction
92 companies and the on-site reality. Accordingly, the aim of this article is to investigate why modern slavery
93 still exists on construction sites managed by companies that pledged to fight it. The research question (RQ)
94 is as follows:

95 *RQ) What mechanisms explain the difference between the official anti-modern slavery*
96 *statements of construction companies and the empirical observations on construction sites?*

97 The remainder of this article provides a brief overview of the current literature on modern slavery in
98 general and its presence in construction projects. Next, the methodology is presented, encompassing the
99 rationale for the research design and the process of data collection and analysis selected for this study.
100 Subsequently, the results of this study are presented and discussed. Finally, we present a research agenda
101 proposing areas for future research and conclude the article by highlighting the main takeaways.

102

103 **Literature Review**

104 **Modern Slavery – Background**

105 Modern slavery is “*the status or condition of a person over whom any or all of the powers attaching to*
106 *the right of ownership are exercised*” (Slavery Convention, 1926, p. 16). It is an umbrella term
107 (Carrington et al., 2021; Nolan & Bott, 2018; Rioux et al., 2020) that represents the severest or most
108 heinous forms of labor exploitation (Caruana et al., 2021; Wray-Bliss & Michelson, 2022). Modern
109 slavery refers to conditions in which individuals are subjected to the exercise of “power” and
110 “ownership” by another person (Slavery Convention, 1926), who is sometimes known as the
111 “perpetrator.” The term “modern slavery” should be understood as an overarching term that refers to a
112 combination of various forms of exploitation, each with unique characteristics but all sharing the
113 common element of severe violation of human rights and dignity for personal or commercial gain (Bales
114 et al., 2011).

115 Modern slavery affects individuals who a) are employed and forced to work under some threat, b) are
116 subject to forms of control and intimidation by their employers (perpetrators), c) are categorically used
117 as a commodity, and d) have some restriction placed on their movement (Crane, 2013; Flynn, 2019;

118 Wray-Bliss & Michelson, 2022). Modern slavery includes several forms with the main ones being
119 human trafficking, forced labor, sex trafficking, and debt bondage (Alzoubi et al., 2023a).

120 1) **Human trafficking:** It involves the “*recruitment, transportation, transfer, harbouring or receipt of*
121 *persons, by means of the threat or use of force or other forms of coercion [...] for the purpose of*
122 *exploitation*” (United Nations, 2000, p. 2). The victims of human trafficking are often forced into
123 exploitative practices such as forced labor and sexual exploitation (Emberson, 2019).

124 2) **Forced labor:** In forced labor, victims are coerced to work against their will, often under the threat
125 of punishment (ILO, 1930). Forced labor can occur in several industries, in which victims are
126 subjected to poor working and living conditions, restricted freedom, and no control over their
127 employment rights (Bales et al., 2011).

128 3) **Debt bondage:** It occurs when a person is forced to work to repay a debt or loan to their perpetrators
129 and is unable to leave until the debt is paid (Sabella, 2011). The loan repayment terms are often
130 exploitative, unclear, unfair, or changing, with the value of work done by the victim significantly
131 outweighing the original sum of the debt, often trapping victims to keep working for their
132 slaveholders (Wallis, 2017).

133 4) **Sex trafficking:** It involves individuals (often young females) being coerced, deceived, forced, and
134 threatened physically and emotionally into commercial sex acts against their will (Bakirci, 2007).

135 Modern slaves receive low wages (compared to the market benchmark) that, together with other
136 contextual factors, make their standard of living unsustainable (Han et al., 2022; Islam & Van Staden,
137 2022). It is deeply troubling that at present, many people continue to be subjected to physical and mental
138 abuse by their perpetrators; according to several studies, this is a widespread issue (Bales et al., 2011;
139 Wallis, 2017). The latest estimates suggest that more than 40 million people live in modern slavery
140 worldwide (Alzoubi et al., 2023a; Banerjee, 2020; Landman & Silverman, 2019). Moreover, it is even
141 more concerning that due to the COVID-19 pandemic and the resulting global economic crisis, the
142 number of cases of modern slavery is predicted to increase (Evans et al., 2022). This grave injustice
143 requires the attention and action of scholars and organizations.

144 Millions of individuals worldwide live in extreme poverty, a phenomenon that according to the United
145 Nations represents the primary cause of modern slavery (Han et al., 2022; Rassam, 2005). The reasons
146 that enhance the likelihood of individuals falling into modern slavery include corruption, war, and an
147 oppressive and discriminatory social culture (Sabella, 2011; Such et al., 2020). Moreover, uneducated
148 individuals are often unaware of the risks associated with modern slavery (Han et al., 2022). Modern
149 slavery is a worldwide issue: it is not confined only to the Global South countries, which are often
150 characterized by weak job security and welfare, but also affects the Global North countries (Han et al.,
151 2022; Stevenson & Cole, 2018), such as the UK (Bales et al., 2015; Craig, 2017; Jones & Comfort,
152 2022) and Australia (Christ & Burritt, 2021; McGaughey, 2021).

153 Although no definite indicators show that an individual is a victim of modern slavery, general signs can
154 be identified, as listed in Table 1.

155

156

[Table 1 here]

157

158 **Modern Slavery in Construction Projects**

159 The complexity of construction projects, combined with their labor-intensive nature (Schoultz et al.,
160 2023), creates a fertile ground for exploitative and unfair practices; thus, the construction sector is one
161 of the sectors most exposed to modern slavery (Alzoubi et al., 2023a; Cockbain & Brayley-Morris, 2018;
162 Dodd et al., 2022; Gutierrez-Huerter O et al., 2021; Jones & Comfort, 2022; Liu et al., 2022; Trautrim
163 et al., 2021), with an estimated 18% of modern slavery victims worldwide (Australian Human Rights
164 Commission, 2020). During different development stages of construction projects, temporary
165 subcontractors are hired and terminated as they often switch jobs (Trautrim et al., 2021). Additionally,
166 numerous workers may be required throughout the project's life cycle, most of whom are recruited from
167 different subcontractors and employment agencies. Consequently, construction site workers may change
168 daily, making it challenging to identify cases of modern slavery (Crates, 2022).

169 Modern slavery in construction projects encompasses a range of exploitative practices that include
170 forced labor, debt bondage, and human trafficking (Alzoubi et al., 2023a, 2023b). These practices
171 manifest in various forms, such as laborers being coerced or forced to work under physical and mental

172 violence (Brookes et al., 2020), receiving minimum or no salary (Gutierrez-Huerter O et al., 2021), and
173 having their freedom of movement restricted, for instance, through the confiscation of personal
174 documents, such as passports (Jones & Comfort, 2022). Additionally, situations in which laborers are
175 indebted to recruiters and are working to pay off unrealistic, unethical, and illegal high recruitment fees,
176 are very common (Alzoubi et al., 2023b).

177 Due to the complex nature of the construction sector with a complex network of subcontractors and
178 suppliers, the transparency and visibility of occurrences in the lower contracting tiers of construction
179 supply chains are limited (Gutierrez-Huerter O et al., 2021; Russell et al., 2018; Trautrimis et al., 2021)
180 and hence create risk and fertile ground for modern slavery practices, often hidden in plain sight (Gold
181 et al., 2015; Stevenson & Cole, 2018). Moreover, construction projects are characterized by tight
182 deadlines (Fordjour et al., 2021), which often leads to a prioritization of cost and time savings over
183 ethics and equality in the workplace (Cicmil & Hodgson, 2006; Fournier & Grey, 2000).

184 Construction projects include several sector-specific drivers of modern slavery:

- 185 • **Time constraints in construction projects:** Because of limited materials or labor shortages, some
186 construction companies tend to disregard recruitment laws and requirements for obtaining labor on-
187 site, leading them to unknowingly facilitate modern slavery (Crates, 2022) to avoid project delays
188 (Liu et al., 2022).
- 189 • **Low profit margins:** The low profit margin characteristic of the construction sector (Greco, 2021)
190 serves as a fundamental driver for companies to adopt cost-saving measures and, in some cases, to
191 cut corners to maximize their profitability (Khan et al., 2020). The economic pressures encourage
192 the use of modern slavery to reduce labor costs by using low-skilled and migrant laborers (Gutierrez-
193 Huerter O et al., 2021), forcing laborers to work overtime without compensation, and providing
194 poor living and working conditions to laborers (Alzoubi et al., 2023a). These unethical and illegal
195 practices occur to meet the demand for low-cost construction, as labor costs represent a significant
196 portion of total project expenditures (Santoso, 2009).
- 197 • **Poor government-enforced regulations:** Construction workers who attempt to enter the sector
198 without fulfilling the legal entry requirements (Crates, 2022), for example, working full-time while
199 on a student visa or overstaying (Liu et al., 2022) are particularly susceptible to modern slavery.

200 Moreover, weak enforcement of laws, lack of political will to address modern slavery in the
201 construction sector (Alzoubi et al., 2023b), and a corrupted environment foster modern slavery.

202 • **High reliance on migrants and low-skilled laborers:** The construction sector relies heavily on
203 migrant and low-skilled labor (Gutierrez-Huerter O et al., 2021). The rights and social protections
204 of these laborers in the host country are often limited, and they often enter into risky employment
205 situations (Alzoubi et al., 2023b). The probability of perpetrators using modern slavery is also
206 increased by the language difficulties of migrant workers (Walsh et al., 2022) or workers being
207 ignorant about their local labor rights (GLAA, 2020), including their pay, terms and conditions of
208 their contracts, breaks, and overtime hours. Consequently, the workers lack options for contesting
209 unjust requests, such as being required to work long hours for lower compensation due to the fear
210 of losing their jobs or facing legal repercussions (Crates, 2022).

211 As suggested by Jones & Comfort (2022), Liu et al. (2022), and Trautrimis et al. (2021), construction
212 companies should improve their monitoring and reporting of modern slavery. Additionally, because
213 many workers are averse to reporting cases of modern slavery for fear of retaliation, techniques such as
214 anonymous phone calls and online reporting are becoming more common (Crane, 2013; Han et al.,
215 2022).

216

217 **Methodology**

218 This article focuses on construction projects because of a) the relevance and prevalence of modern
219 slavery in construction projects (Alzoubi et al., 2023a; Cockbain & Brayley-Morris, 2018; Dodd et al.,
220 2022; Gutierrez-Huerter O et al., 2021; Jones & Comfort, 2022; Trautrimis et al., 2021); b) the relevance
221 of construction projects for the economy; c) the accessibility to secondary data on modern slavery in
222 construction projects, including research articles, government publications, and professional
223 associations reports in different countries, such as the UK (CIOB, 2016, 2018; Cockbain & Brayley-
224 Morris, 2018; Jones & Comfort, 2022; United Kingdom Government, 2023) and Australia (Australian
225 Human Rights Commission, 2020; Dodd et al., 2022; Liu et al., 2022), which helped us become familiar
226 with the approaches that construction companies take to address modern slavery.

227 In this article, we use construction companies as a unit of analysis and the interviewees working for
228 them as the primary source of information. As a combined entity, construction companies exhibit
229 behaviors, make decisions, and hold conflicts. They frequently issue specific statements highlighting
230 the importance of ethics, integrity, and community responsibility. However, when these statements are
231 disconnected from reality, in which the companies engage in or ignore unethical and illegal practices
232 including modern slavery, it is essential to investigate the mechanisms that explain this disconnection.

233

234 **Data Collection**

235 Primary data were collected through semi-structured interviews (Qu & Dumay, 2011) for the following
236 reasons. First, they are an extremely useful method by which the researcher and interviewees can make
237 logical sense and explore complex, sensitive, and evolving topics (Keene et al., 2016; Loosemore et al.,
238 2021). Second, they enable the interviewees to voice their opinions and express their experiences and
239 ideas openly and comprehensively (Kivilä et al., 2017). They also allow the researcher to probe further
240 with specific questions based on the interviewee's responses. Finally, semi-structured interviews allow
241 the researchers to address potential "social desirability bias" (Loosemore & Lim, 2017) when discussing
242 sensitive research topics, such as modern slavery. The researchers can further question interviewees if
243 they suspect that the interviewees provided answers they believed to be socially acceptable instead of
244 sharing their true opinions (Loosemore et al., 2021).

245 The interview questions were developed based on a) a document analysis of modern slavery statements
246 from large construction companies, which allowed us to become familiar with the approaches
247 construction companies undertake to address modern slavery, and b) a review of existing literature on
248 modern slavery in construction projects. The interview agenda encompassed various topics regarding
249 modern slavery in construction projects, as presented in the Appendix.

250 To review the suitability of the interview questions, pilot tests were conducted (Zuofa & Ochieng, 2016)
251 by interviewing two experts on modern slavery. Their feedback was used to refine the interview
252 questions to enhance their understandability and flow. We employed several strategies to ensure the
253 reliability and validity of the interview questions (Yagci Sokat, 2022). Reliability was ensured by using
254 a consistent interview process: each interview was conducted following the same structured guide. To

255 ensure validity, we adopted a triangulation approach across different sources on modern slavery in
256 construction projects, such as organizational documents and published reports (Brookes et al., 2020;
257 CIOB, 2016, 2018; Crates, 2022). Furthermore, participants' responses were continuously compared to
258 identify patterns and inconsistencies. These steps were crucial in ensuring that our data collection
259 methods were both reliable and valid, providing a solid foundation for the data analysis. Due to the
260 topic's sensitivity and it being one of the "uncomfortable topics" (Locatelli et al., 2022), which many
261 individuals dislike discussing, the questions were designed to encourage the interviewees to participate
262 in the interview. Therefore, the questions, shown in the Appendix, do not reflect, suggest, or reference
263 any involvement of the interviewees or their companies in modern slavery.

264 After obtaining full ethical research approval, invitations to participate in the research, along with the
265 participant consent form and interview questions, were sent to 329 experts working in construction
266 companies via LinkedIn messages or email. The initial selection of individuals aimed to identify experts
267 who are likely to possess relevant insights into modern slavery within the construction sector. The
268 selection criteria of the potential participants were as follows:

- 269 • Current position and industry: We targeted experts currently working in various roles in the
270 construction sector, as they are likely to have direct or indirect experience or knowledge about
271 modern slavery in construction projects.
- 272 • Work experience: participants with extensive working experience in the construction sector and
273 those holding positions of influence, such as project managers, construction managers, sustainability
274 and ethics managers, and human resource managers, were preferred, as they are likely to have a
275 deeper understanding and experience of the construction sector labor practices.
- 276 • Geographical and organizational size: We ensured that the sample represented a diverse range of
277 locations and organization sizes to capture a broad range of perspectives on modern slavery in
278 construction projects.

279 Among the recipients, 291 did not respond, and 16 declined to participate. Among those who declined
280 the invitation, the main reasons were that a) they felt uncomfortable speaking about modern slavery (two
281 potential participants "blocked" communication with the researcher who contacted them after receiving

282 the invitation), b) their company did not allow them to participate in the interview, or c) they were not
283 experts on the topic. These statistics show the methodological challenges experienced when dealing with
284 a sensitive topic like modern slavery. Finally, 22 online interviews were conducted between October
285 2022 and May 2023; thus, the response rate was 6.7%. The extremely low response rate indicates a
286 potential self-selection bias (Elston, 2021), where the managers who volunteered may represent a sample
287 with distinct experiences or perspectives within the construction industry that may not be reflective of
288 the broader population. The substantial number of nonrespondents and decliners indicate unexplored
289 views and knowledge within the contacted target population. This bias might have resulted in the
290 exclusion of insights from potential participants with different or nuanced perspectives on modern
291 slavery in construction projects, particularly from individuals reluctant to discuss such a sensitive topic
292 (Locatelli et al., 2022) or whose companies discourage participation in external research. The duration
293 of the interviews varied, ranging from 16 min to 66 min, with an average length of 30 min. To ensure
294 theoretical saturation (Saunders et al., 2018), interviews continued until no new or relevant insights
295 emerged concerning the research question of this study.

296 To determine the participant's understanding of modern slavery, we employed a two-step approach
297 before and during the interview:

- 298 1. **Preliminary screening through LinkedIn profiles:** This allowed us to look for indications of
299 expertise or involvement in areas relevant to labor practices and modern slavery, such as
300 sustainability, corporate social responsibility, ethics, or specific mention of labor rights initiatives.
- 301 2. **Interview questions:** The first interview question tested the participants' understanding of modern
302 slavery. This was an additional way to ensure that the participants had sufficient knowledge to
303 contribute meaningfully to our study.

304 The interviewee sampling was broad to capture diverse perspectives (Manu et al., 2015; Yagci Sokat,
305 2022). The interviewees encompassed various roles and backgrounds and were based primarily in three
306 OECD countries, the UK, Australia, and Switzerland, explicitly working on construction projects. Table
307 2 summarizes the sampling structure of the interviewees.

308

309 [Table 2 here]

310

311 **Data Analysis**

312 After the researcher obtained permission from the 22 interviewees to record the interviews, the
313 interviews were recorded, transcribed, and analyzed using inductive thematic analysis (Braun & Clarke,
314 2006) with the NVivo software. Thematic analysis is a flexible data analysis method allowing for
315 comprehensive data exploration. It enables the comparison of different views from different
316 interviewees, leading to unexpected perceptions (Braun & Clarke, 2006). Moreover, it aids in
317 summarizing essential aspects of large datasets by encouraging the researcher to organize and present
318 the data in a structured manner (King, 2004; Nowell et al., 2017).

319 We followed the thematic data analysis approach outlined by Braun & Clarke (2006), Guest et al. (2012),
320 and Loosemore et al. (2021). First, we read and reviewed the interview transcripts to familiarize
321 ourselves with the collected data. Second, open coding was employed to generate a preliminary list of
322 codes from the collected data. The third stage required identifying repeated patterns from the preliminary
323 code lists relevant to the RQ. Next, we examined how the codes merged to form the main themes
324 connected to the RQ. Subsequently, the evolving themes were revised by seeking additional information
325 to confirm or disprove the initial themes. This process facilitated identifying connections between
326 themes to uncover new patterns. Finally, we identified the final themes, which are presented in the
327 results section.

328

329 **Results**

330 This section presents the results that emerged from the thematic analysis. Specifically, the following
331 main themes are presented: lack of awareness of modern slavery and alternative priorities, lack of
332 training on modern slavery, lack of response and responsibility to address modern slavery, addressing
333 modern slavery in construction companies, and risk areas of modern slavery in construction projects.
334 We have carefully selected the included direct quotes, considering the length of the article.

335

336 **Lack of Awareness of Modern Slavery and Alternative Priorities**

337 Lack of awareness among managers significantly increases the risk of modern slavery in construction
338 companies. Managers 1 and 20 said, “*we need to realize that slavery is not a thing from the history*
339 *books. It is arguably never been more prevalent, and for me, working in the construction industry, after*
340 *domestic services, the construction is the worst area of the UK economy for modern slavery,”* and
341 *“People may have the mindset that [modern slavery] does not happen over here when it does, and it*
342 *happens more often than you think.”* Some managers do not expect to have victims of modern slavery
343 in their company because they pay their employees real living wages. However, Manager 5 argued that
344 *“because you commit to paying the real living wage does not mean to say that it is [...] going to the*
345 *workers themselves [...], exploiters are really clever, and they take away the bank cards.”*

346 Reflecting on a real-case scenario of the lack of awareness, Manager 5 said,

347 *I was delivering some training for site managers, and they all were able to articulate what modern*
348 *slavery was. But when I said to them, have you ever seen anything dodgy happening on your sites*
349 *there and they were all like, oh yes, definitely. And I said, ok, what did you do as a result of that?*
350 *And they said we did not do anything because we were not sure if they were a slave, and if they*
351 *were not, we did not want to cause a fuss. So, for me, they were site managers for a big main*
352 *contractor, and it just made me think, the site manager is the eyes and ears on the ground!*

353 Further examples confirming the lack of awareness are the views of Managers 2 and 19: *“As a project*
354 *manager, if you work for me and for whatever reason I do not like you, I will try to make the most out*
355 *of you [...]. Is it slavery? I do not know,”* and *“I do not think in the UK itself, there is a huge modern*
356 *slavery problem.”* (Manager 19).

357 Several managers mentioned the presence of alternative priorities of companies and managers, and
358 modern slavery is not one of them: *“I think that [modern slavery] is not visible, so it feels a bit like*
359 *climate change [...]. So, especially on construction sites, project managers are under pressure with a*
360 *lot of competing priorities. So, that is their main focus, and everything else gets pushed down the priority*
361 *list”* (Manager 13). Moreover, Manager 16 added, *“people are selfish, and human beings are probably*
362 *the most selfish creatures on the planet. [...] People have their own desires and priorities [...] Not*
363 *everyone, but the people you are talking to do not probably have a lot of time to think about [modern*

364 *slavery*].” Most priorities were related to completing the project on time to avoid project delay: “*when*
365 *you are working in construction, what is important is the end product [...]. The time, the deadline is*
366 *very important for the employers because their credibility depends on the timeline [...], so they are not*
367 *interested in modern-day slavery.*” (Manager 10).

368

369 **Lack of Training on Modern Slavery**

370 Training managers to understand, detect, and respond to cases of modern slavery in construction projects
371 is one of the main ways to address this criminal activity (Alzoubi et al., 2023a; Jones & Comfort, 2022;
372 Liu et al., 2022). As confirmed by Manager 17, “*I think the training is effective in a sense that it makes*
373 *individuals aware [of modern slavery] so people can appreciate the situation and understand and have*
374 *a more sympathetic and compassionate view.*”

375 Based on the personal experience of managers in their company, they believe modern slavery is a crime:
376 “*I think that modern slavery signifies an unhealthy, unethical, and likely unlawful relationship that*
377 *exploits the vulnerable*” (Manager 9). Moreover, Manager 10 added, “*Modern slavery to me is the*
378 *exploitation of another human being, and aside from it being ethically wrong, whatever the context, I*
379 *believe it is a crime against humanity. It is among the severest forms of violence that one person can*
380 *inflict on another.*” Furthermore, Manager 21 articulated that “*Modern slavery in construction projects*
381 *is a bad, complex issue with multiple layers. It is an illegal practice that only serves to hide the true cost*
382 *of construction projects, casting a foggy veil over the true cost of labor, materials, and other factors*
383 *while degrading the rights of the person at the core of the issue.*”

384 However, many managers lack training, as their companies have never given them any: “*I have not*
385 *particularly had any modern slavery training at my employer.*” (Manager 12). Manager 11 added, “*at*
386 *the moment, we have not actually received any training.*” Furthermore, in some cases, the training is
387 done very infrequently, as emphasized by Manager 2: “*This is the first time I am looking at [the online*
388 *training] [...] I think I have done it like ages ago.*”

389 In our analysis of the modern slavery statements available on the official websites of 22 construction
390 organizations, we observed a similar approach to fighting modern slavery. Although each statement is
391 distinct in its wording, they converge to similar thematic elements. These organizations provide a basic

392 definition of modern slavery, emphasize the importance of training employees to fight modern slavery,
393 and mention some mechanisms by which modern slavery can manifest in the construction sector.
394 Notably, the statements often include similar guidance on recognizing signs of modern slavery and
395 procedures for reporting suspected cases of this criminal activity within the construction sector. Table 3
396 further compares what construction companies claim to be doing to address modern slavery and an
397 explanation of the real situation by their managers.

398

399 **[Table 3 here]**

400

401 As affirmed by Managers 2 and 18, the modern slavery training provided by their companies is a “tick-
402 box activity”: *“I have to tick the boxes, and one of the boxes will be to tick the slavery thing,”* and *“I*
403 *would say most training is simply a case of completing it.”* This is because some managers continue to
404 believe that modern slavery is not prevalent and does not affect them.

405 The training is not mandatory nor consistent in some companies: *“there is no mandatory or consistent*
406 *training done internally”* (Manager 1), which also results in managers not knowing the importance or
407 value of such training: *“You have got someone who sits in an office doing the accounts [...], but you*
408 *would struggle to see the value in giving [the training] to certain people.”* (Manager 15). Moreover,
409 Manager 5 added, *“Typically, a lot of people turn up thinking, why is [the training] relevant to me?”*
410 Therefore, to demonstrate the relevance and value of training managers, construction companies should
411 *“make the information more contextualized and specific to the kind of work that employees do [so the*
412 *training] becomes more interesting.”* (Manager 21).

413 On the contrary, very few companies conducted proper training for their managers, and few managers
414 discussed the content of the training, including the length, points discussed, assessment, and frequency
415 of the training. For instance, Manager 6 said that the training conducted by their company is mandatory
416 for everyone and repeated regularly: *“every single staff member has to complete that training every*
417 *year, and I personally monitor the completion rates, follow up directly with our staff to make sure it is*
418 *completed on an annual basis.”*

419 Several companies only have mandatory training for newcomers: “we have a mandatory, modern
420 slavery training, so every employee, when they start with the company, they need to do an online
421 training” (Manager 22). The managers who completed the training said that their companies provided
422 “an online training module” on modern slavery: “It is an e-learning session” (Manager 8), ranging from
423 30 to 45 min, and focusing on the following areas: understanding modern slavery and its causes,
424 identifying warning signs—high working hours, not having the proper ID papers, not having a
425 contract—how to address it, and how it is relevant to companies and their managers. In some instances,
426 to facilitate effective training, real-case studies were used to “make sure there is a practical learning
427 experience.” (Manager 14).

428 After completing the training, some companies assess their managers to test their knowledge and
429 “demonstrate the individual understanding of the policy.” (Manager 17). In most cases, managers were
430 tested using “multiple choice questions, and [employees] needed to answer all those to go through the
431 module.” (Manager 14). Managers were required to score a minimum grade on the test to pass the
432 training module, as described by Manager 8: “it is a pass mark of 80%, and if they score any less than
433 80%, they have to go back [and] take the test again. If they fail again, they have to reset all of the
434 programs.”

435

436 **Lack of Response and Responsibility to Address Modern Slavery**

437 Construction companies showed a lack of response to address modern slavery in terms of the amount of
438 time spent and the availability of resources to check that modern slavery does not exist, which increases
439 the risk of modern slavery: “We have not had the tools to [address modern slavery]. We have not had
440 the resources, or the skill sets internally within the business” (Manager 14). Manager 18 added, “I do
441 not think [companies spend time and resources] at all. There is the very beginning of that [...], but I
442 think very few construction firms are really doing a good job here.” There were different reasons behind
443 the lack of response to address modern slavery. For example, Manager 21 said: “[people] do not have
444 the expertise to dedicate to [check that modern slavery does not exist].”

445 Regular construction site audits by construction companies are essential for finding loopholes and
446 issues, helping identify improvements, and detecting illegal or unethical practices including modern

447 slavery. Managers emphasized that their companies do not undertake audits to check timely and
448 periodically that modern slavery does not exist. For example, Managers 19 and 21 said, “*We do not do*
449 *audits on modern slavery*” and “*We currently do not have any audits at all.*” According to Manager 3,
450 audits do not occur because they can be expensive for the company: “*it has a cost, that has a cost. Not*
451 *every project does it.*”

452 A second reason for avoiding audits is that managers may believe that they are competent in avoiding
453 modern slavery: “*you think things are going well and it is a big company, or it is a well-reputed*
454 *company, so everything is fine, but that is not the case.*” (Manager 10). Manager 18 highlighted the
455 importance of undertaking audits in companies to help address modern slavery: “*audits create a culture*
456 *of complacency [...] so I think audits need to be done regularly [...] so conversations with the workers,*
457 *and understanding whether they are being paid properly? Are they being paid regularly? Are they*
458 *receiving their full entitlements? Are they receiving days off?*” Furthermore, Manager 5 added, “*if you*
459 *are not doing audits, it is about those conversations. It is about somebody going and doing those kinds*
460 *of spot checks with workers.*”

461 All managers stated that their companies have no employees solely responsible for dealing with modern
462 slavery. However, some managers emphasized that not having one is not a negative factor. For instance,
463 Manager 5 stated, “*Modern slavery is something that everybody within an organization needs to know*
464 *about [...] It is like sustainability, isn't it? So ideally, you want sustainability to be embedded within*
465 *your business.*” By contrast, Manager 22 highlighted the importance and usefulness of companies hiring
466 an employee whose sole job responsibility is modern slavery:

467 *It is still a growing area of understanding, and I feel like I could spend my whole job on [modern*
468 *slavery], and I would make a lot more progress [...] in terms of the learning, best practices, putting*
469 *things in place, risk mapping assessments. I still think that there should be a center of excellence*
470 *or real subject matter experts who advise on [modern slavery].*

471

472 **Addressing Modern Slavery in Construction Companies**

473 **Reporting**

474 If a case of modern slavery is suspected within their company, some managers said they would report
475 the perpetrators. For instance, Manager 8 explained, *“We would prevent [the offenders] from working*
476 *for our organization again, but also we would report them to relevant authorities and make sure that*
477 *they would not ever do any work for us in the industry.”* Manager 6 explained the detailed procedure for
478 investigating and reporting a case of modern slavery. First of all, to identify the problem, *“gather the*
479 *evidence and the facts and assess the incident and then understand whether [the organization] caused,*
480 *contributed to, or is directly linked [to the case of modern slavery].”* Second, protect the victim by
481 *“escalating [the case] to the relevant bodies. If it is the police, legal help, border force [...] NGO, or a*
482 *union.”* Next, rectify the issue by *“figuring out how we would best remedy the situation,”* and finally,
483 *“analyze the risk”* to ensure that it does not happen again.

484 Nevertheless, surprisingly, some managers affirmed that no action would be taken if they reported a
485 case of modern slavery in their company:

486 *I can tell you what I think would happen if I raised [a case of modern slavery]; nothing would*
487 *happen. I would be told to ignore it, stop causing trouble, and stop getting involved. There is*
488 *absolutely no reporting protocol to deal with [modern slavery]. It is too hot a topic. Main*
489 *contractors are terrified of dealing with issues like that. Tier one contractors across the UK will*
490 *not deal with it. They will not deal with it! (Manager 9).*

491 *Some of the subcontractors and workers are under so much pressure to get the job completed*
492 *on time that if it meant reporting the problem to any superiors or any line management, then*
493 *the line management is going to put a stop to it or ignore it because that is going to affect their*
494 *output and therefore extend the time and put themselves under more pressure to get the job*
495 *completed on time. (Manager 19).*

496

497 **Risk Areas of Modern Slavery in Construction Projects**

498 The area with the highest risk of modern slavery in construction projects is subcontracting in lower tiers
499 with low-skilled laborers as *“there is less visibility [...] on the policies, the ordinance, and the*

500 *procedures*” (Manager 1). Manager 3 added, *“In construction projects, you will have a huge sort of*
501 *conflict between clients wanting [the work] done quickly, efficiently, cheaply at the same time.”* This
502 puts pressure on the contractors as there is a huge shortage of laborers in construction. Further, because
503 *“people chasing for profit [...] take shortcuts”* (Manager 4), many contractors will not care or pay
504 attention to how they obtain the laborers and whether they are skilled as long as they can perform the
505 work.

506 Therefore, some construction companies address modern slavery differently. For instance, Manager 1
507 stated: *“The main answer that you are going to hear from myself and from other people is in*
508 *prequalification.”* Prequalification is the minimum tool construction companies use to prevent
509 contractors from using modern slaves while working on a construction project. For instance, companies
510 will use the common assessment standard in which contractors must answer questions to meet the
511 minimum standards around fair working practices, wages, right to work, and having a policy on modern
512 slavery.

513 The second risk area of modern slavery in construction projects is the supply chain of construction
514 materials. Manager 1 stated that *“a [risk], which is much more complex [...] would be on [...] raw*
515 *materials.”* In addition, Manager 4 emphasized, *“suppliers remotely providing goods [...] the risk there*
516 *is high, [...] where there tends to be forced labor to produce those goods.”* This is primarily due to the
517 complexity of supply chains and the presence of many tiers, making visibility difficult for managers.

518 Table 4 summarizes the main findings based on the eight interview questions.

519

520 **[Table 4 here]**

521

522 **Discussion**

523 **Lack of Action on Modern Slavery**

524 According to our data, the lack of action by construction companies and managers to address modern
525 slavery is due to several reasons:

- 526 • **Lack of training by construction companies:** Several scholars described the importance of
527 training managers in construction to address modern slavery (Jones & Comfort, 2022; Liu et al.,

2022; Trautrimis et al., 2021). We confirm the findings of previous studies (Alzoubi et al., 2023a; Cockbain & Brayley-Morris, 2018; David & Salter, 2021) that construction companies provide insufficient training to address modern slavery. If construction companies do not train their managers on what modern slavery is, how it occurs, what the signs are, and where it is common, managers will be unable to recognize it or believe in its existence (lack of awareness). Moreover, if managers suspect a case of modern slavery, they will not know how to report it and will, therefore, ignore it (lack of response and responsibility).

- **Lack of awareness among managers:** Raising awareness is important in educating managers to address modern slavery (Jones & Comfort, 2022; Liu et al., 2022; Trautrimis et al., 2021). However, as shown in our results, managers lack awareness regarding modern slavery. Thus, many managers continue to believe that modern slavery is not prevalent although it is estimated that there are more than 40 million modern slaves worldwide (Banerjee, 2020; Landman & Silverman, 2019), including those working on projects (Alzoubi et al., 2023a). Furthermore, some managers believe that there is minimal risk of modern slavery because they pay their laborers a real living wage according to legal standards. However, perpetrators are skilled and have different ways to take away laborers' wages, for example, by taking away their bank cards and not allowing them to control their payments.

- **Lack of response and responsibility:** A lack of response and responsibility by construction companies and managers will result in their being unfamiliar with the strategies to report cases of modern slavery. For instance, most managers emphasized that modern slavery is a sensitive topic to discuss, implying their reluctance and discomfort to openly discuss or address it. Despite official website statements, modern slavery is still a taboo on construction sites. An explanation for this being taboo is that if a manager reports a suspected case of modern slavery, it can cause reputational damage to the company, retaliation by the perpetrator against the manager, or project delays due to the investigation of the incident. Hence, construction companies and managers often avoid discussing modern slavery and leave this topic to their human resources or communications office, which often produces generic and brief statements against modern slavery.

Moreover, consistent construction site audits are important for companies to identify problems, improve on-site conditions, and detect modern slavery. If audits are not performed, the laborers will

556 not understand their rights, and the possibility of them becoming victims of modern slavery will be
557 higher. Furthermore, many construction companies rely on modern slavery standards, which can be
558 beneficial but also have some drawbacks. For example, corruption can occur anywhere, rendering
559 the standards ineffective. Therefore, construction companies should not rely solely on them to
560 prevent modern slavery.

561

562 **Trivializing Modern Slavery in Construction Companies**

563 A key result of our research is that construction companies and managers trivialized the issue of modern
564 slavery, that is, they ignored it or made it less important and relevant. The following mechanisms lead
565 to trivialization:

- 566 • **Alternative priorities:** Most construction companies and managers prioritize factors other than
567 being anti-modern slavery, such as revenue maximization. Managers declared that they were under
568 considerable pressure from their companies to finish projects on time and within budget and
569 specifications. Manager 19 said, *“I think the modern slavery issue in some respects, can be ignored
570 in order to get the job done.”* Moreover, Manager 21 added, *“[modern slavery] is not even on the
571 top 100 priorities [...] and really, their goal and their job description is to deliver a project on time
572 under budget.”* It is clear from these interviews that managers are under considerable pressure when
573 undertaking a project and are focused on the “iron triangle” of finishing the work within the
574 constraints of schedule, budget, and quality. These circumstances compel managers to become
575 “ethically blind” (Palazzo et al., 2012) and neglect ethical aspects, including modern slavery.
- 576 • **Fear of reputational damage:** Managers may fear speaking out or reporting a suspected case of
577 modern slavery due to the reputational damage (Alzoubi et al., 2023a; Brookes et al., 2020) their
578 companies could face, which would have financial implications, including legal penalties and loss
579 of trust and business opportunities. Consequently, companies and managers trivialize the issue and
580 ignore the suspected or reported cases of modern slavery to avoid this potential risk. For example,
581 Manager 9 said, *“If a person thinks there is [modern slavery] and raises it with the line manager,
582 it will not go above that manager, and it will not be dealt with. [...] Nobody is interested in [modern
583 slavery] because it means they have to do something, and it is a hot topic.”*

- 584 • **Blame-shifting:** To avoid responsibility, companies and managers shift the blame for modern
585 slavery to other parties, such as subcontractors or material suppliers. For instance, Manager 9 said,
586 “[modern slavery] is not our problem; it is for the subcontractor to deal with.” In addition, Manager
587 13 said: “It feels like [modern slavery] is not their problem; it is somebody else’s problem [...]”
588 [modern slavery] is not really in their scope, or it does not fit within their role.” Furthermore,
589 Manager 21 said: “[employees’] goal and their job description is to deliver a project on time under
590 budget. Anything outside of that scope, in a way, is not their responsibility.” Hence, managers
591 should develop the mindset that modern slavery is the responsibility of everyone within the
592 company, and companies should teach that to their managers through mandatory training, as they
593 teach health and safety.
- 594 • **Minimizing the modern slavery problem:** Companies and managers minimized the prevalence of
595 modern slavery issues because the companies pay their laborers real living wages: “We pay people
596 properly, and it’s in accordance with all the rules” (Manager 4) or because of a lack of awareness
597 among managers in construction companies: “I do not think [modern slavery] happens probably
598 less than 1% of the time.” (Manager 16).

599

600 **Recommendations**

601 Based on our findings, we offer the following recommendations to construction companies and
602 managers to address modern slavery:

- 603 • The grievance and remediation area of modern slavery is weak. Companies should raise awareness
604 by providing all their managers with mandatory training. Modern slavery topics should be given the
605 same importance and training as health and safety ones. Moreover, companies should improve and
606 repeat the training annually to ensure that managers are informed and aware.
- 607 • Because modern slavery training is often considered a “tick-box activity,” companies should assess
608 managers after completing the training to ensure they have a sufficient understanding of modern
609 slavery, its detection, and reporting, including knowledge of employment rights. Moreover, the
610 training should be repeated if the manager fails the assessment.

- 611 • The training should be customized for the manager’s role so that they are engaged and interested in
612 the training. For instance, companies can use real-life case studies, which can promote managers’
613 engagement and understanding of modern slavery.
- 614 • Companies should have a clear strategy for their managers to report suspected cases of modern
615 slavery in construction projects: Who should be contacted? What should be done? How do you
616 follow up with the case?
- 617 • Companies should teach their managers how to support victims of modern slavery after their
618 treatment so that they can work again. For instance, companies could collaborate to help victims of
619 modern slavery find new jobs.
- 620 • Companies, managers, and academics should promote the relevance and explain the consequences
621 of modern slavery in construction projects and raise awareness through social media platforms.

622

623 **Research Agenda**

624 This section presents a research agenda aimed at highlighting the gaps that require further research in
625 the area of modern slavery in construction projects. Through our research, we identified and clarified
626 two areas for further research: modern slavery in developing countries and the effectiveness of modern
627 slavery training.

628 **Modern Slavery in Developing Countries**

629 The data collected in this research originate exclusively from three OECD member countries (UK,
630 Australia, and Switzerland). The results of our research, mainly highlighting the lack of training,
631 awareness, response, and responsibility by construction companies and managers, as well as the
632 trivialization of modern slavery issues, reflect a critical gap in addressing modern slavery in construction
633 projects in developed countries.

634 However, these issues may manifest differently in developing countries due to varying socioeconomic
635 and cultural reasons (Crane, 2013). In developing countries, the issue of modern slavery is often
636 exacerbated by deeper systemic vulnerabilities, such as higher poverty rates, weaker governance
637 structures, and less rigorous legal frameworks regarding labor rights (Nwosu et al., 2022). This context

638 can lead to a lack of awareness and training on modern slavery issues in the construction sector, not
639 necessarily due to trivialization as found in our research, but as a consequence of limited resources and
640 other essential survival priorities.

641 Therefore, future research should aim to include data from these developing countries to provide a more
642 comprehensive and globally representative understanding of modern slavery in the construction sector.
643 This expansion would offer a deeper exploration of how the dynamics of modern slavery in construction
644 projects vary across different global contexts. Moreover, comparative studies could determine whether
645 the patterns observed in developed countries are valid in developing countries or whether distinct factors
646 come into play.

647 **Effectiveness of Modern Slavery Training**

648 Scholars have consistently highlighted the crucial importance of training as a preventive measure of
649 modern slavery, including in construction projects (Alzoubi et al., 2023a; Stevenson & Cole, 2018;
650 Trautrimis, 2020). These studies highlight training as a critical mechanism for raising awareness and
651 providing individuals with the necessary knowledge to identify and respond to cases of modern slavery
652 in different sectors, including construction. The results of this research further substantiate the
653 significance and importance of training initiatives within construction companies.

654 Despite these insights, the effectiveness of existing training programs in fighting modern slavery
655 remains unclear. This gap highlights the need for a deeper understanding of training effectiveness and
656 calls for rigorous investigation into the design, implementation, and outcomes of training tailored to
657 construction sector employees. Therefore, future research should analyze the elements that constitute
658 effective training programs. It should also assess their effect on the awareness and actions of
659 construction companies and employees regarding modern slavery to ensure that effective strategies to
660 combat modern slavery in the construction sector are established.

661 Moreover, the broader implications of antislavery measures within construction companies require
662 further exploration. This includes an examination of how training initiatives influence company
663 operations, project execution, and overall organizational culture. An equally important avenue for future

664 research involves the comparative analysis of relevant laws and regulations across different countries
665 and sectors. Understanding the legal framework and its enforcement effectiveness could provide
666 invaluable insights into fighting modern slavery in different sectors, including construction.

667 **Conclusions**

668 This article elucidates the present state of the construction sector in dealing with modern slavery. It
669 addresses the lack of information available on the topic in the context of construction projects,
670 emphasizing that although modern slavery is a significant and widespread issue in the sector,
671 construction companies and managers tend to overlook it. Moreover, this article describes the
672 mechanisms that explain the difference between the official anti-modern slavery statements of
673 construction companies and the empirical observations on construction sites.

674 We show that the mechanisms behind this difference are due to the construction companies' lack of
675 training, which leads to a lack of awareness of managers and a lack of response and responsibility to
676 address modern slavery among the construction companies and their managers. Moreover, "alternative
677 priorities" are another reason for the lack of action of construction companies and managers; modern
678 slavery is not one of them. Hence, construction companies and managers trivialize the issue of modern
679 slavery. Furthermore, the results demonstrate the varying responses on the topics of reporting cases of
680 modern slavery and understanding the risk areas of modern slavery in construction projects. Therefore,
681 the authors conclude that much work remains to be done by construction companies and managers to address
682 modern slavery.

683 Construction companies and managers ought to act against modern slavery, perhaps starting from the
684 recommendations provided in this article. The critical time to address modern slavery in construction
685 projects is now, and if construction companies and managers remain complacent, the problem will
686 worsen. This article focuses on modern slavery in construction projects. However, this research is
687 relevant to other project sectors, as modern slavery can occur in other types of projects. Moreover, future
688 research should investigate how construction companies address other dark side topics in projects, such
689 as corruption, money laundering, and sexism.

690

691 **Appendix: Interview questions**

Interview Questions
1. What does modern slavery mean to you?
2. Does your organization provide training for employees on modern slavery? (If yes, how long is the training? How often is it done? Who has to attend the training? What kind of training is it? What are the key points discussed/addressed during the training? How are the employees assessed to ensure understanding of the training?)
3. Which areas within your organization have a higher risk of modern slavery? Why?
4. Is there anyone in your organization whose job description deals with modern slavery? (If yes, who are they? Is it their only job? If not, why?)
5. In your organization, what do you do when selecting contractors to avoid them using modern slavery?
6. What barriers are present to detecting modern slavery on construction sites managed by your organization?
7. How are audits carried out to identify signs of modern slavery in your organization?
8. How would you react to a case of modern slavery in your organization?

692

693 **Data Availability Statement**

694 Some or all data, models, or code that support the findings of this study are available from the
695 corresponding author upon reasonable request.

696

697 **References**

- 698 Alzoubi, Y., Locatelli, G., & Sainati, T. (2023a). Modern Slavery in Projects: A Systematic Literature
699 Review and Research Agenda. *Project Management Journal*, 54(3), 235–252.
700 <https://doi.org/10.1177/87569728221148158>
- 701 Alzoubi, Y., Locatelli, G., & Sainati, T. (2023b). The ugly side of construction: Modern slavery in the
702 2022 FIFA World Cup program. *Construction Management and Economics*, 1–19.
703 <https://doi.org/10.1080/01446193.2023.2269434>
- 704 Australian Government. (2018). *Modern Slavery Act 2018*.
705 <https://www.legislation.gov.au/Details/C2018A00153#:~:text=This%20Act%20requires%20e>
706 [ntities%20based,actions%20to%20address%20those%20risks](https://www.legislation.gov.au/Details/C2018A00153#:~:text=This%20Act%20requires%20entities%20based,actions%20to%20address%20those%20risks).
- 707 Australian Human Rights Commission. (2020). *Property, construction & modern slavery—Practical*
708 *responses for managing risk to people*. [https://policycommons.net/artifacts/3750761/property-](https://policycommons.net/artifacts/3750761/property-construction-modern-slavery/4556689/)
709 [construction-modern-slavery/4556689/](https://policycommons.net/artifacts/3750761/property-construction-modern-slavery/4556689/)
- 710 Bakirci, K. (2007). Child pornography and prostitution: Is this crime or work that should be regulated?
711 *Journal of Financial Crime*, 14(1), 5–11. <https://doi.org/10.1108/13590790710721756>
- 712 Bales, K., Hesketh, O., & Silverman, B. (2015). Modern slavery in the UK: How many victims?
713 *Significance*, 12(3), 16–21. <https://doi.org/10.1111/j.1740-9713.2015.00824.x>
- 714 Bales, K., Trodd, Z., & Williamson, A. (2011). *Modern slavery A Beginner's Guide*. Oneworld
715 publications.
- 716 Banerjee, B. (2020). Modern Slavery Is an Enabling Condition of Global Neoliberal Capitalism:
717 Commentary on Modern Slavery in Business. *Business & Society*, 000765031989847.
718 <https://doi.org/10.1177/0007650319898478>
- 719 Bowen, P., Akintoye, A., Pearl, R., & Edwards, P. J. (2007). Ethical behaviour in the South African
720 construction industry. *Construction Management and Economics*, 25(6), 631–648.
721 <https://doi.org/10.1080/01446190701225707>
- 722 Braun, V., & Clarke, V. (2006). Using thematic analysis in psychology. *Qualitative Research in*
723 *Psychology*, 3(2), 77–101. <https://doi.org/10.1191/1478088706qp063oa>

724 Brookes, N., Glass, J., Castro, A., Locatelli, G., & Oliomogbe, G. (2020). *Eliminating Modern slavery*
725 *from Projects*. Association for Project Management.
726 <https://www.apm.org.uk/media/47794/modern-slavery-final.pdf>

727 Carrington, M., Chatzidakis, A., & Shaw, D. (2021). Consuming Worker Exploitation? Accounts and
728 Justifications for Consumer (In)action to Modern Slavery. *Work, Employment and Society*,
729 35(3), 432–450. <https://doi.org/10.1177/0950017020926372>

730 Caruana, R., Crane, A., Gold, S., & LeBaron, G. (2021). Modern Slavery in Business: The Sad and
731 Sorry State of a Non-Field. *Business & Society*, 60(2), 251–287.
732 <https://doi.org/10.1177/0007650320930417>

733 Christ, K. L., & Burritt, R. L. (2021). Exploring effectiveness of entity actions to eliminate modern
734 slavery risk – Early Australian evidence. *The British Accounting Review*, 101065.
735 <https://doi.org/10.1016/j.bar.2021.101065>

736 Cicmil, S., & Hodgson, D. (2006). New Possibilities for Project Management Theory: A Critical
737 Engagement. *Project Management Journal*, 37(3), 111–122.
738 <https://doi.org/10.1177/875697280603700311>

739 CIOB. (2016). *Building a Fairer System: Tackling Modern slavery in Construction Supply Chains*.
740 Chartered Institute of Building (CIOB). [https://www.ciob.org/industry/research/Building-](https://www.ciob.org/industry/research/Building-Fairer-System-Tackling-modern-slavery-construction-supply-chains)
741 [Fairer-System-Tackling-modern-slavery-construction-supply-chains](https://www.ciob.org/industry/research/Building-Fairer-System-Tackling-modern-slavery-construction-supply-chains)

742 CIOB. (2018). *Construction and the Modern slavery Act: Tackling Exploitation in the UK*. Chartered
743 Institute of Building (CIOB). [https://www.ciob.org/industry/research/State-of-Well-being-](https://www.ciob.org/industry/research/State-of-Well-being-Construction-Industry)
744 [Construction-Industry](https://www.ciob.org/industry/research/State-of-Well-being-Construction-Industry)

745 Cockbain, E., & Brayley-Morris, H. (2018). Human Trafficking and Labour Exploitation in the Casual
746 Construction Industry: An Analysis of Three Major Investigations in the UK Involving Irish
747 Traveller Offending Groups. *Policing: A Journal of Policy and Practice*, 12(2), 129–149.
748 <https://doi.org/10.1093/police/pax032>

749 Craig, G. (2017). The UK’s Modern Slavery Legislation: An Early Assessment of Progress. *Social*
750 *Inclusion*, 5(2), 16–27. <https://doi.org/10.17645/si.v5i2.833>

- 751 Crane, A. (2013). Modern Slavery As A Management Practice: Exploring the Conditions and
752 Capabilities for Human Exploitation. *Academy of Management Review*, 38(1), 49–69.
753 <https://doi.org/10.5465/amr.2011.0145>
- 754 Crates, E. (2022). *Operation Cardinas and Beyond: Addressing exploitation risk in the construction*
755 *sector*. Independent Anti-Slavery Commissioner.
756 <https://www.antislaverycommissioner.co.uk/resources/>
- 757 David, K., & Salter, M. (2021). ‘They Are Here Without Chains, but With Invisible Chains’:
758 Understandings of Modern Slavery Within the New South Wales Settlement Sector. *Social &*
759 *Legal Studies*, 096466392199010. <https://doi.org/10.1177/0964663921990103>
- 760 Davies, J. (2019). From severe to routine labour exploitation: The case of migrant workers in the UK
761 food industry. *Criminology & Criminal Justice*, 19(3), 294–310.
762 <https://doi.org/10.1177/1748895818762264>
- 763 Dodd, T., Guthrie, J., & Dumay, J. (2022). Management controls and modern slavery risks in the
764 building and construction industry: Lessons from an Australian social housing provider. *The*
765 *British Accounting Review*, 101098. <https://doi.org/10.1016/j.bar.2022.101098>
- 766 Elston, D. M. (2021). Participation bias, self-selection bias, and response bias. *Journal of the American*
767 *Academy of Dermatology*, S0190962221011294. <https://doi.org/10.1016/j.jaad.2021.06.025>
- 768 Emberson, M. (2019). *Human Trafficking & Modern Slavery. Introducing the issue and recognizing the*
769 *signs*. Redemptorist Publications. [https://www.amazon.com/Trafficking-Modern-Slavery-](https://www.amazon.com/Trafficking-Modern-Slavery-Introducing-recognising-ebook/dp/B07PHGTBFC)
770 [Introducing-recognising-ebook/dp/B07PHGTBFC](https://www.amazon.com/Trafficking-Modern-Slavery-Introducing-recognising-ebook/dp/B07PHGTBFC)
- 771 Evans, H., Sadhwani, S., Singh, D. N., Robjant, D. K., & Katona, P. C. (2022). Prevalence of complex
772 post-traumatic stress disorder in survivors of human trafficking and modern slavery: A
773 systematic review. *The European Journal of Psychiatry*, 36(2), 94–105.
774 <https://doi.org/10.1016/j.ejpsy.2022.01.005>
- 775 Flynn, A. (2019). Determinants of corporate compliance with modern slavery reporting. *Supply Chain*
776 *Management: An International Journal*, 25(1), 1–16. [https://doi.org/10.1108/SCM-10-2018-](https://doi.org/10.1108/SCM-10-2018-0369)
777 [0369](https://doi.org/10.1108/SCM-10-2018-0369)

778 Fordjour, G. A., Chan, A. P. C., & Tuffour-Kwarteng, L. (2021). Exploring Construction Employees'
779 Perspectives on the Potential Causes of Psychological Health Conditions in the Construction
780 Industry: A Study in Ghana. *International Journal of Construction Education and Research*,
781 17(4), 373–393. <https://doi.org/10.1080/15578771.2020.1804491>

782 Fournier, V., & Grey, C. (2000). At the critical moment: Conditions and prospects for critical
783 management studies. *Human Relations*, Vol. 53 No. 1, pp. 7-32.

784 GLAA. (2020). *Gangmasters & Labour Abuse Authority (GLAA). Labour Exploitation: Spot the Signs*.
785 <https://www.gla.gov.uk/i-am-a/i-use-workers/construction-protocol/>

786 Gold, S., Trautrim, A., & Trodd, Z. (2015). Modern slavery challenges to supply chain management.
787 *Supply Chain Management: An International Journal*, 20(5), 485–494.
788 <https://doi.org/10.1108/SCM-02-2015-0046>

789 Greco, M. (2021). How does open innovation enhance productivity? An exploration in the construction
790 ecosystem. *Technological Forecasting*, 18.

791 Guest, G., MacQueen, K. M., & Namey, E. E. (2012). *Applied Thematic Analysis*. SAGE Publications,
792 Inc. <https://doi.org/10.4135/9781483384436>

793 Gurmu, A. T., & Ongkowijoyo, C. S. (2020). Predicting Construction Labor Productivity Based on
794 Implementation Levels of Human Resource Management Practices. *Journal of Construction*
795 *Engineering and Management*, 146(3), 04019115. [https://doi.org/10.1061/\(ASCE\)CO.1943-](https://doi.org/10.1061/(ASCE)CO.1943-7862.0001775)
796 [7862.0001775](https://doi.org/10.1061/(ASCE)CO.1943-7862.0001775)

797 Gutierrez-Huerter O, G., Gold, S., & Trautrim, A. (2021). Change in Rhetoric but not in Action?
798 Framing of the Ethical Issue of Modern Slavery in a UK Sector at High Risk of Labor
799 Exploitation. *Journal of Business Ethics*. <https://doi.org/10.1007/s10551-021-05013-w>

800 Halder, A., & Batra, S. (2024). Navigating the Ethical Discourse in Construction: A State-of-the-Art
801 Review of Relevant Literature. *Journal of Construction Engineering and Management*, 150(3),
802 03124001. <https://doi.org/10.1061/JCEMD4.COENG-13880>

803 Han, C., Jia, F., Jiang, M., & Chen, L. (2022). Modern slavery in supply chains: A systematic literature
804 review. *International Journal of Logistics Research and Applications*, 1–22.
805 <https://doi.org/10.1080/13675567.2022.2118696>

806 Home Office. (2014). *Modern Slavery Act 2015*. GOV.UK.
807 <https://www.gov.uk/government/collections/modern-slavery-bill>

808 ILO. (1930). *What is forced labour, modern slavery and human trafficking*. International Labour
809 Organization. [https://www.ilo.org/global/topics/forced-labour/definition/lang--
810 en/index.htm#:~:text=The%20Definition%20of%20forced%20labour,offered%20himself%20
811 or%20herself%20voluntarily.%22](https://www.ilo.org/global/topics/forced-labour/definition/lang-en/index.htm#:~:text=The%20Definition%20of%20forced%20labour,offered%20himself%20or%20herself%20voluntarily.%22)

812 Islam, M. A., & Van Staden, C. J. (2022). Modern Slavery Disclosure Regulation and Global Supply
813 Chains: Insights from Stakeholder Narratives on the UK Modern Slavery Act. *Journal of
814 Business Ethics, 180*(2), 455–479. <https://doi.org/10.1007/s10551-021-04878-1>

815 Jones, P., & Comfort, D. (2022). Modern slavery statements and the UK’s largest housebuilding
816 companies: An exploratory research paper. *Property Management*. [https://doi.org/10.1108/PM-
817 06-2021-0043](https://doi.org/10.1108/PM-06-2021-0043)

818 Keene, K., Keating, K., & Ahonen, P. (2016). *The Power of Stories Enriching Program Research and
819 Reporting*. *OPRE Report# 2016-32a*. Office of Planning, Research and Evaluation,
820 Administration for Children and Families, U.S. Department of Health and Human Services.
821 <https://www.jbassoc.com/resource/power-stories-enriching-program-research-reporting/>

822 Khan, A. N., Khan, N. A., & Soomro, M. A. (2020). The Impact of Moral Leadership on Construction
823 Employees’ Psychological Behaviors. *IEEE Transactions on Engineering Management, 1–9*.
824 <https://doi.org/10.1109/TEM.2020.3020371>

825 Kidd, J., & Manthorpe, J. (2017). Modern slavery – the adult safeguarding interface. *The Journal of
826 Adult Protection, 19*(3), 158–166. <https://doi.org/10.1108/JAP-09-2016-0021>

827 King, N. (2004). *Using templates in the thematic analysis of text*. SAGE Publications Ltd.
828 <https://dx.doi.org/10.4135/9781446280119>

829 Kivilä, J., Martinsuo, M., & Vuorinen, L. (2017). Sustainable project management through project
830 control in infrastructure projects. *International Journal of Project Management, 35*(6), 1167–
831 1183. <https://doi.org/10.1016/j.ijproman.2017.02.009>

832 Kordi, N. E., Belayutham, S., & Che Ibrahim, C. K. I. (2021). Mapping of social sustainability attributes
833 to stakeholders' involvement in construction project life cycle. *Construction Management and*
834 *Economics*, 39(6), 513–532. <https://doi.org/10.1080/01446193.2021.1923767>

835 Kotera, Y., Green, P., & Sheffield, D. (2020). Work-life balance of UK construction workers:
836 Relationship with mental health. *Construction Management and Economics*, 38(3), 291–303.
837 <https://doi.org/10.1080/01446193.2019.1625417>

838 Landman, T., & Silverman, B. W. (2019). Globalization and Modern Slavery. *Politics and Governance*,
839 7(4), 275–290. <https://doi.org/10.17645/pag.v7i4.2233>

840 LeBaron, G., Lister, J., & Dauvergne, P. (2017). Governing Global Supply Chain Sustainability through
841 the Ethical Audit Regime. *Globalizations*, 14(6), 958–975.
842 <https://doi.org/10.1080/14747731.2017.1304008>

843 Liu, T., Suprun, E., Stewart, R. A., & Duran, S. (2022). Developing a framework for assessing the
844 readiness of entities in the construction industry in addressing modern slavery. *Sustainable*
845 *Production and Consumption*, 13.

846 Locatelli, G., Konstantinou, E., Geraldi, J., & Sainati, T. (2022). The Dark Side of Projects:
847 Dimensionality, Research Methods, and Agenda. *Project Management Journal*,
848 875697282211039. <https://doi.org/10.1177/87569728221103911>

849 Loosemore, M., Alkilani, S. Z., & Murphy, R. (2021). The institutional drivers of social procurement
850 implementation in Australian construction projects. *International Journal of Project*
851 *Management*, 39(7), 750–761. <https://doi.org/10.1016/j.ijproman.2021.07.002>

852 Loosemore, M., & Lim, B. T. H. (2017). Linking corporate social responsibility and organizational
853 performance in the construction industry. *Construction Management and Economics*, 35(3), 90–
854 105. <https://doi.org/10.1080/01446193.2016.1242762>

855 Manu, E., Ankrah, N., Chinyio, E., & Proverbs, D. (2015). Trust influencing factors in main contractor
856 and subcontractor relationships during projects. *International Journal of Project Management*,
857 33(7), 1495–1508. <https://doi.org/10.1016/j.ijproman.2015.06.006>

858 McGaughey, F. (2021). Behind the scenes: Reporting under Australia's Modern Slavery Act. *Australian*
859 *Journal of Human Rights*, 27(1), 20–39. <https://doi.org/10.1080/1323238X.2021.1962788>

- 860 Mukumbwa, B., & Muya, M. (2013). Ethics in the Construction Industry in Zambia. *International*
861 *Journal of Construction Management*, 13(2), 43–65.
862 <https://doi.org/10.1080/15623599.2013.10773211>
- 863 New, S. J. (2015). Modern slavery and the supply chain: The limits of corporate social responsibility?
864 *Supply Chain Management: An International Journal*, 20(6), 697–707.
865 <https://doi.org/10.1108/SCM-06-2015-0201>
- 866 Nolan, J., & Bott, G. (2018). Global supply chains and human rights: Spotlight on forced labour and
867 modern slavery practices. *Australian Journal of Human Rights*, 24(1), 44–69.
868 <https://doi.org/10.1080/1323238X.2018.1441610>
- 869 Nowell, L. S., Norris, J. M., White, D. E., & Moules, N. J. (2017). Thematic Analysis: Striving to Meet
870 the Trustworthiness Criteria. *International Journal of Qualitative Methods*, 16(1),
871 160940691773384. <https://doi.org/10.1177/1609406917733847>
- 872 Nwosu, I. A., Eteng, M. J., Ekpechu, J., Nnam, M. U., Ukah, J. A., Eyisi, E., & Orakwe, E. C. (2022).
873 Poverty and Youth Migration Out of Nigeria: Enthronement of Modern Slavery. *SAGE Open*,
874 12(1), 215824402210798. <https://doi.org/10.1177/21582440221079818>
- 875 Palazzo, G., Krings, F., & Hoffrage, U. (2012). Ethical Blindness. *Journal of Business Ethics*, 109(3),
876 323–338. <https://doi.org/10.1007/s10551-011-1130-4>
- 877 Qu, S. Q., & Dumay, J. (2011). The qualitative research interview. *Qualitative Research in Accounting*
878 *& Management*, 8(3), 238–264. <https://doi.org/10.1108/11766091111162070>
- 879 Rajhans, K., & Bhavsar, V. (2023). Impending need of sustainable human resource management
880 practices in construction industry: Evidence from India. *International Journal of Construction*
881 *Management*, 23(13), 2249–2259. <https://doi.org/10.1080/15623599.2022.2050569>
- 882 Rassam, A. Y. (2005). *International Law and Contemporary Forms of Slavery: An Economic and Social*
883 *Rights-Based Approach*. 23, 49.
- 884 Rioux, S., LeBaron, G., & Verovšek, P. J. (2020). Capitalism and unfree labor: A review of Marxist
885 perspectives on modern slavery. *Review of International Political Economy*, 27(3), 709–731.
886 <https://doi.org/10.1080/09692290.2019.1650094>

887 Russell, E., Lee, J., & Clift, R. (2018). Can the SDGs Provide a Basis for Supply Chain Decisions in the
888 Construction Sector? *Sustainability*, 10(3), 629. <https://doi.org/10.3390/su10030629>

889 Sabella, D. (2011). *The Role of the Nurse in Combating Human Trafficking*. *American Journal of*
890 *Nursing*. Vol. 111, No. 2.

891 Santoso, D. S. (2009). The construction site as a multicultural workplace: A perspective of minority
892 migrant workers in Brunei. *Construction Management and Economics*, 27(6), 529–537.
893 <https://doi.org/10.1080/01446190902960482>

894 Saunders, B., Sim, J., Kingstone, T., Baker, S., Waterfield, J., Bartlam, B., Burroughs, H., & Jinks, C.
895 (2018). Saturation in qualitative research: Exploring its conceptualization and
896 operationalization. *Quality & Quantity*, 52(4), 1893–1907. [https://doi.org/10.1007/s11135-017-](https://doi.org/10.1007/s11135-017-0574-8)
897 [0574-8](https://doi.org/10.1007/s11135-017-0574-8)

898 Scaturro, R. (2021). Modern Slavery Made in Italy—Causes and Consequences of Labour Exploitation
899 in the Italian Agricultural Sector. *Journal of Illicit Economies and Development*, 3(2), 181–189.
900 <https://doi.org/10.31389/jied.95>

901 Schoultz, I., Spanger, M., Jokinen, A., Økland Jahnsen, S., Muhire, H., & Pekkarinen, A.-G. (2023).
902 Constructions of migrant victims of labor exploitation in Nordic court cases. *International*
903 *Review of Victimology*, 026975802311749. <https://doi.org/10.1177/02697580231174912>

904 Slavery Convention. (1926). *The Bellagio–Harvard Guidelines on the Legal Parameters of Slavery*.
905 [https://glc.yale.edu/sites/default/files/pdf/the_bellagio-](https://glc.yale.edu/sites/default/files/pdf/the_bellagio-_harvard_guidelines_on_the_legal_parameters_of_slavery.pdf)
906 [_harvard_guidelines_on_the_legal_parameters_of_slavery.pdf](https://glc.yale.edu/sites/default/files/pdf/the_bellagio-_harvard_guidelines_on_the_legal_parameters_of_slavery.pdf)

907 Stevenson, M., & Cole, R. (2018). Modern slavery in supply chains: A secondary data analysis of
908 detection, remediation and disclosure. *Supply Chain Management: An International Journal*,
909 23(2), 81–99. <https://doi.org/10.1108/SCM-11-2017-0382>

910 Stringer, C., Burmester, B., & Michailova, S. (2022). Modern slavery and the governance of labor
911 exploitation in the Thai fishing industry. *Journal of Cleaner Production*, 371, 133645.
912 <https://doi.org/10.1016/j.jclepro.2022.133645>

913 Such, E., Laurent, C., Jaipaul, R., & Salway, S. (2020). Modern slavery and public health: A rapid
914 evidence assessment and an emergent public health approach. *Public Health*, 180, 168–179.
915 <https://doi.org/10.1016/j.puhe.2019.10.018>

916 Sunindijo, R. Y., & Kamardeen, I. (2017). Work Stress Is a Threat to Gender Diversity in the
917 Construction Industry. *Journal of Construction Engineering and Management*, 143(10),
918 04017073. [https://doi.org/10.1061/\(ASCE\)CO.1943-7862.0001387](https://doi.org/10.1061/(ASCE)CO.1943-7862.0001387)

919 Trautrimis, A. (2020). Modern Slavery Responses Need International Business Scholarship. *AIB*
920 *Insights*, 20(2). <https://doi.org/10.46697/001c.13539>

921 Trautrimis, A., Gold, S., Touboulic, A., Emberson, C., & Carter, H. (2021). The UK construction and
922 facilities management sector's response to the Modern Slavery Act: An intra-industry initiative
923 against modern slavery. *BUSINESS STRATEGY & DEVELOPMENT*, 4(3), 279–293.
924 <https://doi.org/10.1002/bsd2.158>

925 United Kingdom Government. (2023). *Modern Slavery: A briefing for the construction industry*. United
926 Kingdom Government.
927 [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/
928 file/638768/FACTSHEET_Modern_Slavery_Construction_v2_WEB.PDF](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/638768/FACTSHEET_Modern_Slavery_Construction_v2_WEB.PDF)

929 United Nations. (2000). *PROTOCOL TO PREVENT, SUPPRESS AND PUNISH TRAFFICKING IN*
930 *PERSONS, ESPECIALLY WOMEN AND CHILDREN, SUPPLEMENTING THE UNITED*
931 *NATIONS CONVENTION AGAINST TRANSNATIONAL ORGANIZED CRIME*.
932 [https://ec.europa.eu/anti-trafficking/united-nations-protocol-prevent-suppress-and-punish-
933 trafficking-persons-especially-women-
934 and_en#:~:text=The%20protocol%20stipulates%20that%20states,children%20that%20leads%
935 20to%20trafficking.](https://ec.europa.eu/anti-trafficking/united-nations-protocol-prevent-suppress-and-punish-)

936 Valdes-Vasquez, R., & Klotz, L. E. (2013). Social Sustainability Considerations during Planning and
937 Design: Framework of Processes for Construction Projects. *Journal of Construction*
938 *Engineering and Management*, 139(1), 80–89. [https://doi.org/10.1061/\(ASCE\)CO.1943-
939 7862.0000566](https://doi.org/10.1061/(ASCE)CO.1943-)

940 Wallis, A. (2017). Effective eradication of modern slavery. *Nature Human Behaviour*, 1(5), 0089.
941 <https://doi.org/10.1038/s41562-017-0089>

942 Walsh, D., Pajón, L., Lawson, K., Hafeez, K., Heath, M., & Court, N. (2022). Increased Risks of Labor
943 Exploitation in the UK following Brexit and the Covid-19 Pandemic: Perspectives of the Agri-
944 food and Construction Sectors. *Journal of Human Trafficking*, 1–16.
945 <https://doi.org/10.1080/23322705.2022.2079063>

946 Wilhelm, M., Kadfak, A., Bhakoo, V., & Skattang, K. (2020). Private governance of human and labor
947 rights in seafood supply chains – The case of the modern slavery crisis in Thailand. *Marine*
948 *Policy*, 115, 103833. <https://doi.org/10.1016/j.marpol.2020.103833>

949 Wray-Bliss, E., & Michelson, G. (2022). Modern Slavery and the Discursive Construction of a
950 Propertied Freedom: Evidence from Australian Business. *Journal of Business Ethics*, 179(3),
951 649–663. <https://doi.org/10.1007/s10551-021-04845-w>

952 Wright, N., Hadziosmanovic, E., Dang, M., Bales, K., Brookes, C., Jordan, M., & Slade, M. (2020).
953 Mental health recovery for survivors of modern slavery: Grounded theory study protocol. *BMJ*
954 *Open*, 10(11), e038583. <https://doi.org/10.1136/bmjopen-2020-038583>

955 Yagci Sokat, K. (2022). Understanding the role of transportation in combating human trafficking in
956 California. *Transportation Research Interdisciplinary Perspectives*, 15, 100673.
957 <https://doi.org/10.1016/j.trip.2022.100673>

958 Yagci Sokat, K., & Altay, N. (2023). Impact of modern slavery allegations on operating performance.
959 *Supply Chain Management: An International Journal*, 28(3), 470–485.
960 <https://doi.org/10.1108/SCM-08-2021-0387>

961 Zuofa, T., & Ochieng, E. (2016). Sustainability in Construction Project Delivery: A Study of
962 Experienced Project Managers in Nigeria. *Project Management Journal*, 47(6), 44–55.
963 <https://doi.org/10.1177/875697281604700604>

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965 **Tables**

966

967 Table 1: General indicators implying modern slavery (Adapted from Alzoubi et al. (2023a))

Signs	Examples
Restricted Liberty	<ul style="list-style-type: none"> • The retention of their personal documents, such as passports or identity cards • The restriction of individuals to a particular workspace without the freedom to leave • Restrictions on communication with external parties and barriers to accessing healthcare services
Behavior	<ul style="list-style-type: none"> • Lacking proficiency in the local languages of the region they are in • Showing a lack of awareness or knowledge about their current location • Tending to remain silent during direct interactions, often deferring to others (typically those in control, such as slaveholders) to speak for them • Looking anxious and depressed • Showing physical signs of undernourishment • Subjected to threats of violence that render them scared and unwilling to speak up • Experiencing intimidation and threats of physical and mental violence
Working Conditions	<ul style="list-style-type: none"> • Have no choice about the time or place of their work • Forced to work in a particular location • Forced to work for extensive hours without breaks • Lacking training or professional qualifications • Low-skilled laborers who possess no formal training or professional credentials for their tasks
Living Conditions	<ul style="list-style-type: none"> • Forced to live in crowded, unsuitable accommodations that lack proper hygiene • Having no control over their living conditions, including the location or individuals they live with
Financial Conditions	<ul style="list-style-type: none"> • Receiving no salaries or extremely minimal salaries for their work • Denied access to their earnings and personal bank accounts • Forced to work to pay off debts to their slaveholders with no salaries given until the full debt is cleared

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Table 2: Sample structure of interviewees

Interviewee	Gender	Country	Size of company	Years of experience	Role
1	Male	UK	Medium	14	Supply chain manager
2	Male	UK	Medium	17	Project manager
3	Female	UK	Medium	23	Sustainable procurement manager
4	Male	UK	Medium	35	Managing director in construction
5	Female	UK	Medium	25	Sustainable procurement manager
6	Male	UK	Large	39	Project manager
7	Male	UK	Small	15	Director of ethics and compliance
8	Male	UK	Medium	23	Health, safety, environment, and quality director

9	Male	UK	Medium	28	Senior construction planner
10	Female	Switzerland	Small	24	Senior communication manager, leadership, and mental health
11	Male	UK	Large	25	Construction manager
12	Male	UK	Medium	12	Construction manager
13	Female	Australia	Medium	12	Head of sustainable and ethical procurement
14	Male	Australia	Small	10	Sustainable procurement manager
15	Male	UK	Medium	17	Director of pre-construction operations
16	Male	UK	Medium	37	ESG and sustainability director
17	Male	UK	Small	12	Project manager
18	Male	Australia	Medium	37	Sustainable procurement and supply chain manager
19	Male	UK	Medium	16	Lead health and safety manager
20	Female	UK	Medium	14	Health, safety, and well-being manager
21	Female	Australia	Small	6	Corporate social sustainability manager
22	Female	Australia	Small	9	Sustainable procurement manager

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Table 3: Comparison between construction companies' statements and managers' explanations

Construction companies' official website statements	Managers' explanations
Company-A has a modern slavery and human trafficking statement and policy. The statement discusses the importance of training employees on modern slavery to raise awareness.	<i>"There is a [modern slavery] policy, but I do not believe that I have ever seen any training" (Manager 9).</i>
Company-B has an antislavery and human trafficking policy. It provides regular training for employees, and newcomers must complete the training within a short period.	<i>"...do I have a modern slavery policy? No, because, as I said, I think some of these things are just written for the sake of it. [...] I would say very little [training] about a year or two ago" (Manager 16).</i>
Company-C has a modern slavery statement and training. It has a human rights risk assessment and a remediation strategy for modern slavery.	<i>"I would say that most businesses we work with, including ourselves, will maybe do a one-off training and that it might not necessarily be repeated after that" (Manager 13).</i>

Table 4: Summary of the main results based on the interview questions

Interview Questions	Main Findings
1. What does modern slavery mean to you?	<ul style="list-style-type: none"> • Managers' Perspectives on Modern Slavery: <ul style="list-style-type: none"> - An unhealthy, unethical, and likely unlawful relationship exploiting the vulnerable. - The exploitation of human beings and a crime against humanity using severe violence. - A complex, illegal practice that obscures the true cost of projects and degrades workers' rights.
2. Does your organization provide training for employees on modern slavery? (If yes, how long is the training? How often is it done? Who has to attend the training? What kind of training is it? What are the key points discussed/addressed during the training? How are the employees assessed to ensure understanding of the training?)	<ul style="list-style-type: none"> • Reasons for the Huge Lack of Training on Modern Slavery: <ul style="list-style-type: none"> - Employees perceive modern slavery as not prevalent or relevant to them. - Employees struggle to see the value of training for certain personnel. • Improving Training Relevance: <ul style="list-style-type: none"> - Need to contextualize and specify training to employee roles for increased interest and relevance. • Current Training Practices: <ul style="list-style-type: none"> - Mostly online modules, lasting 30–45 min. - Focus areas: understanding modern slavery, its causes, identifying warning signs (e.g., a high number of working hours, lack of ID papers or contracts). - Use of real-case studies for practical learning. • Assessment of Training: <ul style="list-style-type: none"> - Involves multiple-choice questions. - Requires a minimum of 80% to pass. - Involves retaking if the score is below 80%, with a reset of the program after repeated failures.
3. Which areas within your organization have a higher risk of modern slavery? Why?	<ul style="list-style-type: none"> • Subcontracting Challenges: <ul style="list-style-type: none"> - Lower tiers with low-skilled laborers have less visibility in policies and procedures. • Complex Supply Chains: <ul style="list-style-type: none"> - Many tiers in the supply chain make managerial visibility difficult.
4. Is there anyone in your organization whose job description deals with modern slavery? (If yes, who are they? Is it their only job? If not, why?)	<ul style="list-style-type: none"> • Managerial Consensus: <ul style="list-style-type: none"> - No single employee is dedicated solely to handling modern slavery issues. • Reason: <ul style="list-style-type: none"> - Every employee should know about modern slavery.
5. In your organization, what do you do when selecting contractors to avoid them using modern slavery?	<ul style="list-style-type: none"> • Prequalification as a Minimum Tool: <ul style="list-style-type: none"> - Used by construction companies to prevent contractors from using modern slavery. • Common Assessment Standard: <ul style="list-style-type: none"> - Contractors answer questions to meet minimum standards. - Focus areas include fair working practices, wages, and the right to work. - There is a requirement to have a policy on modern slavery.

<p>6. What barriers are present to detecting modern slavery on construction sites managed by your organization?</p>	<ul style="list-style-type: none"> • Lack of Awareness: <ul style="list-style-type: none"> - Misconception that modern slavery does not occur. - The assumption that paying real living wages negates the presence of modern slavery. - Uncertainty in identifying instances of modern slavery. - Focus on alternative priorities, such as timely project completion. • Lack of Response and Responsibility: <ul style="list-style-type: none"> - Limited time and resources were allocated to detect modern slavery. - Lack of expertise to effectively check for modern slavery.
<p>7. How are audits carried out to identify signs of modern slavery in your organization?</p>	<ul style="list-style-type: none"> • Audits are not taking place because: <ul style="list-style-type: none"> - Audits can be costly for companies. - Companies believe that they are effectively avoiding modern slavery without audits. • Importance of Site Audits: <ul style="list-style-type: none"> - Audits prevent complacency and need to be conducted regularly. - Emphasis on engaging with workers to check: <ul style="list-style-type: none"> ▪ Proper and regular payment. ▪ Full entitlements and days off.
<p>8. How would you react to a case of modern slavery in your organization?</p>	<ul style="list-style-type: none"> • Reporting Process: <ul style="list-style-type: none"> - Identify: Collect evidence, assess the incident, and understand the organization's link to modern slavery. - Protect the victim: Escalate the case to relevant authorities, such as police, legal bodies, NGOs, or unions. - Rectify the issue: Determine the best remedy for the situation. - Analyze risk: Ensure prevention of future incidents. • No action will take place <ul style="list-style-type: none"> - Lack of a formal reporting protocol for modern slavery cases. - Sensitive topic to deal with. - Alternative priorities, such as subcontractors and workers facing significant work pressure.