

**Human Rights Accounting Disclosures in The UK FTSE 100
Retail: Is There an Impact of Regulations?**

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Abstract

Human Rights issues have recently made their way to the forefront of the discussion surrounding the relationship between businesses and corporate social responsibility. This research seeks to investigate the impact of *Modern Slavery Act 2015* on the human rights accounting disclosures of FTSE 100 UK retail companies. This study uses content analysis of annual reports of UK retail companies from 2013 -2017 using a human rights disclosure index, depending on human rights accounting disclosure literature and materials from *Modern Slavery Act*. The results indicate the increase of human rights accounting disclosures after issuing the act as a result of coercive isomorphic effect of regulations. The paper concludes with recommendations to the policy makers in the UK and emerging countries, as well as future research.

Keywords: Human Rights, Accounting Disclosure, Modern Slavery Regulations, Retail Sector, UK, Emerging Economies, Content Analysis.

الافصاح المحاسبى عن حقوق الانسان فى قطاع التجزئة بالمملكة المتحدة: هل يوجد تاثير للقوانين؟

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المخلص

لقد اصبح حقوق الانسان يلعب دورا اساسيا فى الحوار السائد عن العلاقة بين الاعمال والمسئولية الاجتماعية. يسعى هذا البحث لاكتشاف تاثير قانون العبودية الجديد لعام (٢٠١٥) الصادر بالمملكة المتحدة على ممارسات الافصاح المحاسبى عن حقوق الانسان فى شركات التجزئة. سوف تتبع هذه الدراسة اسلوب تحليل المحتوى للتقارير المالية السنوية لقطاع التجزئة فى المملكة المتحدة من عام ٢٠١٣ حتى ٢٠١٧ باستخدام مؤشر الافصاح عن حقوق الانسان، الذى يعتمد على الدراسات السابقة عن الافصاح المحاسبى عن حقوق الانسان و بعض عناصر قانون العبودية الجديد الصادر عام ٢٠١٥ بالمملكة المتحدة. تدل النتائج على وجود زيادة فى الافصاح المحاسبى عن حقوق الانسان نتيجة التاثير المؤسسى لهذا القانون. تنتهى الدراسة بتقديم بعض التوصيات لمتخذى القرار بالمملكة المتحدة والدول النامية و ايضا بعض الافكار للدراسات المستقبلية.

الكلمات المفتاحية: حقوق الانسان، الافصاح المحاسبى، قوانين العبودية، المملكة المتحدة، الدول النامية، قطاع التجزئة، الدول النامية، تحليل المحتوى.

1. Introduction:

Human rights issues have recently found themselves at the forefront of the discussion on business accountability and corporate social responsibility. It is with this increased awareness of human rights abuses and violations across the global business community that the relationship between corporations and corporate social responsibility has begun to be assessed. Many questions have been raised about the responsibility of businesses to tackle human rights abuses, and with the introduction of the *Modern Slavery Act* in 2015 a discussion on modern slavery abuses has been brought to light. In 2015, the UK Government passed the *Modern Slavery Act*. Coming into play at the end of the 2015/16 financial year, the act required all UK companies – and in some cases, cross-border companies – earning revenues of £36 million or above to produce a transparency statement (sometimes known as an ‘anti-slavery statement’) each year detailing the steps that their organisation has taken to either tackle or prevent the presence of modern slavery and human trafficking violations within the company (*Modern Slavery Act 2015*). By the UK Government’s definition, ‘modern slavery’ is said to include offences relating to both slavery, servitude and forced or compulsory labour and human trafficking. For the purpose of understanding the act, the brief definitions of these are noted as being as follows:

‘Slavery and servitude: the status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised **Forced or compulsory labour:** work or service is exacted from any person under the menace of any penalty and for which the person has not offered him/her self voluntarily

Human trafficking: a person arranges or facilitates the travel of another person with a view to that person being exploited’ (GOV.uk, 2015, p. 17).

The full definitions of these terms from the UK Government can be consulted in Appendix 2. In the guidance document provided by the government for the creation of the slavery and human trafficking statements, it is noted that ‘it is up to organisations how they present information in the statement and how much detail they provide’ (GOV.uk, 2015, p. 10). Therefore, it is evident that although the act requires the creation of a transparency statement, businesses are not required to make a significant effort to tackle modern slavery issues or include an in-depth analysis of their efforts in such a statement. However, with the encouraged transparency of supply chains and threat of negative publicity if they do not comply, it is hoped that companies would be happy to be disclose their efforts to minimise modern

slavery violations within their organisations. With the introduction of the bill, ‘the use of slave labour (including by beyond-first-tier suppliers) becomes a considerable legal risk for focal companies [and] the avoidance of expensive and reputation-damaging litigation might be seen as a crucial task’ (Gold et al., 2015, p. 486). There has been a significant amount of discussion relating to how successful the implementation of the *Modern Slavery Act* may be, as well as what necessary improvements may be required for it to have a lasting impact on human rights reporting of companies within the UK. The primary purpose of this study is to assess how the introduction of the UK Government’s *Modern Slavery Act* in 2015 has impacted the human rights reporting of companies operating within the UK. The research aims to show how retail companies on the FTSE 100 index have changed their disclosures of human rights practices within their organisations, specifically in relation to potential modern slavery violations since the act was introduced. In doing so, it is hoped that this study will show the change over the period before and after the *Modern Slavery Act* was implemented into law.

In terms of objectives for this study, there are three main points that this research hopes to address. Firstly, this study will investigate the changes in human rights reporting, relating to both broader human rights issues and more specifically modern slavery issues, of the FTSE 100 retail companies for two years preceding and two years succeeding the introduction of the *Modern Slavery Act*. Secondly, this study will then assess and discuss whether the *Modern Slavery Act* of 2015 appears to have had any significant impact on changing the human rights reporting practices of these companies. Finally, after achieving the objectives discussed above, this research aims to assess and discuss from a business perspective how successful the *Modern Slavery Act* has been enforced and how much it has encouraged greater tackling of and disclosures regarding human rights issues within UK organisations.

The structure of the paper is as follows; the following section manifests the literature review. Then, the paper highlights the research methods used to conduct the analysis. After that, results and discussion will be presented. Finally, the conclusion is going to be illuminated.

2. Literature Review

In order to cover the literature review about human rights accounting reporting practices, this section is going to discuss the following sub-sections: approaching human rights from a business perspective, tackling human rights issues within businesses, institutional theory, modern slavery act (2015), and placing this paper within the wider literature.

2.1. Approaching human rights from business perspective:

The presence of a discussion on human rights issues from a business perspective, as well as in academia, has been sparse despite being an important aspect of corporate ethics and responsibility (Gray and Gray, 2010). Whilst this is a true reflection of the literature in the grand scheme of things, there are certainly academics and businesses alike who have devoted their time to researching the relationship between business, accounting and human rights. It is an understanding of this relationship that is fundamental to understanding the move towards more human rights conscious reporting from companies.

2.1.1. Defining “Human Rights”

Perhaps one of the greatest challenges when beginning to discuss human rights from a business perspective is having a concrete definition of what ‘human rights’ means to corporate organisations. Sullivan (2003, p. 15) defines human rights as ‘the fundamental principles allowing individuals the freedom to live a dignified life, free from fear or want, and free to express independent beliefs’. By this definition, ‘human rights’ can be seen as ideas that bind individuals together through a common sense of responsibility to the wellbeing of one another. However, without a single and concrete definition, businesses have little guidance on where their responsibilities lie and it is unclear whether such responsibilities lie solely with the state, companies or a combination of both (Gray and Gray, 2010). Ruggie (2008, p. 4) supports such a point, stating that ‘as economic actors, companies have unique responsibilities. If those responsibilities are entangled with State obligations, it makes it difficult if not impossible to tell who is responsible for what in practice.’ This likely proves problematic when businesses are faced with the decision on how best to tackle human rights issues within their organisation and the wider community that they operate within. Bringing Sullivan’s definition into a business perspective, it can be suggested that professional bodies (such as accountancy qualification bodies) are aligned with human rights ideology as they are ‘social offices’ who must uphold certain responsibilities for their members (Paisley and Paisley, 2012). By extension, this principle can be applied to businesses and their corporate social responsibility schemes. Considering all of all these differing interpretations of what ‘human rights’ should mean to businesses, it is difficult to deny that it is a complex term. Nevertheless, it is one without which businesses would not be able to effectively tackle the violation and abuses associated with it.

2.1.2. The Responsibility of Businesses to Tackle Human Rights Issues

Once an organisation has reached a definition of ‘human rights’ that they are happy with, it is still unclear how responsible businesses should be for

taking steps to tackle corporate human rights issues. As raised above, there is an ever-present conflict about whether businesses should have the responsibility to tackle human rights, or whether this should solely be a job for state actors. On one hand, the state has the legislative power to change the approach to human rights reporting from businesses. On the other, if businesses do not actively engage in the promotion of human rights issues without the intervention of the state, how will the state be pushed to change the legislation relating to such issues? It is somewhat of a Catch-22 situation, but perhaps businesses need to acknowledge a responsibility to help impact human rights laws within the state, starting with the recognition of their stakeholders as ‘rights-holders’ instead (Chetty, 2011). This is a sentiment that Gallhofer et al. (2011) support, stating their belief that financial transparency from corporations has the opportunity to pressure both non-state and state actors to act in relation to human rights issues. Conversely, there are a number of academics who argue that the tackling of human rights related issues should not be the responsibility of businesses for a number of reasons. This is perhaps due to the complexity of the relationship between business and human rights. Frynas and Pegg (2003) suggests that the market should not be held accountable for the issues surrounding human rights violations, citing the impractical existence of cultural differences and subsequent restraints placed upon the relationship between the two as the reason for such a conclusion. However, with little involvement from the state in terms of legislation, who else should be responsible for encouraging human rights discourse within businesses? Some would say that accounting standards bodies should have an input, providing concrete guidelines on what companies should disclose. However, the IASB have been reluctant in introducing any human rights legislature, perhaps due to an inability to separate themselves from state and corporate interests (Gallhofer et al., 2011). This creates further confusion within the literature on whether there should be a single professional body, or whether success in encouraging such commitment to the issue is an amalgamated responsibility of all these bodies.

2.2. Tackling Human Rights Issues within Businesses:

In order to place the research undertaken for this paper in a clearer perspective, it is fundamentally important to understand what previous research has suggested about the human rights reporting of businesses, particularly in relation to the retail sector.

2.2.1. Human Rights Issues within Corporate Organisations:

One of the key issues that should be at the forefront of a businesses’ human rights agenda is the health, safety and welfare of their employees, yet

very few companies offer an insight into their health and safety policies. In a case-study of the ICL Plastics explosion in 2004 (an accident that killed nine people and injured thirty-three), Cooper et al. (2011) conclude that the disaster could have been avoided if there had been stricter regulation in place both from the state and the company itself. In order to combat this abuse of workers' rights to a safe working environment, the paper advocates for the mandatory preparation of a health and safety account is crucial in order to protect such rights. The creation of such legislation would implicate the state as responsible for ensuring employees are subject to acceptable and safe working conditions.

Further research within the broad category of employee welfare was done on human capital reporting is demonstrated by McCracken et al. (2018), in which a disclosure index on human capital issues was created and the number of sentences dedicated to such issues in annual reports over the span of two years recorded. The broad disclosure categories that were used were KSA (knowledge, skills and abilities of the employees) and HRD (discussion of how a company enhances their employees' KSA), and the study focused on all of the FTSE 100 companies at the time of research. Overall, the study highlighted a seventeen percent increase in human capital reporting across the two years investigated, although this percentage significantly varied across the change in the more specific sub-categories. From this, the overall conclusion at the end of the study was that companies 'have been increasing their HC reporting, and are doing more than simply fulfilling their statutory duties in this regard' (McCracken et al., 2018, p. 138). This research compliments similar research that has been done in the past regarding human capital reporting. In an attempt to discover the motivations behind such disclosures, Abeysekera (2008) conducted a study on the top thirty listed companies in Sri Lanka. Again, a content analysis on the annual reports of these companies was used, alongside case study interviews to ascertain the motivation behind the choice of the discovered disclosures. The results highlighted that employee relations were the most disclosed human capital category, with workplace safety being the item that had the least disclosed about it. The conclusions of the study were that the motivations behind human capital reporting of different companies changed depending on the industry that they operated within, with only a few disclosure categories being equally reported on across the board. Another aspect within the human rights discussion is the Global Reporting Initiative (GRI) standards. The GRI aims to:

help businesses and governments worldwide understand and communicate their impact on critical sustainability issues such as climate change, human rights, governance and social well-being. This enables real action to create social, environmental and economic benefits for everyone (www.globalreporting.org)

Therefore, it is obvious that the GRI deserves some discussion within the area of business and human rights, despite not being entirely enforceable. Therefore, an important area of study to contribute to the field of discussion on human rights is the investigation of whether the GRI has had any kind of impact on corporate accountability regarding labour practices and human rights. Through the use of the content-analysis of sustainability reports for a sample of transnational companies listed on the Forbes 250 largest companies list, Parsa et al. (2018) concluded that the human rights reporting in line with GRI standards tended to be vague and generalised (rather than offering specific statistic relating to the issues). Nevertheless, this indicates that companies are acknowledging the fundamental importance of addressing human rights issues within their organisations. In order to improve this accountability, the paper suggests a necessary intervention by ‘national governments [who] need to devise the necessary legal and regulatory requirements with effective enforcement mechanisms to protect their workforce’ (Parsa et al., 2018, p. 61).

As well as the GRI, there is also the International Labour Organisation (ILO), the aims of whom are as shown below:

The ILO aims to ensure that it serves the needs of working women and men by bringing together governments, employers and workers to set labour standards, develop policies and devise programmes. (www.ilo.org).

A paper by Islam and McPhail (2011) aims to examine the impact that has been had upon corporate human rights reporting in light of the ILO’s labour standards. The study examined the adoption of such standards for eighteen global clothing retailers for the years 1990 to 2007. The results highlight that the number of companies adopting the ILO’s standards has increased significantly since its implementation in 1998, suggesting that greater attention is being paid to human rights issues within global corporations. To conclude, Islam and McPhail (2011, p. 809) implicate that it is ‘clear is that the discourse of human rights has found its way into the voluntary disclosures made by multinational garment manufacturers in relation to their corporate responsibility and this emergent discourse on corporate accountability for human rights deserves much more attention from the critical accounting community than it has received to date.

2.2.2. The Issue of Disclosure and Accounting for Human Rights

Another key area of discussion within the literature is of how businesses should account and hold responsibility for the actions they take towards fighting the human rights issues of the present day. However, even if there are disclosures within a businesses’ reports regarding human rights issues, it does

not mean that the business is actively in pursuit of an organisation with excellent human rights practices. In a study of the Tanzanian mining sector, Lauwo and Otusanya (2014) note that the transnational parent company (in this case, Barrick Gold Corporation) makes vague commitments to ensuring the improvement of several areas that fall within human rights framework within their company reports. However, upon assessment of the conditions at the workplaces of the subsidiary companies, this does not seem to be the case:

[...] the poor working conditions, the discrimination in the workplace, and the pollution and environmental degradation which prevail, and which deprive Tanzanian citizens of their fundamental human rights, have remained invisible in CSR reports (Lauwo and Otusanya, 2014, p. 103).

This highlights a key issue with the aspect of ‘disclosure’ on human rights abuses. If companies can assert their commitment to tackling human rights, but then plainly ignore the obvious human rights abuses happening within their organisation transnationally, how can the disclosure of such a commitment truly be measured without the enforcement of strict regulations? In a similar paper intended ‘to encourage debates about corporate power and human rights and calls for the accounting and corporate social responsibility literature to connect with human rights’ (Sikka, 2011, p. 812), the risk-management strategies of transnational companies are examined. These are referred to as ‘stabilisation clauses’ and prevent the citizens of the involved countries from going to their local court of law to improve working conditions, which is quite clearly a human rights violation. The case study conducted is of the Chad-Cameroon oil and pipeline project. Again, the concluding discovery of the paper highlights that the transnational companies tended to significantly stress their commitment to human rights, whilst failing to acknowledge the stabilisation clauses and the impact that these had on the subsidiary companies in the project (Sikka, 2011). Sikka (2011, p. 825) concludes that businesses need to ‘[go] beyond the glossy CSR reports and selfcongratulatory statements to examine the impact of corporate practices on the lives of people’ if any true progress is to be made in the field of human rights reporting.

Referring to the previously discussed study conducted by Abeysekera (2008) on the human capital reporting of the listed companies in Sri Lanka, it is noted that workplace safety was the least reported on issue. However, in conducting the case-study interviews, it was revealed that all companies had a strong in-house safety plan and that ‘workplace standards have become a minimum requirement to market their products and services in a competitive market’ (Abeysekera, 2008, p. 25). Again, this highlights the problematic aspects of disclosure, especially when there is so little regulation to help companies decide what should be disclosed in their annual reports.

2.3. Institutional Theory

Institutional theory is focused on “how social choices are shaped, mediated, and channelled by the institutional environment” (Hoffman, 1999, p.351). The basic of institutional theory are ‘institutions’ and ‘organisational fields’. Institutions are rules and regulations as well as ideas, understandings and cultural frameworks (such as neoliberal economics) which have achieved a degree of social permanency in a specific context (Higgins and Larrinaga, 2014; Zucker, 1087). They are experienced as ‘possessing a reality of their own, a reality that confronts the individual as an external and coercive fact’ (Berger and Luckmann, 1966, p.58) and also shape how organisations act and why they do so. Ideas and practices that have reached such a state of influence are said to be ‘institutionalized’ – and bring about homogenization of organisations (a process DiMaggio and Powell (1983) call isomorphism. Isomorphism is guided by three different types of institutional mechanisms: coercive, normative and mimetic (DiMaggio and Powell, 1983) – or, as Scott (1995) describes, three pillars (regulative, normative and cognitive). The regulative pillar (coercive isomorphic mechanism) of institutions is depending on rule setting, monitoring, recompose and punishment (Higgins and Larrinaga, 2014). Therefore, the field acts over individual organisations through the imposition of structures (DiMaggio and Powell, 1983; Scott, 1087). Cases of coercive mechanisms are the enforcement of regulation, the discipline of markets or the exercise of power. Regulations many encompass requirements set down by professional bodies or industry bodies. Coercive mechanisms lead the organisation, and/or its member, to adhere and adjust its structure with the dominant rules to gain legitimacy and survive (Kolk, 2005). Regulatory pressures may also affect some issues of reporting in EU countries, like the spread of environmental management and reporting as a result of the voluntary adoption of the European Eco-management and Audit Scheme (EMAS) sponsored by the EU (Criado et al., 2008). Consequently, this research is going to explore the coercive mechanism impact of the Modern slavery act (2015) on human rights practices of retails companies.

2.4. The Modern Slavery Act (2015)

Equally as important to this paper as the literature surrounding human rights within business is the discussion surrounding the introduction of the *Modern Slavery Act* in 2015, without which it would be impossible to assess how successfully the act has impacted the human rights reporting of UK companies. In regards to the progress of human rights reporting in the twenty first century, Peter Frankental of Amnesty International writes:

While progress over the last decade in human rights reporting has been limited, there are significant developments at a normative level which

have yet to be reflected in institutional processes. For this to happen, there would need to be changes to the national and international regulatory frameworks within which companies operate. We were on the cusp of such changes in the UK with the Company Law Reform Bill, but these did not materialise. (Frankental, 2011).

Perhaps, then, the *Modern Slavery Act* has the potential to significantly bring change to the way the country, and its businesses, approach the issue of human rights. With the desire behind the legislation, there is little reason why the bill would not bring with it change (in theory at least).

2.4.1. Scope of the act and problems in implementation:

As previously mentioned in the introduction, the *Modern Slavery Act* hopes to encourage UK businesses to take a forward-facing approach to tackling human rights violations within their organisations and, to an extent, the global community. However, does the act truly have the ability to insight these changes? In one sense, even if the act does not immediately inspire businesses to take on the challenge of tackling human rights issues, the increased awareness of breaches in human rights from the public may push businesses to act upon such an important issue regardless of whether they are passionate about corporate social responsibility or not (Parsa et al., 2018). However, the *Modern Slavery Act* did not come without its sceptics. Some would argue that the scope of the act is too narrow, with little real potential to have an impact on the marginalisation of vulnerable people both in and outside the UK (Craig, 2017). It is with the research conducted in this paper that the impact that the *Modern Slavery Act* has had so far on UK companies will be investigated.

2.5. Placing this paper within the wider literature:

By reviewing the literature on the issue of human rights from a business perspective, there are a few gaps that can be immediately identified. This paper not only hopes to contribute to the broader literature on human rights, but to create a discussion on a more specific area of the human rights framework – that area is modern slavery. As explained above, the term ‘human rights’ is a complex one with many different areas for discussion and modern slavery is one that has largely gone ignored within the literature. Whilst the research methods within this paper are similar to those used by others to address the human rights reporting of companies (that is, content and textual analysis of annual reports), the subject matter is significantly different. Additionally, with the implementation of the UK Government’s *Modern Slavery Act* merely three years ago, there has been little discussion on the success (or failure) of the act

in achieving its aims. Subsequently, now seems like an apt time to assess the impact the act has had on human rights reporting within UK companies and this is what this research aims to do. Whilst this is a UK specific regulation, and certainly does not operate in the same manner as the GRI or ILO, this study will follow the same line of thought as that presented in the papers previously mentioned that discussed the impact of these organisations on human rights reporting from businesses. The following section illuminates the research methods adopted in this research.

3. Research Method

The main purpose of this study is to assess how the introduction of the UK Government's *Modern Slavery Act* has impacted the human rights reporting on FTSE 100 retail companies in the UK, whilst also taking a specific focus on how much information companies disclose about modern slavery issues. In turn, this study aims to shine a light on how successfully the act has been enforced and how this has, or has not, encouraged businesses to proactively tackle human rights issues within their organisation. In order to achieve the goals outlined above, the research methodology adopted in this study was a content analysis of the annual reports and transparency statements (sometimes referred to as 'anti-slavery statements') of FTSE 100 retail companies operating within the UK. In order to achieve this, a disclosure index of human rights and modern slavery issues was created, and the number of words disclosed by each company recorded over the years 2013 to 2017. By doing so, it is hoped that this study can show the change in human rights reporting over this period.

As set out previously, the companies that have been chosen for this study all have two specific characteristics. Firstly, they are all part of the FTSE 100 index at the date research began for this study and are thus operating within the UK. Secondly, each chosen company is part of the retail sector within the FTSE 100 index. The choice to focus specifically on FTSE 100 companies is undeniably obvious. The guidelines set out *Modern Slavery Act* (2015) are only applicable to companies who supply goods or services within the UK and only impacts organisations with an annual turnover of £36 million or above. As the companies listed on the FTSE 100 index fit both criteria, they make prime candidates for helping to assess the impact the *Modern Slavery Act* has had on the human rights reporting of businesses within the UK. Furthermore, the choice to focus specifically on companies within the retail sector alone might be less clear and should therefore be clearly justified. To put it simply, companies within this sector are at 'high risk' of partaking – whether that be advertently or inadvertently – in human rights violations across their

organisation. This is particularly true in relation to company supply chains and the outsourcing of resources and labour, which makes way for possible exploitations directly related to modern slavery. This is an aspect of business that the *Modern Slavery Act* hopes to tackle, encouraging supply chain transparency from companies that are impacted by the act’s regulations. As Adams (2008) contended, the relationships between retailers and their suppliers have come to the forefront of discussion regarding human rights abuses, with a push in the direction for stricter supplier ‘policing’ to ensure the risk of participating in such abuses is mitigated. Additionally, within the retail sector of the FTSE 100 index, there are a total of nineteen companies that have been examined for the purpose of this study. This has allowed a significant level of study on the impact of the *Modern Slavery Act* within this specific sector, whilst also still being manageable within the timeframe given to complete this research. A full list of the companies that were used for this study can be seen in Table 1 below.

Table 1: A List of the FTSE 100 retail companies used for undertaking this research

The AA	Dixon’s CW	Marks & Spencer	Sainsburys
AO World Plc	Dunelm	Morrisons	Tesco
Caffyns	Halfords	Moss Brothers	Findel
Debenhams	Inchcape	Next	Kingfisher
Dignity	JD Sports	Ocado	

The research undertaken for this study has been primarily rooted in publicly available information, specifically in material that has been published by the companies being studied themselves. There were two main sources of data that were used:

- 1) The annual reports of each company for the years 2013 to 2017 inclusively.
- 2) The transparency statements published by the companies that were made mandatory by the implementation of the *Modern Slavery Act* at the end of the 2015/16 financial year.

As previously stated, these documents and reports were publicly available and accessed through the websites of each company that was chosen to be a part of this research. The choice to use data from the year 2013 to 2017 inclusively was a simply decision. As the *Modern Slavery Act* only came into play at the end of the 2015/16 financial year, the data collected covers a period of two years before and two years after the act was put into place. This helps to

fulfil one of the objectives of this study by allowing comparisons to be drawn about the human rights reporting from these companies before and after the *Modern Slavery Act* was implemented. Whilst undertaking the research required for this research, some companies that were studied can be seen to have published transparency statements even before it was an official requirement. In this case, the disclosures within these statements have also been recorded.

The disclosure index adopted in this research was extracted from Islam et al. (2016) and modern slavery act (2015). The disclosure index consists of seven broader human rights categories and thirty sub-categories. As this research focused on the impact of slavery act, a further three broad categories were added to the disclosure index. These are: slavery, servitude and forced or compulsory labour (with five sub-categories), supply chain transparency (with four sub-categories) and training on modern slavery issues (with two sub-categories). The disclosure index being used for the research within this paper can be viewed in table 2

Table 2: Average Number of Words Disclosed in The Annual Reports of FTSE UK 100 retail companies regarding human rights issues (n=19)

	2013	2014	2015	2016	2017
1.Non- Discrimination					
1.1.Race/Colour/Sex/ Language etc.	43	44	50	49	43
1.2.National/Social Origin	36	35	36	41	35
1.3.Disability/age/health	58	74	74	83	63
1.4.Evidence of Incident	0	0	0	0	0
1.5.Termination/Promotion	9	7	13	17	8
1.6.Equal Pay	0	3	0	3	4
1.7.Employee Training	0	1	1	3	9
Total	146	164	173	196	163
2.Elimination of Child Labour					
2.1.Significant risk	0	0	0	2	2
2.2.Children Under 15	0	0	0	2	2
2.3.Children Under 18	4	0	5	4	5
Total	4	0	5	8	9
3.Physical and Verbal Abuse					
3.1.Work Environment Free From	6	7	6	5	6
3.2.Not Committing Torture	0	0	0	0	0
3.3.Discipline Workers	0	0	0	0	2
Total	6	7	6	5	8
4.Fair Wage and Decent Living					
4.1.Obeying National Wage	5	2	3	13	11
4.2.Paying Full-Time Employee Regularly	0	0	0	0	0
4.3. Welfare Scheme	9	10	16	18	40
Total	14	12	19	31	51

	2013	2014	2015	2016	2017
5.Right to Safe and Healthy Work Conditions					
5.1.Worker Safety Policy	40	42	47	50	46
5.2.Safety Policy Throughout Supply Chain	8	4	4	3	9
5.3.Minimise Risk of Incidents	7	19	8	13	9
5.4.Identifying Hazards	5	3	2	0	8
5.5.Adequate Training	16	23	25	25	20
5.6.Specialised Auditor	12	19	12	9	7
Total	88	110	99	101	99
6.Women and Family Life					
6.1.Maternity Leave	0	0	4	4	0
6.2.Safe Conditions for Pregnant Women	0	0	0	0	0
6.3.Temporary Leave	0	0	2	0	0
Total	0	0	6	4	0
7.Ensuring Positive Impact of Operation					
7.1.Human Rights Impact Assessment	0	4	4	15	5
7.2.Mitigate Risks with Company Sites	0	3	5	15	5
7.3.Operations have no negative impact	0	0	3	2	2
7.4.Supporting Local Operations	23	40	13	32	11
7.5.Encouraged Development and Environment	42	53	46	52	35
Total	65	101	71	115	57
8.Slavery, Servitude, Forced Labour					
8.1. Awareness of Issues Surrounding	10	32	29	24	32
8.2.Not Making Use of	3	3	4	7	16
8.3.Awareness of Human Trafficking	0	2	0	2	13
8.4. Steps Taken to Prevent Use of	13	25	26	24	36
8.5. Evidence of Rectifying	0	0	0	0	4
Total	25	61	60	57	102
9.Supply Chain Transparency					
9.1. Acknowledgement of Sources	0	8	17	13	7
9.2. Assessment of Risks	0	4	6	2	7
9.3.Code of Conduct	0	40	56	69	64
9.4. Evidence of Supply Chain Issue	0	0	0	11	0
Total	0	51	80	95	78
10.Training on Modern Slavery					
10.1.Training to Managers/Employees	0	0	0	0	10
10.2.Training to “high-risk” branches					0
Total	0	0	0	0	10

For each category and sub-category, the number of words disclosed in the annual reports and transparency statements was recorded for the years 2013 to 2017. The choice to use number of words, rather than simply recording whether the company mentioned it and how many times they did so, was made so as to allow a more accurate reflection of change in the companies’ human rights reporting to be shown within the results. From here, statistical analysis

was carried out on the data that had been collected. The results of this analysis can be seen in the following section. Alongside this, a broader discussion of what these results may indicate about the human rights reporting of FTSE 100 retail companies before and after the implementation of the *Modern Slavery Act* is included. Regardless of these limitations and as previously discussed, this study still has an important contribution to make in the literature regarding human rights reporting within businesses. Equally as important, it leaves room for future research to be carried out. The scope for future research is something that will be touched upon in the concluding part of this paper.

4. Analysis and Discussion

This section will compile all the results that were obtained from the data that had been collected. Table 2 can be seen to show a summary of the mean number of words disclosed for each category and sub-category. In order to ensure that this paper meets its aim of discussing the contribution on modern slavery issues, the results for the human rights and modern slavery sections of the disclosure index will be discussed separately.

4.1. Human rights

4.1.1. Non-discrimination

The category of non-discrimination was the largest of all issues surveyed with a total of seven sub-categories. The sub-category with the highest amount of disclosure was on the issue of not discriminating on the basis of disability, age, health status, parental or marital status or sexual orientation. The category requiring evidence of incidents and the actions taken to rectify such incidents received no mention from any of the nineteen companies that were examined. This is closely followed by the issue of ensuring equal pay for equal work and providing employee training on policies and procedures concerning the company's non-discrimination policies, both of which received little attention within all of the company annual reports.

The mean total number of words disclosed was 146 for 2013 and 163 in 2017 (taking a dip from the 196 average words in 2016). This shows an overall increase of 11.6% in the total number of words disclosed between 2013 and 2017.

4.1.2. Elimination of child labour

There were very little disclosures relating to the issue of eliminating child labour from any of the companies that were surveyed. When there was a disclosure, it tended to be vague and unsubstantiated. For example, the AA wrote in their 2016 annual report that they do not tolerate child or forced labour (The AA Annual Report, 2016). Comments like this provide very little insight into the steps taken by such companies to prevent or eliminate child labour within their organisation.

In 2013, the total average number of words was 4. In 2017, this has merely raised to 7. Whilst this shows a 75% increase statistically, the reality of the numbers indicates little acknowledgement from businesses on the issue of child labour before or after the introduction of the *Modern Slavery Act*.

4.1.3. Physical and verbal abuse

Another category that received little to no mention in the company annual reports was on the issue of physical and verbal abuse. This category included sub-categories dealing with a company providing a work environment free from harassment or abuse and their approach to the discipline of employees. In 2017, there was only an average of 8 words disclosed regarding this topic, having only increased from 2 in 2013. Again, this shows a large percentage increase (300%) in total number of words disclosed but is still clearly a subject that companies are unwilling to disclose about, or at least feel like has little relevance, in their published reports.

4.1.4. Fair wage and decent living

Perhaps one of the most discussed subjects relating to human rights is the right to a fair wage for the work that employees do. Regardless of this, the companies that have been researched for this study had very little to say on this category of human rights disclosures either.

In 2013, the average number of words disclosed was 14 and by 2017, this had increased to a mere 50. This shows a 257.1% increase in average number of words disclosed. Whilst this certainly shows that companies are paying slightly more attention to such a topic, the total number of average words disclosed in 2017 is still not a significant number when compared to some of the other categories. The increase in discussion of this subject by 2017 may seem to be in line with the introduction of the National Living Wage in April 2016 which sparked discussions on both the cost of living and the impact the Living Wage would have on company finances. Marks & Spencer's is one of the few companies to disclose by 2017 that they had increased their employee's pay to well above the National Living Wage and committed themselves to a path of seeking fairer pay for their store colleagues (Marks & Spencer, 2018).

4.1.5. Right to safe and healthy work conditions

The second largest category that was tackled in this research is employee's right to safe and healthy working conditions. There was a total of six sub-categories which investigated company disclosure on organisation safety policies and the steps taken to identify hazards and minimise the risk of accidents, as well as the training of employees to allow them a degree of

responsibility in managing their own workplace safety. Out of all the sub-categories, the one with the largest average number of words disclosed was regarding the company's worker safety policy which stayed relatively consistent throughout the five-year period being examined. In fact, the total average number of words disclosed across the whole category (from 88 in 2013 to 99 in 2014) remained steady and saw only a 12.5% increase. This indicates that the *Modern Slavery Act* has had little impact on company policy and disclosure regarding workplace safety.

4.1.6. Women and family life

Women and family life was another one of the categories to receive practically no mention in the annual reports. Out of the nineteen companies examined, only one company (Dixon's Carphone Warehouse) was found to disclose any information relating to women's pregnancy or maternity leave. In the case recorded, Dixon's mentioned in both their 2015 and 2016 annual reports that they seek to not discriminate against pregnant women and/or women on maternity leave (Dixon's Carphone Warehouse, 2015; Dixon's Carphone Warehouse, 2016). When comparing the total average number of words disclosed in 2013 with that of 2017, there is not visible change as both record a total of zero being disclosed.

4.1.7. Positive impact of the organisation

The final category within this human rights framework is ensuring that the company has a positive impact on the community that it operates within. The first three subcategories have very little disclosed about them within any of the annual reports, and the two that receive most attention are regarding supporting local businesses and ensuring they are positively contributing to environmental causes within the local community. This category perhaps relates least to the more commonly discussed human rights issues but is still an important indicator of sustainability reporting and the support of the human rights of those who live around an organisations company site. Surprisingly, this category is the only one to see a decrease in average number of words disclosed between 2013 to 2017. In 2013, the average number of words disclosed was 65. By 2017, this has dropped to 54 showing a decrease of 16.9%.

4.2. Modern slavery

As this study is in response to the introduction of the *Modern Slavery Act*, the reporting on the modern slavery issues outlined below will be able to provide the clearest picture of how the act has impacted human rights reporting in relation to modern slavery of the UK companies examined.

4.2.1. Slavery, servitude and/or forced labour

The first category to show disclosure on modern slavery reporting was slavery, servitude and force/or compulsory labour. This had five sub-categories that spanned from awareness of the issues to evidence of correcting any violations that had occurred within the company. This category saw a significant increase of number of words dedicated; it quadrupled from 2013 to 2017 (25 words to 100 words). Certainly, this shows that modern slavery has become an issue that has increased in awareness over the past five years and perhaps the *Modern Slavery Act* can be seen to have had such an impact on contributing to this. All of the companies that were investigated had something to say under the bracket of slavery, servitude and forced and/or compulsory labour by the end of the 2016/17 financial year within their annual reports.

4.2.2. Supply chain transparency

Supply chain transparency is one of the key issues that the *Modern Slavery Act* hopes to address, and is the primary reason that businesses are now required to produce the transparency statements at the end of each financial year (*Modern Slavery Act 2015*). To combat any chance of modern slavery occurring within their supply chain, many of the retailers examined have created a ‘code of conduct’ that is said to be used to screen suppliers before any business is undertaken with them. A good example of this is that of Dunelm Plc, who ensure all suppliers sign a code of conduct that dictates there should be a safe environment for employees, that workers should be treated with respect and earn a reasonable wage, amongst other things. The company goes one step further to mention that in the case any modern slavery abuses, particularly in relation to forced or child labour, all supplier relations are halted until the issue is remedied (Dunelm, 2018). This ‘code of conduct’ is the sub-category of this issue that sees the greatest number of words disclosed about it over the five-year period. Whilst not all companies refer to it under such a phrase, the ideology of strong and clean supplier relationships has come to the forefront of businesses’ agenda in the recent years. Again, the statistical results highlight a jump from zero average words mentioned in 2013 to 78 in 2017.

4.2.3. Training on modern slavery issues

In regard to training on modern slavery issues within the businesses examined, there was no mention of either sub-category issue from 2013 to 2016. In 2017, one of the nineteen companies investigated mentions anything to do with training their employees in aspects of modern slavery, showing little commitment from businesses to spread awareness of the human rights violations that are occurring (and that they are trying to prevent) within their organisations.

Statistical significance

In order to test the statistical significance of the number of words disclosed by the companies that were investigated against whether or not the *Modern Slavery Act* was in place at the time, a linear regression was run. For this, the dependent variable was the number of words disclosed, and the independent variable was a dummy variable stating whether the act had been introduced (or not) in the given year. The results of the regression were as follows:

Regression Statistics	
Multiple R	0.329707204
R Square	0.108706841
Adjusted R Square	0.099123043
Standard Error	231.2592593
Observations	95

	<i>df</i>	<i>SS</i>	<i>MS</i>	<i>F</i>	<i>Significance (p-value)</i>
Regression	1	606621.1	606621.1	11.34277	0.001103223
Residual	93	4973719	53480.85		
Total	94	5580340			

The p-value given from the data collected was 0.001. It was assumed that the significance level was 5% in undertaking this regression. As the significance level is greater than the p-value ($0.001 < 0.05$), we can reject the null hypothesis and conclude that the independent variable (*Modern Slavery Act* implementation) is statistically significant in influencing the dependent variable (the number of words disclosed on human right issues by the companies).

Additionally, the R squared value is very low, and shows that the presence of the *Modern Slavery Act* only contributes to 10% of the variation in number of words disclosed. This, however, is unsurprising considering how many other factors play a part in the disclosure practices of businesses.

4.3. Overall Comments

As we can see from the table in Appendix 2, the overall results highlight that the human rights reporting of UK retail companies between 2013 to 2017 has increased. The total mean number of words disclosed in 2017 was 560, as opposed to the only 344 that were disclosed on average in 2013. This shows an average of a 62.8% increase in the quantity of human rights disclosures from the business' investigated over the period.

Subsequently, it can be concluded that with the introduction of the *Modern Slavery Act* in 2015, human rights disclosures have seen in most cases a steady increase within the annual reports on a year-by-year basis. Whilst it would be naïve to suggest that the introduction of the act was solely responsible for this change, it has undoubtedly had an impact. To support this assertion, the regression analysis concluded that the *Modern Slavery Act* has been statistically significant in influencing the number of words disclosed by UK retail companies. This remains true even in lieu of all the other outside factors that will have impacted the businesses' human rights reporting practices. However, although the act seems to have increased human rights reporting overall, there is still little disclosed about the modern slavery issues chosen for examination. Few or no companies mention human trafficking, employee training or even discuss any examples of human rights violations they have come across in their businesses. Converse to the statistics, this may imply that the *Modern Slavery Act* still has a long way to go before it has any significant impact in changing human rights reporting.

As previously discussed, the introduction of the *Modern Slavery Act* came with the requirement for all companies operating within the UK and earning turnovers of £36 million and above per annum to produce a transparency statement (or anti-slavery statement) detailing the steps the organisation has taken to combat modern slavery issues. When consulting the transparency statements, it can be seen that they counter the underwhelming statistics that were gathered in relation to modern slavery disclosures within the annual reports. Due to the limited word-count of this study, it is impossible to display and discuss all the statistical data gathered from the transparency reports. What is obvious, however, is that they place emphasis on modern slavery issues (unsurprisingly) and very rarely mention any other human rights disclosure categories within the statement. The content (and quantity of it) varies drastically from company to company, and this could perhaps stem from industry. Companies like Debenhams, Marks & Spencer's and Tesco have provided lengthy, anti-slavery statements highlighting their commitment to tackling modern slavery through their own organisations and beyond. Contrastingly, other companies disclose the bare minimum. This is true of, for example, AO World, whose transparency statements consist solely of a single page on their website and have been the same for the two consecutive years they have been required. This reinforces the ideas presented within the literature review on the issue of disclosure; without the proper rules in place regarding what should be disclosed, businesses are free to interpret the 'guidelines' how they see fit. This continues to prove a problematic aspect of the discourse on human rights that has yet to see any concrete solution.

5. Conclusion and Future Research:

To conclude, what we can see from the results of this study is that human rights reporting has increased (albeit slowly) for UK retail companies over the past five years as a result of coercive isomorphic pressure of the introduction of the *Modern Slavery Act*. And, the statistical analysis carried out on the collected data supports this theory. What does this mean, though, in the context of the wider literature on human rights from a business perspective?

The literature on the subject of human rights and business is varied, unsurprisingly so when you consider the vast variation in industry, size and capital of the market. With this variation comes a differing attitude towards human rights and company disclosures from each individual company, acting in their own unique interests. In the literature review, it was ascertained that human rights disclosures have recently seen an increase across a number of sectors and countries. The results in this study support this assessment, and it can be argued that (for the UK at least) the *Modern Slavery Act* has been somewhat successful in its aims. Only somewhat, though, as the change that can be seen has not been dramatic or sudden. In this vein, it would perhaps be apt to suggest that the act has not yet reached its full potential. After only being implemented at the end of the 2015/16 financial year, it may take longer – and maybe also some revisions – for the act to truly have an impact on human rights reporting of UK companies. These revisions would most likely have to come in the form of the creation of stricter guidelines on what companies should aim to include in their transparency statements. Whilst there is information available regarding such a subject, businesses are generally left to decide what to include on their own. Additionally, the act itself is ‘soft’ on pushing businesses to make a commitment to tackling human rights. As long as a transparency statement is produced, there is no obligation for businesses to take an active stance on protecting the human rights of their employees both internally and externally. The hope of the UK Government is primarily rooted in the fact that increased awareness of human rights issues will perhaps place public pressure upon companies to positively impact the human rights discourse of today. If this is a successful strategy then the success of the *Modern Slavery Act* would very much be rooted in legitimacy theory; a theory that suggests pressure from outside sources (public, social and economic) are responsible for driving change within company disclosures.

Referring back to the results obtained from assessing the impact of the *Modern Slavery Act* on the human rights reporting of UK FTSE 100 retail companies, we can perhaps also see the increase in the average number of words disclosed over the five-year period as being rooted in legitimacy theory. The content in many of the transparency reports seems to support such an

assessment also. However, there are many of the human rights disclosure categories that had little to no mention in either the annual reports or transparency statements. These are the issues that business should work towards discussing in order to create a truly significant contribution to the human rights discourse.

Whilst these results are a starting contribution to the discussion of modern slavery issues and the *Modern Slavery Act's* implementation, it is certainly only that – a starting point from which further research must be carried out to truly ascertain the impact of the act on human rights reporting across the UK. The same can be said of the progress being made towards clearer and better human rights disclosures within a company's reports; there is still an indefinite amount of time before.

The choice to focus only on annual reports and transparency statements may not have given an entirely true reflection of each company's human rights reporting practices. Although it is assumed that the majority of the disclosures that will be made are contained within these documents, an acknowledgement of sustainability reports, websites and media coverage may have given a better overall picture of how the company's reporting practices have changed over the past five years. Again, it is also important to highlight the complexity surrounding the idea of disclosure; it is something that will vary drastically from company to company and perhaps does not truly reflect the commitment (or lack thereof) of a company to the combatting of human rights violations. Again, this is something that may mean that any results garnered for this study (and perhaps future studies) can never be truly reflective of a company's human rights policies. Finally, the study could have done with expanding beyond the study of nineteen companies. This would have allowed a better reflection of how the *Modern Slavery Act* has impacted retail companies in the UK. Nevertheless, this study has contributed to the beginning of filling a gap within the literature of the *Modern Slavery Act* and company modern slavery disclosures.

The areas that are key for future studies mostly seek to combat the limitations with this research that have been discussed above. As there were significant time constraints on the research conducted for this study, there are several opportunities to enhance the ideas presented in this research. Firstly, and perhaps most obviously, the study would benefit from an examination of a greater number of retail companies. This would allow a better assessment of whether the *Modern Slavery Act* has truly had an impact on the human rights reporting of retail companies within the UK. Additionally, the original intention for this study was to investigate two industries: retail and food and beverage. Again, due to time constraints, it was not possible to do this.

Nevertheless, this study paves the way for the investigation of the impact that the *Modern Slavery Act* has had on differing industries, thus leading to a better understanding of the success (or failure) of the bill so far in a broader context. Moreover, there is still room for expansion upon the investigation of the other categories discussed within the human rights framework. This is particularly poignant when considered in light of the human rights issues that have been at the forefront of our media at the moment, as previously mentioned, and would certainly make a good contribution to the literature.

Additionally, it is interesting for developing countries like Egypt to issue human rights and slavery laws to improve the quality of accounting disclosure and attract more investment.

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