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Learning to See Modern Slavery in Supply Chains through Paradoxical Sensemaking

ABSTRACT

Mandatory annual reporting, to improve transparency of working conditions in firms' supply chains, is the favoured approach of UK policymakers for reducing modern slavery risks in supply chains. Despite legislation and extensive guidance, annual corporate statements are disappointing, providing little evidence of substantive action. So far though, there has been little primary research of managers' understanding of the phenomenon, or their perceived agency in tackling modern slavery. In a qualitative study, employing template analysis, data were drawn from multiple sources, including interviews with 32 managers from three large UK firms in a complex, high-risk sector (construction). Four focus groups were used to establish credibility of the findings. As managers struggle with how to make sense of where to look, how to look, and what to see, they adopt narrowed perspectives and analogies that inhibit immediate, compelling action. Improved awareness of UK labour supply chain issues has distanced managers further from action relating to global materials supply chains. Through analogy with health and safety legislation, which developed over a considerable period, managers justify a wait-and-see approach, deferring action. Such convenience framing helps them to avoid issues relating to complexity, control, cost and (in)visibility. This framing needs to be disrupted for meaningful action to result. Drawing on sensemaking theory relating to paradoxical financial

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and sustainability objectives, the study suggests how extended legislation and governance may drive more substantive responses that transcend the constraints of business-case logic.

Keywords: Ethics; Legal and Regulatory Issues; Organizational Learning and Knowledge Acquisition; Sustainability; Case Study

INTRODUCTION

Modern slavery in supply chains constitutes “one of the defining grand challenges of our time” (Crane et al., 2022, p. 264). However, studies of corporate responses to transparency legislation, have consistently found poor reporting performance with little evidence of substantive action (Birkey et al., 2018; Flynn, 2020; Rogerson et al., 2020). Various legislation seeks to stimulate corporate action by requiring public reporting, which in turn, enables stakeholder scrutiny. Some legislators favour specific modern slavery reporting legislation (e.g. the California Transparency in Supply Chains Act 2010, section 54 (Transparency in Supply Chains) of the UK Modern Slavery Act 2015, and the Australian Modern Slavery Act 2018). Others, take a broader approach to non-financial reporting (NFR) covering human rights and environmental issues, such as the European Union’s Corporate Sustainability Reporting Directive 2022/2464. Due diligence approaches go further by mandating action (e.g. Germany’s Supply Chain Due Diligence Act that came into force in 2023, and the European Commission (2022) proposed Corporate Sustainability Due Diligence Directive). However, poor reporting performance is apparent despite multiple sources of information being available to practitioners, including official resources and guidelines, internal corporate policies, and the availability of non-governmental organisations’ (NGOs) best practice advice (e.g. Ethical Trading Initiative, 2019).

Corporate reports, sanitized by lawyers, are unlikely ever to reveal the underlying attitudes, knowledge and behaviour of managers that may explain the lack of substantive action.

Limitations may have many possible causes, such as the complex context, the hidden nature of modern slavery (Gold et al., 2015; Yagci Sokat & Altay, 2023), managers' understanding of the phenomenon, or their interpretation of multiple informational and instructional communications. Supply chain practices depend on managers' sense of what to look for, where to look, and their motivation to manage supply chains beyond tier one. Modern slavery is a complex phenomenon (Bodendorf et al., 2023; Crane, 2013), with distinctive characteristics (New, 2015) and continually emerging mechanisms for exploitation (Crane et al., 2022). Supply chains are often complex, long, and fragmented. In a modern slavery context, it is also important that labour supply chains are managed as comprehensively as product supply chains (Caruana et al., 2021). To identify the triggers for more substantive corporate responses, it is necessary to understand how managers navigate phenomenological and structural complexities, and rationalize their actions.

The study's objectives are to extend theory relating to how managers understand transparency reporting requirements in complex situations, and to develop theoretically grounded insights to inform evolving policy and practice. Our guiding research questions are: how do managers make sense of multiple sources of modern slavery requirements in a complex commercial context, and how might firms' commitment to more substantive action be increased?

The study draws on interviews with thirty-two managers from three large construction firms. Construction is consistently recognised as a sector of concern with respect to modern slavery (ILO, 2018; Independent Anti-Slavery Commissioner, 2022; New, 2020). Structural, operational, and economic factors combine to increase risks in the sector. Outsourcing trends have increased supply chain complexity, and modern slavery risks have been exacerbated by the use of unregulated labour agencies (Chartered Institute of Building, 2018) and increased employment of migrant workers to tackle labour shortages (Trautrimis et al., 2021). Investment in mitigating actions is compromised by notoriously narrow margins in the sector (CBI, 2020).

The research adopts a sensemaking perspective because of its relevance to contexts in which action depends on how people construct meaning and rationalise action. Sensemaking is a retrospective process through which “socially acceptable and credible” accounts are constructed (Weick, 1995, p. 61), and through which managers justify actions to themselves and others (Weick, 1993). Despite the prevalence and gravity of modern slavery, there has been little research focused on managers sensemaking of this phenomenon, and its implications for meaningful supply chain action.

Theoretical contributions are made through the identification of *convenience framing*. By adopting this frame, managers interpret complex contexts in a manner that distances them from immediate, compelling actions, in the absence of suitably convincing drivers to resolve the paradox between financial and sustainability objectives. Convenience framing helps to account for the lack of substantive action noted in modern slavery statements (Birkey et al., 2018; Meehan & Pinnington, 2021). Sensemaking of paradoxical sustainability and financial objectives (Hahn et al., 2014; Xiao et al., 2019) is considered, to suggest how the business-case logic underpinning convenience framing may be supplanted.

CONCEPTUAL REVIEW

Modern Slavery Context

Despite the endurance of slavery as a deeply entrenched social problem, it has only recently been acknowledged as a contemporary supply chain issue (Craig et al., 2019). Modern slavery encompasses a range of human rights abuses including child labour, forced labour, debt bondage, and human trafficking. These practices violate individuals’ social and economic freedoms and coerce them into labour (Nolan & Bott, 2018). There is a considerable grey area in defining what constitutes modern slavery, but it is generally accepted to sit at the extreme end of a continuum of labour exploitation practices (Caspersz et al., 2022; Crane et al., 2022). Modern slavery is characterised by control, rather than ownership as experienced under historic

chattel slavery (Crane, 2013). Control is exerted by various means, including coercion, deceit, financial exploitation and deprivation, and restricted freedom. As a hidden crime, detection can be challenging (Gold et al., 2015). Moreover, when instances of modern slavery are identified or suspected, enforcement challenges can arise where supply chains span multiple jurisdictions (Nolan & Bott, 2018).

Legislative frameworks in the UK, Australia, and California use Transparency in Supply Chains (TISC) approaches that aim to improve visibility and accountability for human rights issues in corporate supply chains. TISC provisions require firms to disclose the steps they have taken to identify, prevent, and mitigate the risk of modern slavery throughout their supply chains. Policymakers can favour the minimised regulatory costs of TISC approaches, which assume that public disclosure and potential scrutiny will motivate firms to adopt responsible supply chain practices (New, 2020). However, TISC legislation around the world typically only applies to large corporations. In the UK, only commercial firms with a turnover of \geq £36m fall under the Section 54 reporting requirements of the Modern Slavery Act (2015). Further, although firms are legally required to publish a statement, there are no set rules that mandate their quality or content (LeBaron, 2021).

The extant literature establishes a pattern of inadequate corporate responses that rarely extend beyond minimal compliance with the limited legal obligations (Flynn & Walker, 2021; Pinnington et al., 2023; Voss et al., 2019). There is evidence that institutional pressures are leading to isomorphic reporting (Christ et al., 2019; Flynn & Walker, 2021). Modern slavery statements have been criticised for being largely symbolic as they frequently provide little or no evidence of substantive action (Huq & Stevenson, 2020). Inadequate reporting may reflect reluctance to disclose information, but also may be indicative of poor discovery practices including supply chain mapping, risk assessments, and worker audits (Pinnington et al., 2023). For some firms, these practices are challenging to manage even at tier one in their supply chains

(Swift et al., 2019). The lack of substantive action has also been attributed to firms' use of ambiguous reporting that can maintain the status quo, reduce accountability, and delay meaningful supply chain action (Meehan & Pinnington, 2021). More stringent legislation could lead to more substantive action (LeBaron & Rühmkorf, 2017). However, there is a risk that the additional costs may be passed upstream, exacerbating the economic conditions under which modern slavery thrives (Schleper et al., 2022).

Empirical studies, primarily focused on analyses of published modern slavery statements, indicate a mismatch between legislators' transparency goals and extant practices. However, what has not yet been empirically investigated is how managers understand and interpret the potential for modern slavery in their supply chains, and how they formulate and justify their responses. In this sensemaking activity, supply chain managers must navigate and interpret emerging legislation, official guidance, best practice advice, internal policies, and supplier responses.

Sensemaking

Sensemaking provides a useful lens to examine how modern slavery issues are understood and tackled. Sensemaking encompasses processes through which managers come to understand their environment and is defined as "the ongoing retrospective development of plausible images that rationalize what people are doing" (Weick et al., 2005, p. 409). Sensemaking consists of interrelated stages: scanning, interpreting, and learning (Daft & Weick, 1984). Although different terminology is sometimes used for the third stage, such as learning, enactment (Weick et al., 2005), and responding (Hahn et al., 2014), all emphasise the close association between interpretation and action. Sensemaking is a retrospective process (Weick, 1995) when used to evaluate and justify actions already taken. However, it can also be future-oriented where reflection on enacted meaning drives learning and revised action (Brown et al., 2015; Rouleau & Balogun, 2011).

Sensemaking is particularly relevant in ambiguous or complex situations (Maitlis & Lawrence, 2007). In such contexts, people deconstruct situated complexity and reframe meaning using more readily understood concepts. This process of simplified framing becomes essential when managers reach the limits of their cognitive capabilities (bounded rationality) (Hahn et al., 2014; Wade & Griffiths, 2022). During the process of reframing, managers may use metaphors or analogies that draw parallels with similar or previous comparable situations. This practice aids their own understanding and provides legitimacy to the constructed meanings (Cornelissen et al., 2011). This reframed meaning is contextually constrained (Gioia & Chittipeddi, 1991). In the face of equivocality, managers develop and evaluate different possible interpretations, selecting the most plausible (Weick, 1995). The notion of “most plausible” implies that this interpretation is more meaningful than other interpretations. The act of privileging particular positions and cues can introduce biases into sensemaking, potentially maintaining, changing, or constraining meanings, and may favour plausibility above accuracy (Thurlow & Mills, 2009).

When people construct meaning and evaluate potential responses, they also assess the legitimacy of the messages they receive. Legitimacy is underpinned by systemic power, encompassing taken-for-granted assumptions, organisational structures, and established processes (Schildt et al., 2020). Alongside the discursive influence of sensegivers, legitimacy plays an important role in determining whether received messages are perceived as common sense, a new sense, or non-sense (Vaara & Whittle, 2022). Messages that align with established norms and are widely accepted as correct, are considered to be “common sense”. For a “new sense” to be established it must be regarded as a legitimate departure from prior perspectives, or it risks being dismissed as “non-sense” (Vaara & Whittle, 2022). In the context of modern slavery, managers need to evaluate multiple sources of internal and external information, including legislation, official guidance, industry best practice, contractual requirements, and

internal policies. To achieve a collective understanding can be difficult and so interpretations by senior leaders are instrumental in the establishment of a dominant sense (Maitlis & Lawrence, 2007).

Paradoxical business objectives

Sensemaking in social sustainability contexts, such as modern slavery, is further complicated by difficulties in reconciling financial and sustainability objectives (Crane et al., 2014). There is a need to understand how people deal with prolonged paradoxical puzzles that defy sensemaking (Weick, 1995). Such paradoxes are defined as “contradictory yet interrelated elements that exist simultaneously and persist over time” (Smith & Lewis, 2011, p. 382). Paradoxes are latent in organisational systems, but the saliency of tensions is intensified by peoples’ sensemaking (Smith & Lewis, 2011). Attempts to make sense of paradoxical objectives can inadvertently exacerbate the contradictory forces to a point of organisational paralysis (Luscher et al., 2006). “Organizational lives are awash with tensions” (Miron-Spektor et al., 2018, p. 26). The problem is not the existence of potentially contradictory factors, but the mindset adopted by people in response to tensions, which may intensify under conditions of resource shortage (Miron-Spektor et al., 2018).

Practitioners, confronted with conflicts between sustainability and financial objectives, typically assume that financial considerations take precedence. This leads to sustainability efforts being side-lined or justified solely in terms of financial viability (Xiao et al., 2019). This business-case logic implies that sustainability objectives would only be pursued where a commercial advantage is apparent, such as may be envisaged in ethical markets. Otherwise the costs may be considered unjustified. Alternatively, under a paradoxical cognitive framing, sustainability and financial objectives can be managed simultaneously (Crane et al., 2014). This requires a more comprehensive evaluation of the ambivalence of sustainability risks, which in turn can lead to a more cautious approach to action (Hahn et al., 2014). Managers

adopting a paradox mindset tend to embrace complexity, inconsistency, and dynamism, seeking higher-order, innovative options instead of settling for compromises (Miron-Spektor et al., 2018; Smith, 2014).

While sustainable supply chain management is marked by various tensions, the application of paradoxical sensemaking has only recently attracted scholarly interest and further research is needed (Fayezi, 2022; Xiao et al., 2019) (Xiao et al., 2019). Modern slavery provides a rich, complex context in which to explore questions of *who* makes sense of *what*, and *how*, in the face of paradoxical objectives.

METHODOLOGY

This study examines how managers make sense of multiple sources of requirements aimed at addressing modern slavery within their supply chains. It also explores their perceptions of how firms' commitment to more substantive action may be increased. Case research enables a deeper exploration of practices and complexities and is common in supply chain research (Voss et al., 2002). The paucity of empirical data on modern slavery in supply chain contexts makes a case study particularly relevant, as awareness and management of modern slavery in practice is under researched. Three case firms (MSA reporting entities) involving multiple participants and data sources were utilised. This reduces risks of findings being specific to a single organisation, or important insights being missed if they are not exhibited in a single firm (Yin, 2018).

Template analysis was selected as our analytical method as it allows for structured analysis within a case study context, without inhibiting interpretation and novel insight (King & Brooks, 2017). Template analysis has been used in supply chain research (Bastl et al., 2012; Karatzas et al., 2016; Lusiantoro & Pradipto, 2022; Lusiantoro & Yates, 2021). Its suitability extends

to any research philosophy, provided that complementary processes are followed (King & Brooks, 2017).

Our relativist ontology recognises plurality in human understanding and behaviour, and our constructivist epistemology encourages researchers to acknowledge and explore emerging points of interest that would be constrained by positivism. These positions characterise contextualism, a philosophy in which the researcher “[s]eeks to understand participants’ meaning making within the specific research context” (Spencer et al., 2021, p. 538). Reflexivity played a crucial role and at all stages we took into account alternative interpretations and explanations (King & Brooks, 2017). Multi-researcher discussions and reviews provided opportunities to challenge researcher influence and preconceptions thereby ensuring the enhancement of novel insights. Iterative and inductive analysis ensured that theoretical insights were heavily grounded in data. Given its emphasis on context and the plurality of meaning, contextualism is particularly well suited to studies of behavioural responses.

Empirical Context

Despite being one of the UK’s most important sectors and employing an estimated 2.2 million people in 2020, modern slavery is widespread in construction supply chains (ILO, 2018; New, 2020). Estimates suggest that only domestic work ranks higher in its prevalence of modern slavery in the UK (Chartered Institute of Building, 2018).

Structural, operational, and economic factors create conditions where slavery can flourish and remain undetected. Construction has high levels of outsourcing that can increase supply chain and contractual complexity (Preuss & Fearne, 2022). Labour shortages have resulted in high numbers of migrant workers who are often employed several supply chain tiers away from the primary contractor (Trautrimis et al., 2021). Furthermore, the use of labour agencies, often not subject to thorough due diligence, exacerbates the risks associated with modern slavery (Chartered Institute of Building, 2018). These risks are compounded by weak profit margins

of only 2.6%, compared with a cross-industry average of 17.9% that may prevent the commitment of financial resources to investigate labour risks in firms' supply chains (CBI, 2020). Despite the inherent risks, construction firms' modern slavery statements are often superficial or watered-down, and the sector has faced criticism for its inadequate response to the UK's Modern Slavery Act potentially signalling limited management of the issues (Gutierrez Huerter O et al., 2021; Independent Anti-Slavery Commissioner, 2022).

Sampling and Data Collection

Access to companies willing to participate in the research, was facilitated by the Crown Commercial Service (CCS), the UK Government's central procurement agency. Participating companies were suppliers to CCS operating in the construction sector and were chosen to represent different levels of modern slavery reporting quality.

A snowball sampling technique was employed, in each company, to ensure that the most informed and relevant contacts were identified (Martin & Eisenhardt, 2010). In discussion with senior stakeholders, relevant informants with direct responsibilities for supply chain and/or modern slavery risks were identified from roles such as supply chain, procurement, human resources, and ethical compliance functions. The cross-functional sample (see table 1 for details) ensured that cross-organisational differences in policy interpretation would be more likely to surface compared with an intra-function sample. Informant and organisational anonymity were assured through the university's formal ethical research processes.

← Insert Table 1 approximately here →

Primary data were collected from semi-structured interviews with thirty-two managers (see Table 1), guided by an interview protocol (see Appendix). The average duration per interview was 45 minutes and the audio recordings totalled 22 hours. All the interviews were recorded with interviewees' permission and then transcribed verbatim. To ensure points of interest were captured in subsequent analyses, the interviewers took notes in the interviews and immediately

afterwards and these were added to the dataset. Secondary data sources provided supplementary organisational detail and included published modern slavery statements, slavery-related policy statements, training materials and external collaboration details. Secondary data were analysed to ensure congruence with interviewee statements. Finally, to verify the credibility (Bryman et al., 2008), findings and our interpretations were presented to, and discussed with compliance committees/modern slavery governance boards of each firm and with CCS' policy unit. These focus groups lasted an average of 60 minutes. Detailed notes were taken but they were not recorded.

Template Analysis Processes

Data were uploaded onto NVivo® software for coding and analysis utilising template analysis. Template analysis is a method for thematically organising and analysing qualitative data identified in the textual data. A hierarchical structure represents relationships between themes (Brooks et al., 2015). The six stage template analysis process was adopted (King & Brooks, 2017). In stages one to four, both researchers developed an initial coding template to maximise sensitivity to the data and context. The first stage involved reading the transcripts at a detailed line-by-line level to ensure familiarisation with the data. Preliminary codes were generated in stage two and then hierarchically clustered into themes at stage three. Stage four involved collaborative discussions to review the themes and reconcile disparities in the coding schemes, leading to the population of the initial comprehensive coding template. A coding book was devised outlining the hierarchical structure and detailing each node within it to ensure coding consistency. The template was applied in stage five which entailed line-by-line coding of transcripts, notes, and secondary data. Any additional minor developments to the template that arose were discussed and agreed.

Stages five and six involve an iterative process that centres on the interpretation and theoretical grounding of the data (King & Brooks, 2017). In these stages the first-order (respondent voice)

themes were analysed in relation to extant theory to derive second-order researcher interpretations. Theoretically grounded explanations were developed and data were explored for supporting and/or conflicting evidence. In line with other interpretative approaches, the analysis process is cyclical not linear (Birks & Mills, 2015). The research process is summarised in Figure 1.

← **Insert Figure 1 approximately here** →

FINDINGS

The findings are organised around 5 meta-themes. The awareness theme covers managers' increasing cognisance of governance, risk, and humanitarian aspects of modern slavery. The actioning and action inhibitors themes explain managers' perceptions of the various factors that enable or stifle action. These factors in turn influence managers' framing of modern slavery and the way that framing is used to justify (in)action. *Visibility* extends across and interlinks with other themes and serves as a cross-cutting theme (King & Brooks, 2017). In conjunction with the awareness and framing themes, it explains how managers make sense of modern slavery in supply chains, especially when dealing with complexity and its hidden nature. Interviewees' roles in their organisations offer additional context for our findings (see Table 1). The five meta-themes and their relationships with the template hierarchy are summarised in Table 2 and detailed below.

← **Insert Table 2 approximately here** →

Awareness – “it must be important if there’s a law around it”

Managers credit legislation and sector training initiatives with having considerably increased their awareness of modern slavery. However, although they acknowledge an increase in discussions within their companies, this has not necessarily led to action. Awareness of modern

slavery covers managers' appreciation of legislation, their firm's policy and procedures, signs and indicators of exploitation, and risks relating to their labour and materials supply chains.

“Well, definitely more visible than it was because people weren't talking about it before the [Modern Slavery] Act; it's now a thing that people talk about and...it must be important if there's a law around it” (INT16).

Although firms A and B exhibited higher awareness of modern slavery, the same challenges concerning managers' perceptions of the nature and location of modern slavery, were evident across all three organisations. These issues are detailed in the visibility section below.

A training resource used in the construction industry, known as the “concrete video”¹, was attributed by several interviewees, with a considerable increase in awareness of the various signs of labour exploitation across the construction sector.

“What was really good about the concrete video...it created a real discussion saying, well, actually, when those people come on site, yes, they do turn up in a van, so we'll have to look into that...it started their minds whirring” (INT23).

While interviewees spoke favourably about the video, it had an unexpected effect of narrowing managers' awareness of the wider risk factors, signs, and contexts for modern slavery. The video crystallised managers' views into a singular portrayal of what modern slavery “looks like” within labour-based supply chains in the UK. However, that specificity inadvertently diminished managers' focus on risks and indicators in global material supply chains or other supply contexts (discussed further in the framing section below).

¹ The “concrete video” is an awareness raising video telling the stories of two survivors of modern slavery. The video was produced in 2020 by Stronger Together, a not-for-profit organisation, working with its partners to tackle modern slavery. The video is publicly available on YouTube and is widely used throughout the construction industry in worker training programmes.

Actioning – “a policy is just a set of words”

Firms recognise a raft of measures that can improve modern slavery detection and prevention. Technical measures to enhance identity verification and prevent bank account misuse have been undertaken, but these initiatives have achieved only limited success. Notably, identity checks based on the industry’s CSCS card² are hampered by the high incidence of fraud.

“The Chief Fraud Investigator from CITB came down and he said...around 20% of all CSCS cards are fake” (INT18).

Changes made to payroll systems to identify shared bank accounts, that may be an indicator of modern slavery, have also been quickly nullified through criminally controlled accounts. The construction industry features well-developed collaborative relationships with NGOs and trade associations (see Table 2). Nonetheless, the preventative measures in place have only been partially effective and are predominantly focused on UK sites, where issues are more visible, without any indication of similar measures being adopted throughout their supply chains. While none of the interviewees questioned the importance of robust ethical business practices, they also did not identify routes for tackling modern slavery in supply chains, apart from stronger legislation.

Several interviewees acknowledged disparities between their firm’s modern slavery statements and actions taken in practice. Amongst those not directly involved in producing them, the statements were often dismissed as largely irrelevant to business practice and action. Internal policies were much more influential on managers’ awareness and action. Notably, within two of the firms, internal policies and on-site processes provided significantly more detail on tangible measures to tackle modern slavery compared to their public statements.

² Construction Skills Certification Scheme (CSCS) cards are commonly used in UK construction sites but are not a legal requirement. The cards are intended to certify the holder’s qualifications but are often used for identity verification to tackle modern slavery.

“A policy is great, but a policy is just a set of words. If people aren’t living it, then it doesn’t mean anything” (INT12).

“anybody can make a statement, can’t they? But what does the statement mean to say?” (INT17).

Action Inhibitors: Supply Chain Complexity – “our supply chain is too big”

Interviewees raised a range of operational factors that limit managers’ capability and willingness to commit resources to addressing modern slavery in supply chains. The scale, and complexity of their supply chains were frequently cited as explanations for “not looking” too extensively for incidents or risks of modern slavery. The constantly changing nature of their supply chains introduces further challenges for data management.

“It’s a case of supply chains being long and complicated that even the best companies find a challenge to monitor” (INT12).

Efforts to map supply chains for materials may not adequately uncover the full extent of subcontracted labour occurring at each point in the chain. These points however, are recognised as being the most vulnerable to modern slavery risks.

“to be sure, we should put boots on the ground...go and physically see our production facilities...practically you cannot do that, our supply chain is too big” (INT19).

Action Inhibitors: Supply Chain Control – “we don’t have enough control”

Several participants raised the problems of auditing and assurance with regards to subcontracting in UK labour supply chains. Unlike manufacturing industries, construction work is predominantly project based. Labour demand fluctuates in project work and the use of temporary labour is commonplace, either to smooth demand peaks or to rectify project delays. The high turnover of temporary workers can create conditions that intensify risks of modern

slavery. There may be insufficient opportunity to recognise signs of exploitation for workers that move quickly between sites, such as groundworkers and plaster-boarders. Subcontracting of these activities exacerbates the difficulties in exerting control.

“What we are nervous about is we don’t have enough control...when it goes down the tiers...in our industry they sub it out and then sub it out again” (INT25).

Action Inhibitors: Cost and Margins – “lowest cost, at all costs”

An acute awareness of tight margins in the sector, means that managers feel under acute pressure to reduce costs above anything else.

“a sector...completely obsessed with cost, lowest cost, at all cost, and you know our customers think...that it’s very clever to drive down margin all of the time and drive down cost all of the time...you’ve got margins between 2 and 5% if you’re lucky” (INT18).

Costs of supply chain investigations were considered prohibitively expensive and a justification for the lack of material action. Corporate and government customers were blamed for under-investment in modern slavery processes.

“...but everyone’s stretched...we can only go so far in terms of probing and asking questions and you might uncouple one or two instances, but it’s the difficulty of what do you do next? How do you eradicate that? We haven’t got enough people to be out there all the time checking everybody” (INT32).

“*In terms of business integrity, modern slavery and all the other things, if we could turn that in to a proper selling point, that customers actually held dear, and actually influenced their decision-making, I think the world would be a better place*” (INT19).

Visuality – “what does somebody in modern slavery look like?”

Visuality is recognised as a central theme, intersecting the other four meta-themes. Visuality establishes a connection between the challenges of perceiving modern slavery – including its visual manifestations – and the complexity of supply chain structures (see Table 2). Interviewees used several terms related to visuality and these were explored in Nvivo through a related-terms text search. Examples include:

- Terms associated with the visual appearance of potential victims: “look”, “look of”, “look like”.
- Terms linked to attempts to recognise potential victims: “see”, “seeing”, “looking”, “spot”, “spotting”.
- Terms reflecting cognition or educational efforts: “show*”.
- Terms signifying active avoidance, passive overlooking, or lack of information: “blindness”, “blind-spot”, “blind-eye”.

Managers stressed the difficulties faced in noticing people who were potentially being exploited: “No one actually knows what a [modern] slave look like” (INT24) (See also Table 2). Managers perceive difficulties associated with detection and the subsequent investigations into cases where modern slavery is found or suspected. The potential criminal ramifications of cases, raise concerns for personal safety. These difficulties reduce managers’ inclination to see and look for modern slavery in their supply chains. Managers reduce their scope of observation (turning a blind eye), resulting in ‘blind-spots’ in their perceptions. The concept of blindness encompasses the difficulties of seeing and the tendencies to avoid looking.

“Well, they’ve got all these policies, so it’s fine, actually they don’t see the further risks down the supply chain, and I think that’s potentially our blind spot at the moment” (INT17).

“They don’t want to risk harm to their families, or their friends, or whatever, and maybe people turn a blind eye because they don’t want hassle... it’s not like health and safety... you don’t think...I might...get hurt by doing [reporting] this” (INT24).

This same unwillingness to see is expressed in relation to beliefs:

“I still don’t think that it [modern slavery] is something that a lot of people believe in, or don’t want to believe in...” (INT24).

Managers were sceptical that their firm’s efforts to discover modern slavery were being directed effectively. The majority of initiatives were targeted at their own, heavily regulated UK construction sites, yet these large firms believed these were low risk sites and perceive greater risks for SMEs.

“There is still high risk there, because of the [weak] checks that are done...they can get away with a lot more...generally, they [SMEs] go under the radar” (INT28).

Finally, visibility also embraces the concept of supply chain transparency that is the foundation for the reporting requirements in Section 54 of the UK’s Modern Slavery Act. One manager expressed strong reservations about transparency:

“I genuinely hate the phrase [transparency], it’s completely meaningless...I want to be honest with you, we’re not a transparent business. I don’t think many businesses are...but maybe that’s a conversation about capitalism” (INT24).

Framing: Through Example – “it’s people outside the UK”

The action inhibitors and awareness challenges not only limit meaningful action, they also impact the way managers frame the phenomenon of modern slavery, and this framing provides the basis through which they justify their subsequent action, or inaction.

In the case of the educational concrete video, discussed above, an unintended consequence of its concentration on UK labour is that it inadvertently narrows managers' framing of modern slavery. Interviewees were quick to talk about UK labour issues, but typically needed to be asked about global supply chains, where references were often vague. They were uncertain of where to look and how hard they should look for signs of modern slavery, and interestingly, their sense of commitment and agency diminished as the distance from their immediate context increased.

“That’s where it starts to become more of an issue because you’re not dealing directly with a UK workforce. It will be somewhere that’s in Europe...in the past they’ve had chemicals from China, so that then starts all your thoughts of issues the further east you go” (INT9).

“I think a lot of people think ‘oh it doesn’t affect the UK, it’s people outside the UK’, so when you work with suppliers from countries like in the Far East and Eastern Europe and places like that, people have a perception of how they may treat their employees” (INT13).

Managers provided ambiguous geographic references, such as “somewhere” and “further east”, and there were negative connotations in terms such as “all sorts of issues”. However, there was a general absence of unprompted discussion of overseas instances, indicating a differentiation between “us” (UK) and “not us” (non-UK), with seemingly greater concerns for domestic instances of modern slavery.

Framing: Through Health and Safety Analogy – “The Government has got to make us”

Managers use comparative framing to make sense of the Modern Slavery Act and its importance. Analogies were drawn with the gradual evolution and tightening of health and safety legislation. There is a strong sense that health and safety compliance is a fundamental priority for all firms and that it has gained full legitimacy within business cultures and processes.

“[health and safety] has become fully embedded within every business because there is policing around it” (INT22).

“People don’t even think about it, you know...they automatically put on the boots, put on the hat, put on the hi-vis, and I think that that was really generated by, apart from a certain amount of conscience, it was also legislation...and I think [that’s] the only thing that’s really going to change modern slavery” (INT1).

The analogy reflects, or perhaps causes, managers’ sense that modern slavery legislation is in its early stages, and it will take considerable time to attain the same status as health and safety legislation. These analogies convey the message of a gradual increase in compliance over an extended duration, rather than immediate and extensive action.

“An example that everyone would use would be health and safety. If you went back 50 years, there was more freedom...everything has changed now” (INT25).

“I think it can be done [combatting modern slavery], but it has got to be done in the same approach as health and safety, but that took a long time” (INT15).

Only one manager indicated that their sub-contracting procedures treated modern slavery with a seriousness comparable to that of health and safety. However, they were unable to provide evidence to substantiate this “same gravity” assertion:

“The fact that we’ve put it in our contract shows that we are aware of it and it’s something that’s important to us, same as health and safety, and it gets the same gravity” (INT1).

Managers are adopting a wait-and-see approach to tackling modern slavery with the expectation that more stringent legal requirements will eventually emerge.

“...and we’re [construction industry] almost like: ‘we’ll react once someone enforces it’. I do think the Government has got to make us do stuff. I think we’re an industry that, once an accident happens, or something major happens, we’ll think we better do something

now...normally that is led by the Government, just as we're seeing with Grenfell³" (INT25).

Managers struggled to extend the health and safety analogy to visibility of modern slavery. Unlike instances of modern slavery, health and safety injuries are often very visible, as is protective clothing (hard hats, hi-vis jackets, boots, protective eyewear etc).

"The difficulty with modern slavery is knowing that you have had an accident" (INT9).

The health and safety analogy highlighted a moral imperative, and managers recognised that this is a human issue with a human impact, not just a business problem: "You've just got to look after each other...and that flows through to the sub-contractors" (INT2).

"You've got to be looking after other people involved in your supply chain... (ponders) realistically I don't think that ever happens. People don't understand it well enough to know what it is, what to look for, how to check things, so I don't think it gets as much [attention] as it should" (INT9).

In summary, the interplay of visibility challenges and the action inhibitors combine to increase managers' sense of powerlessness to act. By framing through analogy, managers provide themselves with a convenient hook to both recognise a moral imperative for action and rationalise inaction until external actors, such as policy makers, provide them with additional agency to act.

³ On 14 June 2017, a fire broke out in the 24-storey Grenfell Tower residential apartment block in West London, UK, killing 72 people and injuring over 70. An official public inquiry examining the circumstances leading up to the fire found that the cladding on the building led to the spread of the fire. The case led to widespread criticism of safety (de)regulation and the transparency of contracting and subcontracting processes.

DISCUSSION

Managers' sensemaking of modern slavery is inhibited by supply chain complexity, lack of control, and resource issues. These operational barriers are compounded by visibility issues relating to how and where managers should look. In the face of this complexity managers adopt analogies and simplified cognitive frames (Logemann et al., 2019). This section has two primary objectives. Firstly, we interpret the findings through the lens of the three sensemaking stages: scanning, interpreting, and responding (Hahn et al., 2014), to establish how managers' sensemaking has led to convenience framing and a rationalisation of inaction. Secondly, recognising the construction industry's concerns over narrow profit margins, the theoretical perspective is extended to consider sensemaking within the context of paradoxical sustainability and financial objectives. By adopting the paradox perspective, we discuss the roles of legislation and corporate strategy in disrupting convenience framing and triggering substantive action.

Action Inhibitors: Spatial

Counter-intuitively, awareness-raising initiatives can narrow managers' scanning and interpreting activities, consequently limiting their responses. Visual cues associated with exploitation within UK labour supply chains heightened awareness, but to the detriment of vulnerable workers in global materials supply chains. Although the "concrete video" increased awareness of modern slavery in the UK, it had the unintended consequence diverted attention away from the less visible workers in supply chains. Managers experience psychological distancing (Simpson et al., 2021) from these "other" workers (Carrington et al., 2021), who are geographically and spatially separated by each contractual link in the supply chain. This narrowed sensemaking interpretation has constrained action (responding). Such commonly shared framing in sensemaking can develop legitimacy and quickly become normalised (Cornelissen et al., 2011).

Action Inhibitors: Temporal

Mechanisms such as analogies and metaphors underpin sensemaking processes and are assumed to be a precursor to action (Cornelissen et al., 2011). However, we encountered a recurrent analogy that inhibited action. The parallels drawn with the long evolution of UK health and safety legislation implies that managers perceive that the TISC requirements within the UK's Modern Slavery Act are seen as a future ideal, rather than a current necessity. Although managers express their support for the Modern Slavery Act, they regard it as a preliminary step toward stronger legislation that will unfold gradually, analogous to the trajectory of health and safety legislation.

The unquestioned conformance with health and safety legislation, ensures that all firms in the sector face similar costs, normalising this as “common sense” (Vaara & Whittle, 2022). Health and safety costs are factored into tender pricing, ensuring that there are no significant competitive disadvantages from investing in health and safety measures. In contrast, acting (responding) to investigate and tackle modern slavery within supply chains is regarded as discretionary and exposes firms to costs that may not be incurred by their competitors.

Convenience Framing

We define convenience framing as the (intended or unintended) adoption of a cognitive frame that rationalises a constrained, delayed, or avoided response. Convenience framing constitutes an activity at the interpretation stage of sensemaking that inhibits subsequent action. The process of reflecting on action is a fundamental aspect of sensemaking (Thurlow & Mills, 2009). Convenience framing can interrupt reflection. In these cases, as illustrated in Figure 2, future-oriented sensemaking remains unchanged, possibly contributing to the development and reinforcement of stereotypes (Brown et al., 2015).

Convenience framing may be subconscious, particularly in the context of modern slavery where visibility issues are prevalent, but it may also be expeditious for managers. By deferring,

rather than rejecting action, managers rationalise their beliefs that their businesses are fundamentally ethical whilst avoiding the financial implications. By arguing that stronger action depends on extended legislation managers justify their inaction and shift responsibility to the Government, thereby extending the plausibility of their framing (Weick, 1995). Such framing helps to explain a lack of substantive action reported in modern slavery statements (Birkey et al., 2018; Meehan & Pinnington, 2021).

Faced with competing messages from internal and external modern slavery sensegivers, it may be that a framing contest exists (Vaara & Whittle, 2022). However, in light of the temporal distancing findings, it seems instead that managers are adopting a wait-and-see approach, rather than experiencing anxiety-based paralysis in the face of competing demands (Luscher et al., 2006). Nevertheless, the longer that convenience framing persists, the greater will be the need for sense-breaking to disturb the status-quo and establish a new action-oriented logic (Schildt et al., 2020).

← **Insert Figure 2 approximately here** →

Paradoxical Objectives

Symbolic reporting and limited supply chain action to tackle modern slavery have been extensively reported in the literature (Flynn & Walker, 2021; Huq & Stevenson, 2020; Meehan & Pinnington, 2021; Pinnington et al., 2023; Voss et al., 2019). These responses constitute an established “common sense” (Vaara & Whittle, 2022). Convenience framing maintains the perception that significant investment to tackle modern slavery in supply chains is not currently financially justified. To disturb this status-quo and establish a “new sense” (Ibid.) where supply chain due diligence becomes the norm, managers must be convinced that modern slavery objectives are not incompatible with financial objectives. This necessitates longer term, higher-order framing of modern slavery that transcends business-case logic through strategically valued and ring-fenced sustainability objectives (Xiao et al., 2019). Higher-order framing can

realise synergistic financial and non-financial benefits through an integrated approach to supply chain risk management and non-financial reporting.

Supply chain mapping is fundamental to Human Rights Due Diligence (HRDD), but it can be costly. Under a paradox perspective, firms can avoid moral and financial tensions by assimilating other risk management and reporting activities relating to supply chain operations, for example, supplier stability risks, anti-bribery assurance, and sustainability initiatives. Furthermore, mapping can also lead to more efficiently structured and cost effective supply chains (Swift et al., 2019). Firms may also consider that an integrated approach to mapping and supply chain management, beyond tier-one, is a proactive response to forthcoming EU due-diligence legislation, which is set to impact supply chains internationally.

Stronger legislation and enhanced public procurement standards have the potential to legitimise improved corporate responses to modern slavery reporting (Pinnington et al., 2023). However, legislation incorporating personal accountability of executives, similar to that found in UK health and safety legislation, may ultimately be the crucial factor in establishing the same sort of systemic power structures (Schildt et al., 2020). Director accountability would drive a hegemonic discourse sufficient to ensure managers' unquestioned commitment. Only when there is unquestioned "common sense" conformance to legitimate legislation, will managers be fully motivated to learn how and where to see, and to undertake substantive action independent of business-case logic.

THEORETICAL CONTRIBUTIONS

The study identifies convenience framing as an additional facet of sensemaking, thereby extending the emerging stream of research on sensemaking of paradoxical objectives (e.g. Hahn et al., 2014; Xiao et al., 2019). The concept of convenience framing contributes a contrasting perspective to the influence of the three stages of sensemaking on decision-making

(Hahn et al., 2014). It illustrates how framing can be used to circumnavigate explicit decision-making, which in turn compromises subsequent progression of sensemaking.

As situational complexity increases, managers' decision-making becomes increasingly limited by bounded-rationality and more reliant on simplified framing. In social sustainability contexts, decision-making is compromised by paradoxical objectives. In these circumstances, it becomes convenient for managers to frame problems in a way that rationalises the constraint, delay, or avoidance of action. The sensemaking literature predominantly focuses on change management situations in which scanning and interpretation processes impact and result in action (Hahn et al., 2014). Through convenience framing, we suggest how distancing mechanisms (geographic and temporal) are used to rationalise inaction. Such framing disrupts the sensemaking cycle by compromising subsequent reflection and interpretation. Compromised reflection can lead to cognitive shortcuts in decision-making (Bird & Soundararajan, 2020). Convenience framing identifies the rationalised avoidance or deference of action, and thus is differentiated from concepts such as organisational paralysis, where complexity and conflicting pressures lead to anxiety-based inaction (Luscher et al., 2006).

In rationalising inaction, managers accept the moral imperative for addressing modern slavery in supply chains and accept the need for action, but only when conditions are right. This suggests it is more subtle than simple suppression of sustainability objectives (Xiao et al., 2019). These insights into how decision-making and action may be avoided, without changing complex and ambiguous objectives supplements the notion of contextualisation, which involves making explicit pragmatic decision to ameliorate a sustainability target (Xiao et al., 2019).

The study identifies the roles that strengthened legislation could play in relation to sensemaking processes; firstly, by delegitimising inaction associated with convenience framing, and secondly, through the effect of mandatory requirements on sensemaking of paradoxical

objectives. Legislation focused on specific response deficiencies will act as a trigger (Maitlis & Lawrence, 2007). Mandatory requirements can circumvent business-case logic, thereby reinforcing the case for adopting a higher-order paradox mindset that enables innovative and holistic approaches.

Our research explains how managers' sensemaking processes act to thwart substantive action in complex situations, extending recent studies of modern slavery statements that report a lack of substantive action (Birkey et al., 2018; Meehan & Pinnington, 2021). The study addresses a call for both labour and product supply chains to be considered (LeBaron, 2021). It is one of the first empirical investigations that directly evaluates managers' attitudes and their activities to tackle modern slavery, departing from the use of published corporate statements in research studies (e.g. Flynn, 2020; Flynn & Walker, 2021; Meehan & Pinnington, 2021; Rogerson et al., 2020; Stevenson & Cole, 2018). Through our concept of visibility, the study addresses calls for research recognising invisibility as well as visibility in supply chain issues (Quattrone et al., 2021).

IMPLICATIONS FOR POLICY AND PRACTICE

To prevent modern slavery objectives from being subverted by profit objectives, executives must contextualise modern slavery objectives within the broader framework of sustainable supply chain management. By acknowledging connections between modern slavery reporting and other NFR requirements, and by adopting a multifaceted approach to supply chain risk assessment, the rationale for implementing supply chain mapping and management is established. This aggregation potentially breaks the current deadlock, where many firms manage supply chains only at tier-one, thereby enabling meaningful discovery and remediation processes.

Where policymakers recognise the need for transcending paradoxes within firms, policy supporting initiatives can be directed toward encouraging firms to adopt a meta-view of risk assessment and NFR. Firms can be encouraged to take an aggregate perspective through education and training, further extending NFR mandatory requirements, active management of public-sector supply chains and most importantly, by linking NFR guidance with the UK's Modern Slavery Act Section 54 guidance (HMG, 2018). The chokehold of financial objectives can be released through stronger legislation to ensure that the governance regime legitimacy is strong enough that business leaders do not perceive TISC to be optional. Legitimising TISC, as in the case of health and safety legislation, will enable firms to manage finance–ethics paradoxes by building costs into commercial pricing. Instead of defending ethical action through complex business cases, it would be seen as essential work. Further modern slavery legislation needs to be targeted at the areas where firms currently show the least inclination to invest, such as supply chain mapping, auditing, and key performance metrics (Pinnington et al., 2023).

SOCIETAL IMPLICATIONS

Dominant organisations at the head of global supply chains have helped to create the economic conditions for modern slavery persistence (Crane, 2013). However, they also have the power to regulate those chains. The primary purpose of supply chain transparency legislation is to protect vulnerable groups, globally, from labour abuse. The supply chains of organisations located within any one jurisdiction, act as a proxy through which policy makers can achieve extra-jurisdictional influence. The UK Modern Slavery Act 2015 has helped to increase corporate awareness but has realised only limited benefits to society globally. Elsewhere, stronger legislation is being enacted, particularly in the EU, but there is a danger that the associated costs are passed upstream, exacerbating the economic conditions that lead to labour abuse (Schleper et al., 2022). Our study indicates that businesses are expecting stronger

legislation, but legislation needs to be framed to ensure that focal firms demonstrate their own direct investment in counter-measures, and report evidence of upstream benefits.

For firms wanting to ensure that ethical-business costs are borne equally by competitors, it is in their interests that NGO monitoring activities are enabled. Transparency plays a pivotal role in facilitating NGO activities, to the extent that any attempts to compromise transparency are considered unethical (Islam & Van Staden, 2022). It is important that legislation is framed to help businesses internally, to resolve the financial-sustainability paradox. This approach would encourage meaningful investments and action benefiting the most vulnerable in society.

LIMITATIONS AND FURTHER RESEARCH

Findings are likely to have (caveated) applicability to other industries in a modern slavery context, other jurisdictions, and to other NFR contexts, including responses to the climate emergency. The concept of convenience framing is potentially applicable to any complex sensemaking context where managers, anticipating subsequent clarification or stronger instruction, defer action. Issues relating to visibility and problems of perception are substantially grounded in the special characteristics of modern slavery, but are conceptually applicable to other NFR contexts where detection is challenging.

The study's limitations relate to its industry and national settings and the associated sampling. The study focused on the construction sector because it combines complex, transient labour supply chains, with complex global product supply chains. Further research should investigate issues relating to on-shore labour in other sectors with transient, low-wage labour requirements, such as agriculture and hospitality sectors, and certain manufacturing contexts such as fashion. The study's legislative context was Section 54 of the UK Modern Slavery Act and its TISC reporting requirements. This light-touch transparency legislation contrasts with HRDD legislation emerging from the EU, which mandates action, backed up by penalties. Further

research into the effects of HRDD on managers' sensemaking and decision-making will be important in establishing the most effective approach to driving ethical performance.

The study's sample was limited to managers in the three case firms. Managers discussed their perceptions of modern slavery in labour and materials supply chains, although the study did not include managers from within these firms' supply chains. Comparative, multi-tier research into sensemaking, including upstream suppliers in high-risk countries, would provide important insights. It would also enable the effectiveness of contract mechanisms verses collaboration to be contrasted, with respect to sensemaking of ethical requirements. Managers' attitudes and perceptions were investigated in firms that have not discovered modern slavery in their supply chains. Research within those few organisations that have discovered and addressed modern slavery in their supply chains should be pursued to reveal how management of the financial-sustainability paradox in those firms has enabled substantive action.

CONCLUSION

The ideals of transparent reporting of firms' activities to tackle modern slavery in their supply chains are being subverted by inaction and symbolic reporting. The more this becomes normalised as the dominant, acceptable sense, the more difficult it will be to displace. Convenience framing enables justification for the delay or avoidance of action, but also inhibits reflection on action and therefore, subsequent sensemaking. Stronger legislation is needed to establish a new dominant sense that protects modern slavery objectives from business-case logic through mandatory substantive action and reporting.

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FIGURE 1
Research Process

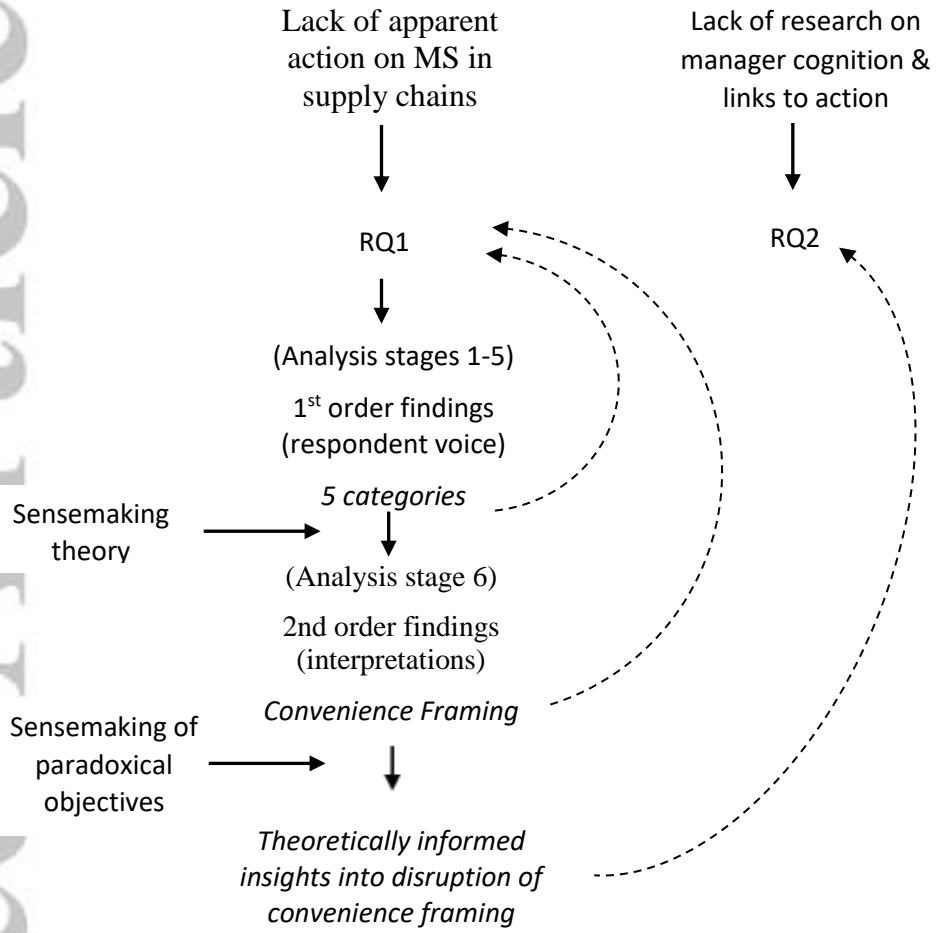


FIGURE 2
Convenience Framing

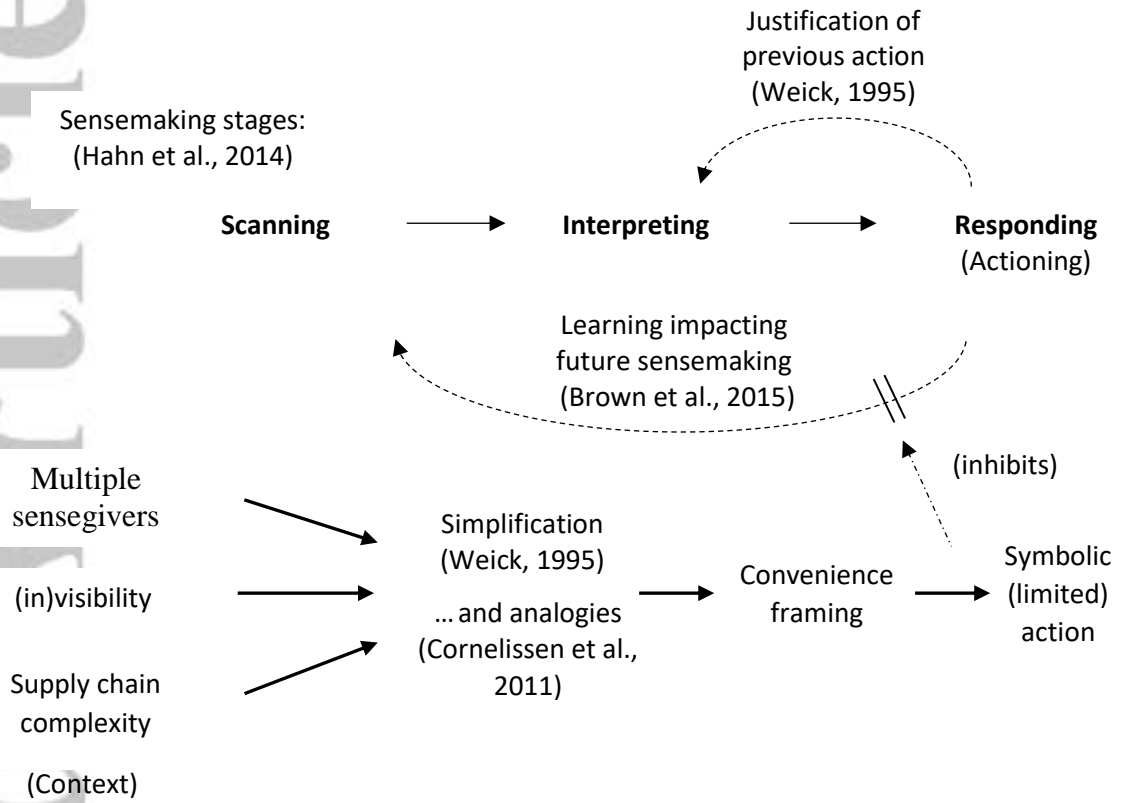


TABLE 1

Details of Selected Firms and Interviewees

Selected firms	Approx. annual turnover	Interview reference	Role
Firm A Large UK national construction group	£1.25Bn	INT-14	Director
		INT-15	Client Relationship Manager
		INT-16	Sustainability Manager
		INT-22	Procurement Category Manager
		INT-23	Head of Business Ethics
		INT-24	Head of Supply Chain
		INT-25	Supply Chain Director
		INT-26	Human Resources Director
Firm B Large multi-national construction group	£7.5Bn	INT-27	Knowledge Manager
		INT-2	Regional Contracts Manager
		INT-3	Site Project Manager
		INT-4	Client Relationship Manager
		INT-18	Head of Sustainable Procurement
		INT-19	Head of Business Integrity
		INT-20	Head of Employee Relations
Firm C Construction division UK utilities company	£1.75Bn	INT-21	Procurement Category Manager
		INT-1	Senior Engineering Manager
		INT-5	Senior Manager Procurement
		INT-6	Policies Manager Commercial
		INT-7	Commercial Director
		INT-8	Procurement Buyer
		INT-9	Procurement Buyer
		INT-10	Quantity Surveyor
		INT-11	Contracts Manager
		INT-12	Procurement Category Manager
		INT-13	Procurement Category Manager
		INT-17	Head of Procurement
INT-29	Senior manager corporate affairs		
INT-30	Senior manager innovation		
INT-31	Senior Solicitor		
INT-32	Commercial Manager		

TABLE 2
Codes and Illustrative Quotes

Illustrative Quotes	Example Codes	Meta-themes
It kind of pops up in the popular culture doesn't it...crime dramas on the television, that kind of thing (INT31)	General visibility	Awareness Appreciation of the wider issues of modern slavery in supply chains, awareness of signs, awareness of where and how to look for signs
I think if people don't see it [modern slavery] in front of their noses, it's not their issue (INT19)	Awareness or lack of	
I've read it. I've forgotten it. It's probably an indictment of me (INT21)	Awareness of statements and policies	
I recognise there's going to be hot spots of potential risk for modern slavery, so cleaning... that sort of low paid type of work (INT11)	Specific signs & hot spots	
...so that then starts all your thoughts of issues the further east you go (INT9) ...if we're talking about a factory that you know nothing about, then that's another thing (INT24)	Geographic perceptions	
...but the fact that we're going out on site, we are talking one-to-one, we're looking people in the eye (INT2)	Individual conversations	
...so I've just [reduced] 47 suppliers down to one (INT13) we have a PQQ system...there's questions about modern slavery...they are slightly blunt instruments (INT16)	Process enablers: sourcing strategy Process enablers: procurement procedures	Actioning The extent to which rhetoric leads to (or does not lead to) genuine action, and the systems and
We would then go in and audit...those [high risk] suppliers (INT17)	Enforcement: with subcontractors	

[Stronger measures] look like fines I think, and potentially prison sentences ... (INT15)	Enforcement: firms fines and punishment	process enablers of substantive action.
We'll have a few indicators but I don't think we've had the right amount of training to understand if it's a good policy, or a bad policy (INT1)	Education: general training	
We created a couple of right-to-work videos...with the CITB (INT26)	Education: increasing awareness	
...system that we're currently trialling...can identify if ID is fake or not (INT4)	Technical: Site management software	
so we have a whistle blowing platform, so anyone...can whistle blow (INT4)	Technical: Whistle blowing platform	
from a modern slavery perspective, I've sat on the original working group with the Supply Chain Sustainability School (INT18) ...we're part of the Stronger Together initiative, that's given us a lot of insight and education (INT25)	Collaborations: BREEAM; CITB; GLAA; NFB; SafeCall; Sedex; Stronger Together; Supply chain sustainability school	
the Co-op have a programme...to [employ] people when they come out of the national referral mechanism (INT15)	Bright futures Coop programme	Action inhibitors Situational, process and technical factors that impact managers capability and willingness to commit resources to addressing MS in supply chains
...that's a real challenge... we don't have a budget for modern slavery (INT32)	Cost: (Lack of) overall budget	
whilst [audit] is a good idea... I would need a business case ... (INT5)	Cost: (Lack of) audit budget	
We live in world where nothing shocks anyone anymore... I would agree with it, if there was more of an interest... with the general public (INT24)	Social climate	

We have about 10,000 supply chain partners...they will last anywhere from six months to three years (INT14)	Complexity: in organisation and supply network	
... so it's really difficult to get transparency really beyond tier 1 (INT16) Construction is so fragmented, once you get beyond tier 1, it's almost completely opaque (INT14)	Complexity: managing supply chains	
That investigation identified 3,000 linked bank accounts, overlapped with fraudulently obtained CSCS cards (INT18)	Technical: Bank accounts and fake cards	
...[everyone] has to have a CSCS card...However, there is a big issue ...[with]how easy they are to get on the black market (INT4)	Technical: CSCS cards and induction processes	
It's a global problem... supply chains are global (INT31)	Geographic factors	
[in construction] we are reinventing the wheel all the time [whereas in manufacturing] you've got a fixed factory, you've got a dedicated supply chain, you educate the people [through] continuous improvement (INT16)	Sector: Type of work and industry	
Yes, but we never seem to get anyone who ticks yes on [finding MS] (INT8)	Governance: Box ticking	
...nobody is there slapping a fine on you, if you don't take the steps that you said you were going to take... (INT26)	Governance: No consequences	
No one actually knows what a [modern] slave looks like...(INT24) What does someone in modern slavery look like? Do they have a look? (INT21)	What does MS look like	Visuality Cross-cutting theme covering: <ul style="list-style-type: none"> • how easy is it to spot? • what does it look like?

<p>...would they [local staff] be aware if they saw it happening here? (INT5)</p> <p>but the more you look for something the more likely you are to find it (INT16)</p>		<ul style="list-style-type: none"> • where should I look? • how hard should I look? • blindness (not seeing)
<p>...maybe people turn a blind-eye... (INT24)</p> <p>If you are turning a blind eye, not asking questions...are you complicit in supporting it? (INT16)</p> <p>...I think that's potentially our blind spot at the moment (INT17)</p>	<p>Blindness Blind spots Blind eye</p>	
<p>...it has got to be done in the same approach as health and safety, but that took a long time (INT15)</p>	<p>Analogy with Health and Safety legislation</p>	<p>Framing Analogies and metaphors through which managers make sense of the MSA and its importance</p>
<p>...the concrete video...created a real discussion...it started their minds whirring (INT23)</p>	<p>Education schemes (and Awareness)</p>	

Accepted Article

APPENDIX

Interview Protocol

Semi-structured interview. Prompts to explore the breadth of the phenomenon. Order may vary to suit the natural flow of dialogue. Explore new, insightful avenues of enquiry.

Perceptions. Explore interviewee perceptions of forced labour and/or modern slavery as a contemporary issue.

Prevalence. Location (geographically, structurally in supply chains, across the sector); frequency and volume.

Personal experience and knowledge. Any direct or indirect experience of victims. Training experience. Knowledge of modern slavery law and section 54. Personal views on the issue.

Detection, action, and processes. Views on victim characteristics. Knowledge of whistleblowing and remediation processes. Knowledge of, involvement with, policies and processes internally. Knowledge of external initiatives (within sector or beyond).

Supply chain management. Governance (explore contracts, supplier management, KPIs, audit processes as relevant). Ensure labour and product supply chains are explored. Sub-contractor and supply chain management beyond tier-1. Have suppliers ever been excluded (MS grounds)?

Site personnel management. Specific processes and systems to counter risks on site. Specific processes pertaining to labour agencies and sub-contracted services.

Risk. Explore perceptions of risk (unqualified), then explore reputational, operational and victim risk where not covered.

Responsibility. What more could the organisation be doing? What more could you do? Sector responsibility to self-regulate? Moral duty of individuals and firms.