

## Cookies on Modern slavery statement registry

We use some essential cookies to make this website work.

We'd like to set additional cookies to understand how you use Modern slavery statement registry, remember your settings and improve government services.

We also use cookies set by other sites to help us deliver content from their services.

Accept additional cookies

Reject additional cookies

[View cookies](#)

 **GOV.UK**

Menu ▼

**Modern slavery statement  
registry**

**BETA** This is a new service – your [feedback](#) will help us to improve it.

< [Back](#)

## VODAFONE GROUP PUBLIC LIMITED COMPANY modern slavery statement summary (2022)

▶ [Organisation address](#)

We asked the organisation a series of questions about its modern slavery statement. Its answers are published on this page as a statement summary.

▶ [What is a modern slavery statement?](#)

**Link to full statement**

[Go to full modern slavery statement on organisation's website](#)

## PDF version of the statement (optional)

**THERE IS NO PDF VERSION OF THIS STATEMENT.**

PDF statements were first introduced to the registry for the 2023 statement year.

### About this statement summary

All answers relate to the financial year covered by the statement. The organisation is responsible for all the information it provided. Some of our questions are optional, so organisations may not have answered all of them. The statement summary does not replace the full modern slavery statement – below we provide a link to the full statement on the organisation's website.

## Contents

- [Organisations covered by the statement](#)
- [Legal requirement to publish](#)
- [Statement period and sign-off details](#)
- [Recommended areas covered by the statement](#)
- [The organisation's sectors and turnover](#)
- [Number of years producing statements](#)
- [Policies](#)
- [Training](#)
- [Monitoring working conditions](#)
- [Modern slavery risks](#)
- [Finding indicators of modern slavery](#)
- [Demonstrating progress](#)

## Organisations covered by the statement

VODAFONE GROUP PUBLIC LIMITED COMPANY modern slavery statement for 2022 is a group statement covering **8** organisations. [See the full list of organisations covered by this statement](#)

## Legal requirement to publish

VODAFONE GROUP PUBLIC LIMITED COMPANY has confirmed it is required to publish a 2022 statement by law.

## Statement period and sign-off details

The statement covers the following period:  
1 April 2021 to 31 March 2022

The statement was signed off by:  
Nick Read (Chief Executive)

It was approved by the board (or equivalent management body) on:  
27 May 2022

## Recommended areas covered by the statement

Government guidance encourages organisations to cover a range of areas in their modern slavery statements, setting out the steps they're taking to address modern slavery risks in their operations and supply chains. [Read about the recommended areas in the statutory guidance.](#)

We asked the organisation to tell us which areas its statement covers.

Areas recommended by government guidance	Organisation's response
The organisation's structure, business and supply chains	COVERED
Policies	COVERED
Risk assessment	COVERED
Due diligence (steps to address risk)	COVERED
Training about modern slavery	COVERED

## Areas recommended by government guidance

## Organisation's response

**Goals and key performance indicators (KPIs) to measure the effectiveness of the organisation's actions and progress over time**

**NOT COVERED**

Partial – we have included KPIs which measure the effectiveness of our actions, but we have not included goals

## The organisation's sectors and turnover

### Sectors

The organisation operates in the following sectors:

- Automotive, machinery and heavy electrical equipment
- Financial, insurance and real estate activities
- Information technology and telecommunication

### Turnover

Its turnover in the financial accounting year of this statement was:

Over £500 million

If the organisation is a public body, this amount is based on the organisation's budget for the year of the statement.

▶ [What does 'turnover' refer to in group statements?](#)

### Number of years producing statements

The organisation has been producing modern slavery statements for the following number of years:

More than 5 years

▶ [How does this work for group statements?](#)

### Policies (optional)

We asked the organisation whether its policies include the following provisions in relation to its domestic and international supply chains, as well as its own operations.

#### Policy provisions we asked about

#### Organisation's response

**Freedom of workers to terminate employment**

**INCLUDED**

**Freedom of movement**

**INCLUDED**

**Freedom of association**

**INCLUDED**

Policy provisions we asked about	Organisation's response
Prohibits any threat of violence, harassment and intimidation	INCLUDED
Prohibits the use of worker-paid recruitment fees	INCLUDED
Prohibits compulsory overtime	INCLUDED
Prohibits child labour	INCLUDED
Prohibits discrimination	INCLUDED
Prohibits confiscation of workers' original identification documents	INCLUDED
Provides access to remedy, compensation and justice for victims of modern slavery	NOT INCLUDED
Other	For further information on our policies, see: <a href="https://www.vodafone.com/sites/default/files/2022-05/vodafone-2022-modern-slavery-statement.pdf">https://www.vodafone.com/sites/default/files/2022-05/vodafone-2022-modern-slavery-statement.pdf</a>

## Training (optional)

We asked the organisation whether it provided training on modern slavery, and who it was for.

▶ [What counts as training?](#)

We asked who the training was for	Organisation's response
Your whole organisation	YES
Your front line staff	YES
Human resources	YES
Executive-level staff	YES
Procurement staff	YES
Your suppliers	YES
The wider community	YES
Other	-

## Monitoring working conditions (optional)

Engaging with others

We asked the organisation to tell us who it engaged with to help monitor working conditions across its operations and supply chains.

<b>We asked who the organisation engaged with</b>	<b>Organisation's response</b>
Your suppliers	YES
Trade unions or worker representative groups	NO
Civil society organisations	NO
Professional auditors	YES
Workers within your organisation	YES
Workers within your supply chain	YES
Central or local government	NO
Law enforcement, such as police, GLAA and other local labour market inspectorates	NO
Businesses in your industry or sector	YES

## Social audits

We asked the organisation to tell us about any social audits it used to look for signs of modern slavery.

▶ [What are social audits?](#)

<b>Social audits we asked about</b>	<b>Organisation's response</b>
Audit conducted by your staff	YES
Third party audit arranged by your organisation	YES
Audit conducted by your supplier's staff	NO
Third party audit arranged by your supplier	YES
Announced audit	YES
Unannounced audit	NO

## Grievance mechanisms

We asked the organisation how workers in its operations or supply chains could raise concerns or make complaints.

<b>We asked if workers could raise concerns this way</b>	<b>Organisation's response</b>
--	--------------------------------

## We asked if workers could raise concerns this way

## Organisation's response

Using anonymous whistleblowing services, such as a helpline or mobile phone app

YES

Through trade unions or other worker representative groups

NO

## Other ways of monitoring working conditions

We asked the organisation whether it had any other ways of monitoring working conditions across its operations and supply chains:

Review of civil society reports (eg ASPI report and In Broad Daylight (Sheffield Hallam research into Solar Panel supply chain)) and investigation into their findings, as well as other press articles

## Modern slavery risks (optional)



**Identifying modern slavery risks is a vital step towards eradicating it. The government encourages organisations to be as open and transparent as possible, to improve understanding, collaboration and best practice around tackling this worldwide problem.**

We asked the organisation to describe up to 3 priority risks it focused on during the period of the statement, including details of the affected workers, the activity involved, and the location.

## Priority risks for this organisation (1 of 3)

Allegations of forced labour in the electronics manufacturing supply chains in China and Vietnam

### Questions we asked about this risk

### Organisation's response

#### Where it was most likely to occur

Organisation's response: Within your supply chains.

- Tier 2 suppliers  
Provide products and services to your organisation via your Tier 1 suppliers.
- Tier 3 suppliers and below  
Provide products and services to your organisation via your Tier 2 suppliers or the next higher level in the chain.

#### Who was it most likely to affect

Organisation's response:

- Women
- Migrants
- Refugees

#### In which country

Organisation's response:

- China
- Vietnam

Questions we asked about this risk	Organisation's response
<b>Actions or plans to address this risk</b>	Organisation's response: Conduct third party audits of our suppliers and selected lower tier supply chains in collaboration with our industry group JAC (Joint Alliance for CSR, formerly known as the Joint Audit Co-operation)

### Priority risks for this organisation (2 of 3)

N/A

Questions we asked about this risk	Organisation's response
<b>Where it was most likely to occur</b>	Organisation's response: NO DETAILS PROVIDED
<b>Who was it most likely to affect</b>	Organisation's response: NO DETAILS PROVIDED
<b>In which country</b>	Organisation's response: NO DETAILS PROVIDED
<b>Actions or plans to address this risk</b>	Organisation's response: NO DETAILS PROVIDED

### Priority risks for this organisation (3 of 3)

N/A

Questions we asked about this risk	Organisation's response
<b>Where it was most likely to occur</b>	Organisation's response: NO DETAILS PROVIDED
<b>Who was it most likely to affect</b>	Organisation's response: NO DETAILS PROVIDED
<b>In which country</b>	Organisation's response: NO DETAILS PROVIDED
<b>Actions or plans to address this risk</b>	Organisation's response: NO DETAILS PROVIDED

### Indicators of forced labour (optional)

We asked the organisation whether its statement refers to finding any International Labour Organization (ILO) indicators of forced labour.

► [What are ILO indicators of forced labour?](#)

ILO indicators we asked about	Organisation's response
Abuse of vulnerability	NO
Deception	NO
Restriction of movement	NO
Isolation	NO
Physical and sexual violence	NO
Intimidation and threats	NO
Retention of identity documents	YES
Withholding of wages	YES
Debt bondage	YES
Abusive working and living conditions	NO
Excessive overtime	YES
Other	-

### Actions taken in response to finding ILO indicators

We asked the organisation to tell us whether its statement refers to any actions it took after finding indicators of forced labour

Actions we asked about	Organisation's response
Financial remediation, including repayment of recruitment fees	NO
Change in policy	NO
Change in training	NO
Referring potential victims to government services	NO
Supporting victims via NGO	NO
Supporting investigations by relevant authorities	NO
Other	See page 9 of our Modern Slavery Statement: <a href="https://www.vodafone.com/sites/default/files/2022-05/vodafone-2022-modern-slavery-statement.pdf">https://www.vodafone.com/sites/default/files/2022-05/vodafone-2022-modern-slavery-statement.pdf</a>



## Demonstrating progress (optional)

We asked the organisation how its statement demonstrates progress over time in addressing modern slavery risks. They provided the following answer:

Modern slavery is a hidden risk, making the evaluation of progress complex. We use various key performance indicators (KPIs) to monitor and report on the effectiveness of our policies and procedures in this area. For more information on why we selected each KPI see: <https://www.vodafone.com/sites/default/files/2022-05/vodafone-2022-modern-slavery-statement.pdf>

[Contact us](#) [Cookies](#) [Privacy Policy](#) [Accessibility statement](#)

**OGL** All content is available under the [Open Government Licence v3.0](#), except where otherwise stated



[© Crown copyright](#)