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# **Easy Guide – The UK Modern Slavery Act: How amfori Members Should Respond**

# The UK Modern Slavery Act:

## What you need to know

Introduced in 2015, the [UK Modern Slavery Act \(MSA\)](#) is designed to prevent modern forms of slavery and protect victims. The Act also includes the requirement to publish a Slavery and Human Trafficking Statement (“the Statement”).

The Statement, referenced in Section 54 of the Act, must contain details of the steps that the organisation has taken to identify and eradicate modern slavery from both its own business and its supply chains. The MSA states that:

- all businesses with a turnover of £36m or more are required to publish a Statement
- the Statement must be updated every year
- the Statement must be published on a prominent place on a company website / home page
- board approval must be given with the date
- a company director signature is required, with their name, job title and the date

## How we can help

The amfori Business Social Compliance Initiative (amfori BSCI) already has the tools in place to help you draft an accurate Statement and support your broader reporting activities.

**We have drafted a [Statement template](#) that provides clear guidance on how to plan and structure your Slavery and Human Trafficking Statement. As well as this template, which can be found on the amfori website, amfori BSCI also supports with:**

- monitoring and reporting
- grievance mechanisms and remediation
- implementing effective supply chain management systems
- training and capacity building

This Easy Guide will lead you through the process of the Slavery and Human Trafficking Statement, highlighting its benefits and risks.

Going through this reporting process will help your organisation recognise its contribution to United Nations Sustainable Development Goals such as:



## Glossary

### The Slavery and Human Trafficking Statement

The report to be issued by relevant commercial organisations under the conditions indicated in the UK Modern Slavery Act Part 6, Section 54.

### Modern Slavery

A term that encompasses slavery, servitude, forced or compulsory labour and human trafficking.

### Forced Labour

Any work or services people are forced to do against their will, usually under threat of punishment.

### Debt bondage/bonded labour

People trapped in poverty borrow money and are forced to work to pay off the debt, losing control over both their employment conditions and the debt.

# Follow these 4 steps

## Step 1: Assess if your organisation falls under the MSA definitions



### Structure

Your organisation is defined as a corporate body or partnership, acting independently or as part of a group structure, that 'carries on a business, or a part of a business, in the United Kingdom. Business includes a trade or a profession.'

More details can be found under UK MSA Part 6 section 54 (12).



### Turnover

Your organisation has a total turnover of over £36 million, after the deduction of taxes and trade discounts on the supply of the relevant goods and services. The turnover includes all subsidiaries, including those operating outside of the UK.



### Business scope

Your organisation is a commercial organisation that supplies goods or services.



### Geographic scope

Your organisation carries out business, or parts of business, in any part of the United Kingdom, regardless of the origin of the business.

## Step 2: Decide which Statement your organisation should choose



### Actions taken

A Statement on actions taken to ensure slavery and human trafficking is not taking place in any part of your business or supply chains.



### No actions taken

A Statement indicating your organisation has not taken any such steps.

Conducting a quick assessment on the pros and cons can help guide you to the best approach. See below for an example:

|                                   | Benefits  | Risks  |
|-----------------------------------|---|--|
| <b>Statement of inaction</b>      | You are not burdened with detailing how your company eliminates slavery or human trafficking                            | Stakeholder, consumer, and media pressure could result in negative publicity |
| <b>Statement of actions taken</b> | You can protect and enhance your organisation's reputation, and benefit from increased investor and customer confidence | Solid evidence is necessary to avoid a backlash that contradicts your claims |



**IMPORTANT:** If you are new to the amfori BSCI System (e.g., you have not started developing internal procedures, mapping your supply chain, etc.), you may still opt for a Statement of actions taken. In which case, you should indicate the concrete actions you plan on taking to ensure slavery and human trafficking do not occur in any part of your own business and its supply chains.

## Step 3: Map amfori BSCI tools against each part of the Statement<sup>1</sup>

|   |   |  |   |   |
|---|---|--|---|---|
| <b>1</b><br><b>Business and supply chain structure</b><br>Use supply chain data from the <a href="#">amfori Sustainability Platform</a> | <b>2</b><br><b>Internal policies for modern slavery</b><br>Refer to the <a href="#">amfori BSCI Code of Conduct</a> | <b>3</b><br><b>Due diligence and remediation</b><br>Refer to amfori BSCI monitoring and continuous improvement on the <a href="#">amfori Sustainability Platform</a> | <b>4</b><br><b>Assessment of risks</b><br>Refer to the amfori ESG Risk Compass on <a href="#">amfori Insights</a> | <b>5</b><br><b>Key performance indicators</b><br>Use data on assessments and their outcomes from the <a href="#">amfori Sustainability Platform</a> |
|---|---|--|---|---|

## Step 4: Manage the publication



### Content

The Statement should be succinct, transparent, and easy to read. Statements can refer to supporting links and should avoid overstating your company's actions. The Statement must cover your whole financial year. However, if your organisation has only recently undertaken any activities, you may choose to produce a Statement noting that the activity only relates to part of the financial year.



### Approval and signature

The Statement must be approved by your board of directors (or equivalent management body) and signed by a director (or equivalent) if the organisation is a body other than a limited liability partnership. For other types of organisations, see UK MSA Part 6, 54 (6) b, c, d.



### Cycle

It is strongly recommended that once you begin publishing your annual Statement, you continue to do so, even if your turnover falls below the minimum threshold of £36 million.



### Publication

#### Modern slavery statement registry

The Home Office has launched [the registry](#) to make it easier for people to find Modern Slavery Statements.

#### With website

You must publish the Statement and include a link in a prominent place on your organisation's website.

#### Without website

You must provide a copy of the Statement to anyone that has made a written request and must do so within 30 days of the request being received.



### Timing

Your organisation will have to publish the Statement annually, no later than six months after the end of its financial year.

<sup>1</sup> [Transparency in Supply Chains: A practical Guide](#), Home Office, 2021

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