


Modern slavery and the coronavirus pandemic

The Home Office has published a Guidance document for businesses on publishing a modern slavery statement and addressing modern slavery risks in the context of the COVID-19 pandemic.

 24 April 2020

Please note: the information contained in our legal updates are correct as of the original date of publication

The Home Office has published a Guidance document for businesses on:

- publishing a modern slavery statement; and
- addressing modern slavery risks

in the context of the COVID-19 pandemic.

The Guidance states that during the pandemic, it is essential that businesses continue their activity to identify and address risks of modern slavery in their operations and supply chains. As well as focusing on the health and safety of their workers and those in their supply chains, businesses are advised of the need to consider how fluctuations in demand and changes in their operating model may lead to new or increased risks of labour exploitation.

Publishing a modern slavery statement

The Home Office has acknowledged that challenges presented by the pandemic may mean that some businesses will not be able to publish their modern slavery statement within the prescribed timeframe (being 6 months from a business' financial year end), for example, if they have reduced staff capacity.

It states that businesses which need to delay the publication of their modern slavery statement by up to 6 months due to coronavirus-related pressures will not be penalised and that their statement (when published) should state the reason for any delay. Information on addressing and reporting on risks is included within the Guidance.

Addressing modern slavery risks

The Guidance states that some workers may be more vulnerable to modern slavery during the pandemic. It lists the following as issues businesses should consider:

- the health and safety of workers, including throughout the supply chain – adopting relevant local and national government policies and laws, for example on social distancing and SSP, in order to prevent the spread of coronavirus.
- Supporting suppliers – businesses should prioritise engagement with suppliers, including paying for orders already in production where possible. The Guidance notes that late cancellations can lead to workers not receiving pay for work they have completed.
- Grievance procedures – workers should still be able to access grievance procedures.
- Recruitment – rigorous checks should continue to be applied when suppliers are seeking to recruit at pace in order to meet increases in customer demand.
- Emerging risks – businesses may need to undertake new risk assessments or reconsider the prioritisation of previously identified risks in the context of a rapidly changing landscape.

A link to the Guidance is below:

Contact



Raymond Silverstein

Partner

raymond.silverstein@brownejacobson.com

+44 (0)207 337 1021

Related expertise

Services

Commercial law

Criminal compliance and
regulatory

Employment

Modern Slavery Act