

Modern Slavery Act - reporting obligation

What should your employees do if an incident of modern slavery is identified within your organisation or its supply chains?

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As we have outlined in our previous [updates](#), section 54 of the Modern Slavery Act 2015 (MSA) came into force on 29 October 2015 and is designed to increase supply chain transparency and place greater accountability on organisations for the condition of their supply chains. We have previously [outlined those organisations](#) that are caught by section 54, and have recommended that staff are trained on the MSA.

But what should your employees do if an incident of modern slavery is identified within your organisation or its supply chains?

Employees

We recommend that employees are encouraged to report any concerns immediately to their employer in the first instance. Your organisation's anti-slavery policy should make clear to employees the appropriate reporting method: this might be via their line manager, a named compliance officer or via a confidential helpline.

Employers

Once an incident of modern slavery is reported, your organisation should consider it carefully and if appropriate progress reporting of it as follows:

In the UK - If a specific case of modern slavery is identified it should be reported immediately to the police - on 101. However 999 should be called if potential victims are in immediate danger.

The Modern Slavery Helpline (0800 0121 700) also offers information and guidance on action to take where someone is either a victim themselves or suspects they have identified an instance of modern slavery.

Outside of the UK - The appropriate response to modern slavery identified or suspected abroad will depend on the local circumstances and consideration of what will produce the safest outcomes for the potential victims; it may involve liaison with local industry bodies, trade unions, non-governmental organisations (NGOs) or other support bodies, or contact with law enforcement bodies. This can present a challenge to a business which might consider it lacks the skills and expertise to influence suppliers or take appropriate steps to improve matters on the ground. You should always be mindful of the economic influence and control the organisation holds over those who may be committing those crimes.

Relationships with supply chain: using commercial pressure

Where local company's appear to be failing to address concerns raised, then your organisation should seek to offer more guidance, training and even business incentives to tackle outstanding issues, and – if after such support progress is not made - should carefully consider their commercial relationship with that supplier going forward.

These considerations and any actions taken should be recorded in your organisation's subsequent s54 statement.

Further guidance

The following guidance (produced by the Organisation for Economic Cooperation and Development (OECD)) may also be useful in more widely informing your organisation on principles and standards for responsible business conduct:

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