



Modern Slavery in the Supply Chain

We provide clarity in a world of Supply Chain complexity so that businesses can meet regulatory requirements. Our clients trust us with their compliance needs, and expertise with the Modern Slavery framework.

Modern Slavery

Procurement strategy can create regulatory barriers, along with the complexities of visibility within any Supply Chain. Let Livingston expertly break these chains, so you can focus on growing your international trade. We offer expertise in alignment with regulatory strategies, working with our clients to ensure compliance. Including a proactive process to eliminate Modern Slavery and to have transparency in your Supply Chain,

UK Modern Slavery Act 2015

The UK Modern Slavery Act came into force on 29 October 2015. It consolidated existing UK legislation on slavery, child labor and human trafficking and defined slavery as existing when a person is 'held' or 'forced' against their will by another person who knows or ought to know that the other person is being held in slavery or servitude or forced to perform compulsory labor. It introduced an Anti-Slavery Commissioner, new measures to protect victims and stiffer penalties for those convicted.

More controversially it also included a requirement for commercial business to report on what they are doing to combat slavery – the Section 54 'Transparency in Supply Chains' Statement.

Section 54 – 'Transparency in Supply Chains' statement

Requires certain businesses to produce a slavery and human trafficking statement each year. This statement should set out what the steps a business has taken in the last financial year to ensure modern slavery and human trafficking is not taking place in their business or supply chains.

Does section 54 apply to my business?

A commercial business that supplies goods and services, with an annual turnover that exceeds £36 million and that carries on its business or part of its business in the UK is covered by section 54. Therefore, corporations, partnerships and group companies, including those with a non-UK based parent fall within the remit of the Act. If a business meets the criteria for one year it is required that in future years, it will continue to produce a statement and therefore continue to take steps to prevent slavery and human trafficking in its business.

Even if a business does not meet the criteria, it is likely that it will need to provide this information to its suppliers or customers who do meet the criteria for one of the following, although this is not a complete listing.



- Their revenue could trigger the “Transparency in Supply Chain” from Parent Ownership, A parent company is a company that has a controlling interest in another company, giving it control of its operations;
- The Social Responsibility programme requires transparency in the supply chain;
- jurisdiction requirements.

This far-reaching UK Modern Slavery legislation could affect companies with a presence in the UK, if their turnover exceeds £36 million.

In Addition to the UK, Australia and France also includes slavery legislation the Modern Slavery Bill 2018 and France Duty of Vigilance Law 2017

U.K. Penalties for non –compliance?

If a business does not prepare a statement, the Secretary of State can apply for an injunction to force compliance. If a business still refuses to comply they will be deemed to be in contempt of a court order, which is punishable by an unlimited fine.

France & Australia have similar non-compliance programs and enforcement, along with growing pressure globally for other countries to bring in their own specific modern slavery legislation.

Global Trade Management

Our focus on Modern Slavery compliance goes beyond the legislation. With our Global Trade Management solutions, we become a partner with your business, and can directly manage part or all the functions that a typical Compliance department would handle. Use our experience, strict process controls and IT solutions to manage all facets of your Modern Slavery program.

Find out how WTCS can work with you as a trusted partner for all your Modern Slavery needs