



# COMPLYING WITH THE MODERN SLAVERY ACT 2015

WITH ADDITIONAL  
CONTRIBUTIONS  
FROM:



## Guide Overview:

The Modern Slavery Act (MSA) 2015 came into force on 29th October 2015, with the hope of eliminating elements of corporate slavery and human trafficking in the UK.

The following document will give you an overview of the MSA, how to prepare for government requirements and guidance for developing an anti-slavery statement, if required.

Included in this guide:

- What is the Modern Slavery Act 2015?
- An action list for SME's and large businesses
- Tips on formulating an anti-slavery statement
- What Omega Resource Group can do to help
- Additional contributions from PwC



This document is designed to help you understand everything you need to know about the Modern Slavery Act 2015 (MSA). The MSA was established to help combat the rising levels of forced and compulsory labour in the UK. This guide will offer an overview of the MSA, a recommended action list for SME's & larger businesses and guidance on developing an anti-slavery statement with advised content topics.





## What is the Modern Slavery Act 2015?

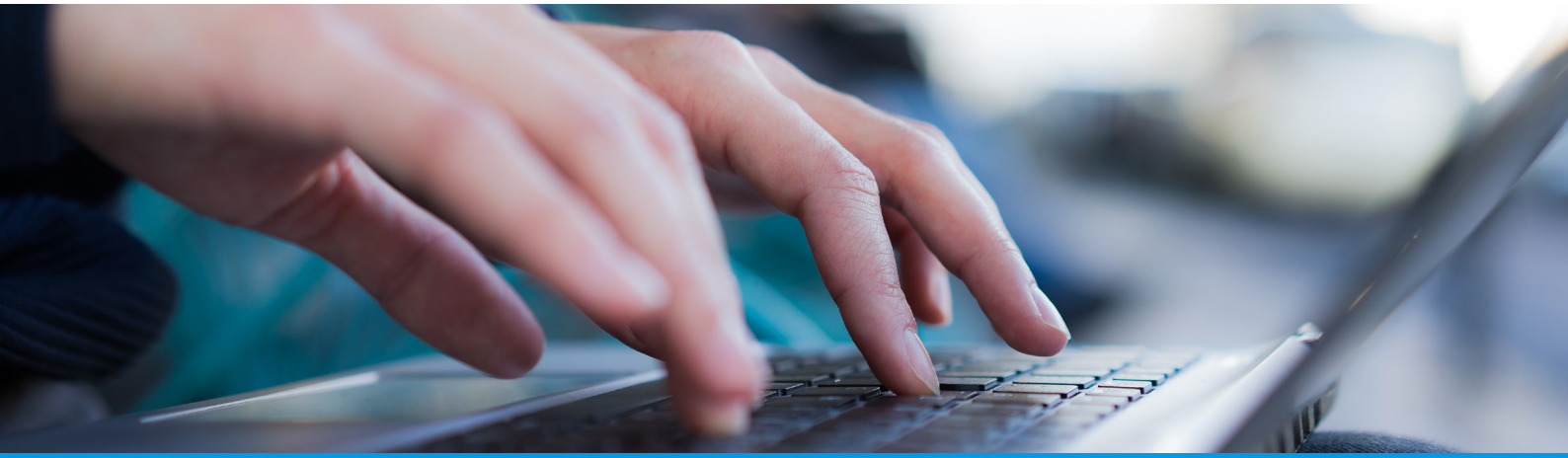
The Modern Slavery Act 2015 is aimed at fighting crimes of corporate slavery and human trafficking. These illegalities take various forms including servitude and forced labour. The UK government recognises that businesses can help combat these crimes particularly with increased transparency in supply chains.

Many organisations are already taking action to promote ethical business practices and policies that protect workers from being abused and exploited in their own organisation and global supply chains.

However, there are still far too many people in the UK being treated as commodities. Many SME's are now finding they are affected, as clients are adamant to be provided appropriate paperwork to insure that they are complying with the Act.



Those companies with a year end on or after 31st March 2016 and a global turnover of more than **£36 million per annum** (including the turnover of foreign subsidiaries), will have six months from their year-end to publish a Slavery and Human Trafficking Statement for 2015/2016, to assure that they are complying with the Act.



## Action list for SME's and large businesses:

The following action list provides key points and aspects of your day-to-day business operations to consider in order to comply with the MSA:

- Review your current contracts with your suppliers, contractors and any management companies to include a clause or provision stating that they comply with the MSA. This may well be covered with a generic clause requiring overall compliance with all relative laws to the provision and delivery of the services.
- Consider evaluating your current supply chains. Ensure that your suppliers have published an anti-slavery and human trafficking statement (if required, [see quotation box on previous page](#)). Check any processes that they have implemented in order to comply with the Act.
- For larger organisations, be sure to examine the various sectors and locations in which you operate. Make certain that you are aware of any global projects and that your compliance is certified throughout.
- For smaller organisations, it may be that implementing a more straightforward programme is a better option, to demonstrate to clients that they are seeking to comply (predominantly applicable to those in the public sector).



*"Firstly, identify what your modern slavery statement should say, and how. And second, run a risk assessment across your whole supply chain to pinpoint the biggest risks and enable actions to tackle them."*

Edward Naish | Manager, Assurance



## Developing an anti-slavery and human trafficking statement:

Creating a statement that abides with the MSA is the final phase to complying with the Act.

Keep the statement succinct, but cover all the relevant points - if you can provide appropriate links to relevant publications, documents or policies for your organisation, do so. Remember to write the statement in simple language, so it is easily accessible to everyone. The statement is not required to follow a compulsory structure, but it is suggested that the following topics are included:

- **Key Performance Indicators (KPI's):** its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate.
- **Organisational structure:** the structure of the business, its supply chains, and its operations.
- **Laws & policies:** its policies in relation to slavery and human trafficking.
- **Due diligence:** its due diligence processes in relation to slavery and human trafficking in its business operations and supply chains.
- **Risks:** the parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk.
- **Training:** the training about slavery and human trafficking available to its staff and management.



*"With the Modern Slavery Act now fully in force; companies need to focus on its implications as a matter of urgency."*

Edward Naish | Manager, Assurance





## How can Omega Resource Group help?

We take compliance very seriously: our systems, experience and sector knowledge, accompanied by ISO and industry accreditations help mitigate risk whilst optimising efficiencies for our customers. Working closely with our clients, we can provide a range of services designed to help meet legal and operational requirements and working in partnership to help maintain the productivity of their workforce.



Omega Resource Group is opposed to slavery and human trafficking in any part of our business or supply chain. We are a global provider of recruitment, resource solutions in the Aerospace, Automotive, Built Environment, Construction, Manufacturing, Warehouse and Distribution sectors. We have zero tolerance to slavery and human trafficking.

Our candidates are correctly screened, maintained and monitored to avoid any possible breach of MSA regulation.



*Edward Naish is part of the Sustainability team in the UK Wales & West region, providing assurance and consultancy services relating to sustainability and sustainable development to clients in all sectors and industries, from SMEs and local government to FTSE-100 firms and national government.*

*edward.naish@pwc.com*

*+44 (0) 7701 297 547*

Additional guidance has been issued by the Home Office on how to comply with the MSA [here](#).

**Get in touch with  
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