



Home Office

Modern Slavery and Supply Chains Government Response

Summary of consultation responses and next steps

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Foreword by Home Secretary



Modern slavery is a despicable and inhuman crime in which women, men and children are subjected to unimaginable suffering by criminals.

That is why I am pleased we have introduced the world-leading Modern Slavery Act 2015. The transparency in supply chains provision in the Act is a truly ground-breaking measure. It recognises the important role business can play in tackling this scourge and encourages them to do more. By requiring businesses to disclose what they are doing to eliminate slavery in their supply chains, we will provide a strong incentive for businesses to take this issue seriously.

All businesses above a certain turnover threshold are obliged to comply with this provision. This document sets out the Government's response to the transparency in supply chains consultation, which sought the views of interested parties on what level of turnover that threshold should be set.

I know many businesses are already working with those in their supply chains to ensure they are free from slavery. I am confident that the transparency measure will encourage more businesses to do the same. The presence of modern slavery in supply chains should concern us all, from the businesses who sell goods and services in the UK, and the investors who financially support businesses, through to the consumers who buy the end products. That is why this measure is so important. It raises the bar and sends out a powerful signal to the world about the UK's determination to confront all forms of modern slavery.

Modern slavery is a complex and multi-faceted crime. Tackling it will require all of us to play a part – government, law enforcement agencies, businesses and non-governmental organisations. By working to stop criminals infiltrating supply chains we can try to prevent more people from becoming victims. And that will take us one step further in our determination to be at the forefront in fighting this evil, and putting an end to the misery endured by millions across the world.

1. Introduction

1.1 The previous Government launched a consultation on 11 February seeking views in relation to the transparency in supply chains provision in the Modern Slavery Act 2015. Section 54 of the Act includes a provision which requires commercial organisations above a certain turnover threshold to produce a slavery and human trafficking statement for each financial year setting out what they have done to ensure there is no modern slavery in their supply chains or own business (or that they have taken no such steps). The purpose of the consultation was to seek the views of interested parties on what **level the turnover threshold** should be set at and the **content of the statutory guidance**.

1.2 The consultation document can be seen here:
<https://www.gov.uk/government/consultations/modern-slavery-and-supply-chains>

2. About this consultation

2.1 The consultation document was published on the .GOV website at: <https://www.gov.uk/government/consultations/modern-slavery-and-supply-chains>. An invitation to respond was sent to a wide range of stakeholders including: businesses in a range of sectors; trade bodies; business representative groups; NGOs and other government departments for whom the Home Office held contact details. Two events were also held at the Home Office in March to which a wide range of partners were invited. The purpose of the events was to provide stakeholders with an opportunity to discuss the consultation in more detail.

2.2 A full list of respondents can be found in **Annex 1** at the end of this document.

3. Method

3.1 The consultation took place over a twelve week period from 12 February 2015 to 7 May 2015.

3.2 The consultation document was made available on the Home Office website. Respondents could also complete the consultation anonymously via email to supplychains@homeoffice.gsi.gov.uk or via post directly to the Home Office. Welsh, large print and audio versions of the consultation were available on request.

3.3 The consultation document was developed following engagement with a range of businesses and representative organisations. To support the consultation process, stakeholder events were held and subsequently smaller working groups were set up in order to canvass opinions from Parliamentarians, businesses, NGO’s and other key interested parties. Recurring and key themes from these discussions were considered and have been reflected (Where applicable) in the summary of responses.

4. Summary of responses

4.1 In total, we received 181 responses to the consultation (164 were submitted online or by email, five by post, and 12 letters of support). Responses were received from a range of businesses, trade bodies, representative organisations and NGOs.

4.2 A large number of respondents did not state the organisation or sector they were from. In addition, a large number of respondents did not answer all of the consultation questions. The numbers and percentages of responses therefore reflect the number of respondents who answered particular questions.

TABLE 1: Consultation respondents by sector

Sector	Number of Respondents
Retail	15
Hospitality	3
Food and Drink	2
Recruitment and Labour Providers	1
Other Private Sector	7
Frontline organisation	3
Other Public Sector	5
Trade Body	13
Trade Union	1
NGO	13
Other	30
Unspecified	68

4.3 The Government would like to thank all those who have given their time to respond and contribute to this important consultation.

5. The Modern Slavery Act provision

5.1 The provision in the Modern Slavery Act has been specifically designed to minimise the burdens on business whilst at the same time setting a common framework. The measure will encourage businesses to do the right thing, by harnessing consumer and wider stakeholder pressure.

5.2 It is possible for a business to comply with the provision in the Act by simply stating that they have taken no steps during the financial year to ensure that their business and supply chains are modern slavery free. However, this requirement will make it absolutely transparent what action a business is or is not taking and will allow investors, consumers and the general public to decide who they should and should not do business with.

5.3 A similar transparency provision was introduced in California in 2012. The California Transparency in Supply Chains Act 2012 sets a threshold of \$100m (around £60m) for businesses operating in California. It requires businesses that are organised or commercially domiciled in California or whose sales in California exceed the lesser of \$500,000 or 25% of their total sales to comply with the provision.

5.4 Our approach draws on the legislation in California but goes further in three important ways. The Modern Slavery Act provision covers:

- organisations carrying out any part of their business in the UK (there is no requirement for a business to meet a certain level of 'footprint' in the UK);
- all sectors, not just retail and manufacturing; and
- both goods and services (whereas California covers only supply chains for goods).

5.5 The consultation specifically asked respondents to give their views on two important issues:

- the level of the turnover threshold; and
- the content of statutory guidance.

6. Determining the Turnover Threshold

6.1 Determining the turnover threshold is extremely important as it will determine which organisations will need to comply with the provision.

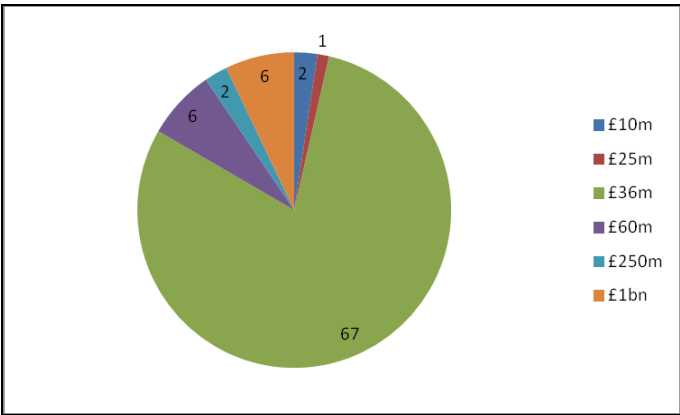
Question 1 in the consultation specifically asked respondents to indicate what level of turnover threshold they think would be the most appropriate for requiring a business to make a slavery and human trafficking statement.

6.2 In total, 84 respondents answered question 1 relating to the turnover threshold. The question asked respondents to indicate from a list of potential threshold levels which they supported. **Table 1** sets out the range of options offered to respondents (including two specific lower thresholds suggested by businesses themselves) and **diagram 1** sets out how respondents answered the question.

Table 2

	Threshold level
	£10m
	£25m
Option 1	£36m
Option 2	£60m
Option 3	£250m
Option 4	£1bn

Diagram 1



6.3 As **diagram 1** shows, of those 84 respondents who answered question 1, 67 (80%) thought that the threshold should be set at the lowest level proposed of £36m. Those who chose £36m felt that it should be set at this level to ensure that the measure applied to as many businesses in the supply chain as possible.

6.4 A common rationale for this choice was that many respondents felt that businesses with a turnover at this level are more likely to have the necessary purchasing power, resources and influence to create effective change within their supply chains. The figure of £36m is also a common definition used in the Companies Act 2006 to define large businesses for other reporting requirements.

6.5 Several respondents who opted for the £36m threshold commented that they would also like to see the lowering of the threshold over time to accord with the definition of a small to medium-sized business in accordance with the Companies Act 2006.

6.6 Many of the of respondents who opted for the £36m threshold suggested that, in order for this requirement to be effective there should be a way that small and medium sized businesses, non-governmental organisations, and other international companies who are not required to report within the legislation can opt in as early adopters of the requirements of the Act. Having these organisations opting in could help outline the specific alterations that might need to be made to the reporting framework that would best fit the operational structures and resources of smaller businesses prior to any future consideration of whether the threshold should be lowered.

6.7 Despite there being a very high level of support for a threshold set at £36m some respondents expressed support for a UK threshold being more closely aligned to the \$100 million threshold stipulated in the California Act. In total, 7.1% of respondents opted for an equivalent threshold of £60m.

6.8 4% of respondents to the question on the threshold felt that it should be set much lower than £36m. Of those 4%, 2% of respondents thought that the threshold should be set at £10m; the same number also opted for the threshold to be set at £25m.

6.9 Those respondents opting for the lower end of the threshold spectrum said that many of the businesses within this range would be product suppliers and manufacturers and that targeting this group could therefore further decrease the likelihood of slavery further down the supply chain.

6.10 Feedback from a number of respondents acknowledged the need to balance the benefits of transparency with the desire of the UK Government to avoid placing undue burdens on business. Respondents who chose the lower threshold believe that the success of implementing the Modern Slavery Act and, in particular, the legislation covering the Transparency in Supply Chains provision will be far greater if more businesses are actively involved.

6.11 Some respondents felt that a fairer approach would be to introduce a threshold aligned with the threshold in California. This would assist those global businesses who operate both in the UK and the US as they would already be under an obligation to carry out transparency-related activities. Finally, a small number of respondents expressed concerned

that if the threshold was set below £60 million there may be a risk of diluting the focus of the provision.

6.12 In contrast, 7% of those responding to question 1 on the threshold opted to set the threshold at £1bn. Some respondents said that the reason for choosing the highest suggested threshold was because companies with a turnover of this size are most likely to affect change throughout the whole supply chain. The respondents cited the influence of the large retailers as the reason for opting for this choice as well as their obligation to ensure supply chains are robust against slavery, in particular, within the agricultural sector. These respondents felt that larger global companies would have the most resource to assess and monitor global working conditions.

6.13 36% of respondents disagreed or strongly disagreed with **question 3** which sought views on introducing a higher threshold initially and then reducing it over time. Respondents felt that there would be very little or no benefit to taking this approach as the smaller businesses may pass this information on to the larger businesses anyway as part of the larger businesses reporting requirements. Almost half of the 36% of respondents who disagreed or strongly disagreed with reducing the threshold over time instead recommended that a more far-reaching approach should be taken from the outset, by applying the provision to all businesses regardless of their turnover.

6.14 56% of respondents to question 3 either strongly agreed or agreed with setting the threshold higher and reducing it over time.

6.15 Respondents also felt that in order to ensure that the slavery and human trafficking statements can be monitored effectively, it would be logical to initially set the threshold higher as this would result in a more manageable amount of statements being generated. Once an effective method of tracking and monitoring the statements was identified, the threshold could be lowered to include more businesses.

6.16 Of the respondents who opted for setting the threshold at a higher level many thought that the effectiveness of this approach would be higher if the Government or one of its partners were to launch a central database, the purpose of which would be to act as a comparison site to consumers as well as a league table of compliant companies. It would also streamline the reporting process as consumers and the general public would be able to see which businesses have published an annual statement for their reporting period. The database would also hold a link to the annual statement on their website, to reduce overheads of the central database and to ensure the most up-to-date version of the statement is available for viewers.

6.17 It was widely commented that an eventual reduction of the threshold over time to include large to middle size businesses would positively contribute to providing consumers with information regarding their efforts to tackle modern slavery, and to educating consumers on purchasing from businesses that manage their supply chains responsibly. In this way, consumers will be enabled to distinguish businesses on the basis of their efforts in ensuring the adequate governance of their supply chains.

7. Statutory Guidance

7.1 The consultation also asked a series of questions about what the statutory guidance for businesses should include. During the final stages of passage of the Modern Slavery Act, further information was included in section 54(5) of the Act, setting out the types of information that might be included in a statement. This inclusion was designed to provide businesses with a high level framework.

7.2 Based on the California Act, our prior engagement with NGOs and businesses, and impending changes to reporting requirements we have identified five general areas of activity that should ideally be included in a slavery and human trafficking statement. They are:

- a) A brief description of an organisation's business model and supply chain relationships;
- b) A business's policies relating to modern slavery, including due diligence and auditing processes implemented;
- c) Training available and provided to those in 1) supply chain management and 2) the rest of the organisation;
- d) The principal risks related to slavery and human trafficking including, how the organisation evaluates and manages those risks in their organisation and their supply chain; and
- e) Relevant key performance indicators (Key performance indicators are measures that will assist the reader of a slavery and human trafficking statement to assess the effectiveness of the activities described in the statement. As the statements will be produced annually, performance indicators are likely to be useful in demonstrating progress from one year to the next. The choice of which measures to use will depend on the individual circumstances of the business).

7.3 The guidance will set out the kinds of information that might be included in a disclosure, but it will only be guidance. Ultimately, we want businesses to take the issue of modern slavery seriously at the highest levels and for businesses to be able to determine, demonstrate and explain their policies and practices relevant and specific to their own circumstances. We fully expect slavery and human trafficking statements to differ from business to business.

7.4 This will allow businesses to better reflect the unique position of their business and sector. For example a business which provides

services, and is entirely based in the UK, may need to disclose much less information than a retailer with suppliers all over the world.

7.5 Clear and informative guidance will help to prevent this requirement from becoming a simple tick box exercise by directing businesses towards the kinds of important steps and actions they could take, without setting rigid minimum requirements.

7.6 **Questions 5 to 15** asked respondents to indicate their views on including information in the statutory guidance on the five areas specified in the Act. Overwhelmingly, respondents agreed or strongly agreed that guidance should include information about the five areas set out in the Act. **Table 3** provides a breakdown of those responses:

Table 3

Information	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
a) Organisations structure	67%	30%	2%	1%	0
b) Policies on modern slavery	48%	49%	4%	0	0
c) Training	53%	22%	16%	7%	2%
d) Risks and evaluation	46%	46%	5%	2%	1%
e) Key performance indicators	42%	33%	13%	4%	8%

7.7 Many respondents commented that businesses should be made to report in all areas specified in **question 5**. There is an expectation from respondents that there should be stronger legislation to enforce the production of statements from businesses otherwise rates of compliance might be reduced if businesses considered that any repercussions of non-compliance were weak.

7.8 In general, respondents were very supportive of the idea of businesses having to produce annual statements on modern slavery-related activity. 97% of respondents either strongly agreed or agreed with the inclusion of a description of an organisations structure, business and detail about their supply chains. This will be important as it will demonstrate the complexity of an organisation and its supply chain and will help to show to what level of detail the organisation has undertaken activity to address modern slavery.

7.9 A further 96% of respondents agreed that statements should also include a description of the organisations' policies on modern slavery. In practice, this may be as simple as a link to policies which are already published.

7.10 75% of respondents thought that training should be provided or be made available to those in the organisation, particularly those in supply chain management. Respondents suggested that training could be delivered by a third party, such as an auditor or ethical compliance scheme rather than the organisation itself. Guidance could be offered to businesses on training routes should they wish to offer this to suppliers but this should not be a compulsory part of the regulation.

7.11 Some respondents stated that if no problems are found by a business in their supply chains then 'mandatory' training would be an unnecessary expense. It might be better to include guidance on the type of training that should take place if violations are found in the supply chain in order to target advice where it is needed, rather than building in an upfront cost for all.

7.12 In relation to the evaluation and management of risks, 93% of respondents either agreed or strongly agreed that these should be included in any statement. Including information relating to risks will show the approach a business has taken to identifying potential risks and any action to mitigate or manage them effectively.

7.13 75% of respondents strongly agreed or agreed with the inclusion of relevant key performance indicators, with 13% either strongly disagreeing or disagreeing with this option. Of the 13% of respondents who either disagreed or strongly disagreed, many felt that key performance indicators should be set by the Government within the guidance, rather than by businesses themselves. These key performance indicators would provide a level playing field for all businesses.

7.14 When asked if there were other areas of activity that should be covered in the guidance, 72% of respondents said yes, 27% said no and 1% said they didn't know.

7.15 Respondents commented that they expected the proposed actions that businesses will take as a result of the new requirement to make a genuine difference to working conditions in supply chains. Many felt that the legislation should specify a set of minimum criteria for disclosure as well as areas for reporting.

7.16 Respondents felt that businesses should include a full assessment of their supply chains in order for the actions to be judged as complying

with the requirements of the Act. The identification of key risks is thought to be an important measure which demonstrates that a business has considered the scope of their operations and where the greatest risks of slavery lie.

7.17 Some respondents felt that the guidance should include a clear steer on the types of risks that businesses should consider when producing their statements. There was a clear emphasis on this as respondents felt that a generic definition of risk could be open to interpretation and therefore have a negative impact on the quality of statements.

7.18 Respondents to **the question asking about the types of activities expected to be included within the statement** also wanted some guidance on how any activities should be undertaken. This would provide businesses with a clear set of instructions that could be uniformly applied. Respondents also believe that lessons could be learned from the implementation of similar ethical compliance measures and schemes in other countries.

7.19 72% of respondents thought that the statements should cover other areas of activity. Many suggested, for example, that recruitment agencies could have a potential role to play in managing the risks of modern slavery.

7.20 Respondents also suggested that it would be helpful to set out information on the expectations around how frequently information was reported to, and discussed, at board level, with an overview of the due diligence process in relation to modern slavery in a company's business and supply chains. This will allow a business to clearly demonstrate the positive impact of their work both on their own company practice and across the wider supply chain.

7.21 Although respondents highlighted these additional areas for inclusion they also recognised the importance of not placing unnecessary burdens on business in terms of reporting.

7.22 Many felt that the statement should be published together with the organisation's existing public reporting i.e. alongside the Annual Report and CSR/Sustainability reports, or alongside any voluntary non-financial reporting, as appropriate. The guidance could also signpost businesses to any central repository to upload their statement in order to improve transparency further.

7.23 Responses on the content of statutory guidance were all very positive with many respondents sharing a range of similar ideas on best

practice. **Table 4** summarises the responses to the additional information respondents would like to see in the statutory guidance.

Table 4

Information	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
Advice on publishing a statement	65%	34%	1%	0	0
When to publish a statement	53%	47%	0	0	0
Signing of the statement	57%	47%	0	0	2%
Advice on identifying slavery	59%	40%	1	0	0

8. Government Response to the Consultation

8.1 Our approach to transparency in supply chains has always been premised on the desire to improve transparency whilst at the same time ensuring that businesses take appropriate and proportionate action to tackle modern slavery.

8.2 The Government welcomes the range of views put forward by respondents to this consultation. The consultation asked respondents questions about two important areas: the level of turnover threshold which will define those businesses that will be required to comply with the provision and the content of statutory guidance.

8.3 We have listened carefully to businesses, both through this consultation and through regular engagement in developing the transparency measure. We recognise, in particular, the importance of getting the level of the turnover threshold right, to influence supply chain accountability in the right way. After careful consideration of the consultation responses we have decided to set the turnover threshold at **£36m** per year. This means that all commercial organisations carrying on business in the UK with a total turnover of **£36m** or more will be required to complete a slavery and trafficking statement for each financial year of the organisation.

8.4 We believe that £36m is the right turnover threshold for a number of reasons. £36m is one of thresholds set out in the Companies Act 2006 for determining the size of a large company. This will simplify the non-financial reporting requirements for large businesses over £36m who are already obliged to report on non-financial matters.

8.5 Secondly, we want to ensure that there is a level playing field. All businesses should be aware of the potential for modern slavery to infiltrate their supply chains and businesses. We think it would be unreasonable to expect only a few businesses with significant turnover to be subject to the requirement to publish a statement.

8.6 Setting the threshold at £36m will also ensure that small and medium-sized businesses, that do not have the same resources as larger businesses are not caught by the requirements of the transparency provision.

8.7 A significant number of respondents (80%) who answered the turnover question want to see it set at £36m. We do recognise that a number of respondents wanted the threshold to be significantly higher (10% opted for either £250m or £1bn). Respondents who suggested a much higher threshold felt that businesses of this size had even greater

influence to affect change throughout their supply chain and amongst their peers. As well as this respondents said that larger companies within certain sectors already have an obligation to ensure their supply chains are slavery free (agriculture and food processing sectors). The respondents who chose the higher thresholds also argued that larger businesses would have the most resource and expertise to be able to assess and monitor working conditions more thoroughly than smaller businesses. Whilst we appreciate this, we do not believe that such an issue should be left to a handful of businesses to tackle alone. Modern slavery is an international issue affecting every one of us and it needs a coordinated and comprehensive response.

8.8 In considering the legislation we have taken a simple approach to the definition of turnover for the purpose of this provision. There are a number of ways of defining business size. For example, the Companies Act 2006 refers to employee numbers as well as turnover. We considered the different options carefully when drawing up our transparency provision. Feedback from business had been clear that this policy should aim to create fair competition, and help to level the playing field by requiring all businesses of a similar size to declare what they are doing. If we defined business size by employee number, it was clear that there would be some businesses with very large turnovers but very few employees, who might then be excluded, despite clearly having similar resources and purchasing power as other companies who were being required to comply. This approach is seen as a general reflection of the position in the California Act, which simply defines business size by worldwide annual gross receipts.

8.9 We agreed with the rationale given by 90% of respondents for setting the threshold lower than the £250m mark as it would lead to more businesses applying the correct level of due diligence in order to reduce and eliminate slavery from their supply chains. By including a larger number of businesses we will ensure real change is made in this area.

8.10 We intend to commence the legislation in October 2015, subject to appropriate parliamentary clearance. This will require all businesses that have a turnover exceeding £36m to report on what steps they have taken to eliminate modern slavery from their supply chains and own business. To give businesses sufficient time to prepare, transitional provisions will be developed so that statements are not required where a businesses' financial year end is within close proximity to the date that the duty comes into force.

8.11 The consultation also asked respondents to indicate what areas they would like the statutory guidance to include. The consultation specifically asked about the five key areas set out in the Modern Slavery Act 2015, namely:

- a) A brief description of an organisation's business model and supply chain relationships;
- b) Policies relating to modern slavery, including due diligence and auditing processes implemented;
- c) Training available and provided to those in 1) supply chain management and 2) the rest of the organisation;
- d) The principal risks related to slavery and human trafficking including, how the organisation evaluates and manages those risks in their organisation and their supply chain; and
- e) Relevant key performance indicators (Key performance indicators are measures that will assist the reader of a slavery and human trafficking statement to assess the effectiveness of the activities described in the statement.

8.12 There was clear support for the options on the questions relating to what the guidance should include with almost all respondents either strongly agreeing or agreeing that the five areas above should be included in guidance. Respondents felt that businesses should also have a clear steer on when a statement should be published, advice on where it should be published and ideas as to how modern slavery could be identified. We will, therefore ensure that each of these aspects will be included in the guidance.

8.13 Some respondents commented on the processes involved in producing the annual statements. Many suggested that the risks involved should not be viewed in the more traditional way - i.e. focussing on the risk to business - but instead looks at the risk of slavery being present due to the action or inaction of businesses. A few suggested that as part of producing their statements, businesses should seek the views of a sample of staff working in their supply chain. Respondents also said that businesses should also work with trade unions, NGO's and civil society to create inclusive due diligence processes and relevant and safe reporting mechanisms. To that end we will ensure that the guidance contains good practice for businesses to consider in relation to due diligence processes. However, we will not dictate the type of activities businesses should undertake or how they should carry them out. It is for individual businesses to determine what activities they think are reasonable and proportionate.

8.14 There was strong support for the inclusion of training to businesses as part of the guidance with 75% either strongly agreeing or agreeing to

include information about training in the guidance. Many thought that training should be delivered as a priority to all staff with direct responsibility for those who either have direct supply chain management or those who work within procurement teams. Some commented further and suggested that businesses operating within the banking and financial sectors should have training tailored specifically to monitor irregularities such as money laundering as well as filters specific to this sector being developed. To support businesses we will identify and signpost any appropriate training opportunities they may undertake to improve training and awareness of their employees and their supply chains.

8.15 Other respondents commented on the guidance being clear on how the statements would be monitored and regulated. Some respondents thought that the responsibility of monitoring and reporting back on the quality and compliance of producing statement should be placed with the Independent Anti-Slavery Commissioner or an identified team or person within Government.

8.16 Many respondents suggested that a central platform to house all of the statements should be developed. Some have suggested that a website should be developed to host and monitor the list of companies required to publish a modern slavery statement. It has been suggested that the website should be the primary source of information needed to allow the Government to monitor levels of compliance.

8.17 In turn, the website would allow the public, businesses, consumer groups and potential investors to compare corporate responses to the challenge of addressing modern slavery. Suggestions on the possible functionality of the website included: feedback and comments sections as well as the ability to search for specific businesses.

8.18 Some have suggested that the guidance should contain an agreed and clear definition of modern slavery and how it can be identified. As well as providing examples of what constitutes slavery in a modern context and should include what considerations businesses should give to cultural or the local practises when sourcing supplies from overseas countries. Many respondents have called for the inclusion of examples of a best practise statement.

8.19 In developing the detail of the statutory guidance we will work with stakeholders to ensure that the comments and suggestions raised as part of this consultation are appropriately reflected in the guidance produced. We will continue to work with our stakeholders to ensure that the guidance is clear and, where possible, tailored to meet the differing needs of the many different sectors that businesses operate in. The guidance will be produced and published to coincide with the duty coming into force.

List of consultation questions

Q1. What level of turnover threshold do you think would be the most appropriate threshold for requiring a business to make a slavery and human trafficking statement?

Q2. Please explain your answer.

Q3. To what extent do you agree that there should be a higher turnover threshold set initially to focus on larger businesses and then reduce the threshold to cover more businesses, over time?

Q4. Please explain your answer.

Q5. For each of the following headings to what extent do you agree that the activities we think should be included in a statement are the right ones?

5i) Information about an organisation's structure, business and supply chains

5ii) Information about an organisation's policies on modern slavery

5iii) Information about an organisation's due diligence processes in relation to modern slavery in its business and supply chains

5iv) Information about the parts of an organisation's business and its supply chains where there is a risk of modern slavery taking place, and the steps it has taken to assess and manage that risk

5v) Information about an organisation's effectiveness in ensuring that modern slavery is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate

5vi) Information about the training on modern slavery available to its staff

Q6. For each of the headings above please explain your responses, and set out (a) what information you think companies should disclose about their activities in these areas and (b) what you think would represent good practice in each of these areas?

Q7. Are there any other areas of activity that you think a slavery and human trafficking statement should cover?

Q8. What would good practice look like in the areas you have suggested?

Q9. Are there any specific areas of activity that you think businesses in certain sectors should disclose?

Q10. What would good practice look like in the areas you have suggested?

Q11. To what extent do you agree or disagree that any guidance the Government publishes should include the following aspects in relation to making a slavery and human trafficking statement?

- Advice on publishing a statement online
- Advice about when to publish a statement
- Advice about the signing of a statement
- Advice on what to do if you suspect or identify slavery in your supply chain

Q12. What would good practice look like in relation to publishing a statement online?

Q13. What would good practice look like in relation to the timing of publishing a statement?

Q14. What would good practice look like in relation to the signing of slavery and trafficking statement by the business or organisation?

Q15. Do you have any further comments on what the statutory guidance should include?

Q16. Are you responding in an individual capacity or on behalf of a particular organisation?

Q17. If you are responding on behalf of an organisation, which of the following best describes your organisation (if more than one describes your organisation, please choose one which you feel represents the main focus of your work).

Key Respondents to the Consultation

We received 181 responses to the consultation from a range of businesses, trade bodies, NGOs and other. Respondents included:

- Food and Drink Federation
- British Retail Consortium
- Tesco
- Marks and Spencer
- Ethical Trading Initiative
- Asda
- Gangmasters Licensing Authority
- Confederation of British Industry
- Joseph Rowntree Foundation
- Debenhams
- Nestle
- Fair-trade Foundation
- John Lewis
- Primark
- Amnesty International
- Unicef
- Trade Union Congress
- British Medical Association
- Unseen
- Thomas Cook Group