

Modern Slavery Statement

General information

Only employers who meet the following criteria must produce a modern slavery statement for each financial year: with an annual turnover of £36 million or more; who are a body corporate or a partnership; carry on a business or part of a business in the UK; and supply goods or services

'Turnover' is to be calculated as including the turnover of any of an organisation's subsidiaries, regardless of where those subsidiaries are based or carry on their business.

Whilst not caught by the legal requirement, the government encourages organisations underneath the £36 million threshold to voluntarily produce a statement.

A parent organisation which meets all of the criteria above will have to include the steps taken in relation to its subsidiaries in its statement if, depending on the particular facts, the activities of the subsidiary in fact form part of the supply chain or business of the parent. This will be the case even if the subsidiary in question does not meet all the criteria above (for example, if its turnover is below £36m). If the subsidiary meets all of the criteria in its own right, then it is required to produce a statement in its own right.

Statements must be provided for steps taken in a financial year, therefore it follows that statement should be created and subsequently reviewed nearing the end of that financial year. What dictates when an organisation needs to have a statement is their financial year. If their financial year ends on 31st March (which most organisations do), companies are encouraged to report as soon as possible but within 6 months of their organisation's financial year end.

The report must be reviewed and updated every year. This applies as below:

Financial Year End

31 March 2016: Statement to be published for 2015/2016 financial year by end September 2016

1 April 2016 onwards: Must publish for previous financial year within 6 months of financial year end

30 September 2017: Statement for 2015/2016 financial year to be reviewed and updated with information relating to 2016/2017 financial year

1 October 2017 onwards: Statement for previous financial year to be reviewed and updated with information relating to 2016/2017 financial year

The headers included in the template statement represent the areas of information that are required in a modern slavery statement. The content should be used as the basis of the statement to be used by your organisation.

In order for the statement to be complete, you must amend it where necessary and fill in the pieces of information where directed. The information required will be unique to your organisation; your processes and your structure and therefore must be completed by you. You are not tasked with making sure that no modern slavery takes place in your supply chains; just making sure there are steps to take if it is found to happen.

You must include the steps that you have taken in order to ensure there is no modern slavery in your organisation or your supply chains. Therefore, this is more than a paper exercise; you must take action and then confirm in this statement what action you have taken. You are prompted where action is necessary. Steps should show improvement year on year to demonstrate practical progress.

The statement must contain the date it was approved, usually by the Board of Directors. It must also be signed by the most senior person in the organisation e.g. the Director, or one person from the most

senior level in the organisation e.g. one of the Board of Directors. This senior person should have been involved in the approval process, where possible.

The statement should be available on your website, and accessible via a prominent link on your homepage. Previous statements should be kept on the website even where a newer one has been published.