

## Client Alert: Brexit and Modern Slavery Compliance

**Date :** July 26, 2018

### What is UK modern slavery compliance all about?

Under the UK Modern Slavery Act 2015 compliance disclosure requirements an organization with UK £36 million turnover that sells goods or services in the UK is required to annually publish a slavery statement demonstrating what they are doing to ensure that there is no slavery or human trafficking in the business or the supply-chain. This also applies to organisations based outside the UK selling goods and services into the UK. This compliance obligation has been in force since 29 October 2015 and many organisations who fall under it have already published their first statement.

Those organisations whose financial end-of-year was December 2017 and who meet the criteria to publish a slavery statement will be required to publish a statement to cover the period of January-December 2017. They should have this by the end of June 2018. If this is the second statement it will have to show progress since the first one.

The UK is also currently in the process of amending the Modern Slavery Act 2015 with a view to giving modern slavery compliance enforcement more teeth. We have written about here: <http://www.corderycompliance.com/update-on-proposal-to-amend-modern-slavery-act-2015/>.

### Will Brexit have an impact?

The Modern Slavery Act 2015 is entirely UK based and driven, i.e. it is unrelated to EU legislation or any other EU requirements. Therefore Brexit is not expected to have any impact on compliance with the requirements of the legislation. The only impact Brexit may have is an indirect one on progress to amend the Modern Slavery Act 2015 as 12 July 2017 was the last time the matter was given official Parliament time – the Brexit process is taking up a lot of the UK Parliament's time.

### Resources

Training is a vital part of any compliance, which is equally true of modern slavery compliance. Crucially, employees and suppliers need to know how to spot the signs that modern slavery may be taking place, which we have made a short film about this which can be found here: <http://www.corderycompliance.com/spotting-the-signs-of-modern-slavery/>.

For our articles on modern slavery please see here: <http://www.corderycompliance.com/category/modern-slavery/>. We've also written on other Brexit topics here - <http://www.corderycompliance.com/category/brexit/>. Cordery's Brexit task force includes lawyers experienced in dealing with UK & EU authorities on a wide range of compliance issues.

For our glossary on Brexit please see here: <http://www.corderycompliance.com/brexit-glossary/>.

The implications of Brexit are rapidly evolving. This note is based on a number of assumptions which may change. There is no substitute for legal advice on your particular circumstances.

See also our short film [here](#) on Brexit and Compliance where André Bywater & Jonathan Armstrong discuss how compliance might change post-Brexit. They look at a number of distinct areas of compliance including modern slavery, sanctions and data protection and walk through what businesses might want to do now to make sure they comply.

For more information please contact André Bywater or Jonathan Armstrong who are lawyers with Cordery in London where their focus is on compliance issues.

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