



10 STEPS ORGANISATIONS SHOULD TAKE TO START PREPARING TO COMPLY WITH THE UK MODERN SLAVERY ACT (MSA)

By Colleen Theron

1. Consider whether the organisation is defined as a 'commercial organisation' within the definition of the Act
2. Consider whether a response to the MSA will fit within existing strategic objectives or the organisation –such as adopting an approach to the UN Guiding Principles on Business and Human rights
3. Understand the countries in which the organisation operates -some countries pose a higher risk in relation to incidents slavery than others and understand the organisation's operations
4. Work with relevant personnel to map the organisation's operations and supply chain
5. Develop or update existing policies to address human rights issues, including slavery, forced and bonded labour and human trafficking¹
6. Develop or update any existing checklists and purchasing policies
7. Develop or update supplier codes of conduct, tender requirements or any RFPs, and supplier contracts to account for the issue of slavery and human trafficking, including, for example, requirements on minimum labour standards in their supply chain,
8. Develop or update due diligence procedures to incorporate the risk of slavery and human trafficking
9. Ensure that all employees are made aware of the policy
10. Make training on slavery and human trafficking available to staff²

1. <http://clt-envirolaw.com/business-human-rights/>

2. Practical e-learning on business and human rights: <http://clt-envirolaw.com/business-and-human-rights-e-learning-series-introduction-to-business-and-human-rights/>

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Company registration number: 06678818 | VAT Registration number: 995458062
Registered office: 56 Mistys Field, Walton on Thames, Surrey, KT12 2BG

www.clt-envirolaw.com