

Debate: Tenth anniversary of the Modern Slavery Act, 27 March 2025

Slavery in Business Supply Chains

The Modern Slavery Act 2015 was a significant step forward in the fight against modern slavery. However, ten years since the Act was passed there remains much to do to prevent modern slavery, protect victims and pursue offenders. At the time the Modern Slavery Act was world-leading in respect of businesses' responsibilities for reporting their response to modern slavery. However, it has not had as much impact as had been hoped and other jurisdictions have since introduced more comprehensive regulatory frameworks. The UK risks being left behind and becoming a dumping ground for goods produced through forced labour.

1. Modern slavery is still a significant risk in UK business supply chains

- The 2023 Global Slavery Index estimated that the UK annually imports US\$26.1 billion products at risk of being made using forced labour. Of these, the five most valuable are: garments (estimated US\$10.1bn), electronics (estimated US\$14.7 bn), fish, textiles, and timber.¹
- Other reports reveal forced labour in global suppliers to the UK of seafood, textiles, fruit and vegetables, and processed tomato products, among others.² UK public procurement is also at high risk: 21% of NHS suppliers were identified as at 'high risk' of modern slavery in December 2023.³
- There is much greater awareness of state-imposed forced labour (not least in the Uyghur region of China described as the world's largest such system) and the particular challenges for businesses in conducting due diligence in this context.⁴ Leading brands across the automotive, fashion, retail and information technology sector⁵ and solar technology have been identified as high risk.⁶

2. Limitations of the Modern Slavery Act section 54

- The UK was seen as a global leader when it introduced section 54 of the MSA requiring companies with a turnover of more than £36 million to produce an annual statement on activities to address modern slavery in their supply chains.
- When section 54 was introduced, Ministers set out a clear desire to prevent goods produced with forced labour being sold in the UK.⁷ However, section 54 only requires businesses to **report** action on forced labour in supply chains not to **take** action. Reporting no action complies with the Act.
- Awareness and action on forced labour in supply chains have increased among UK businesses. However, the need for significant improvement in business conduct remains.

¹ [Global Slavery Index 2023, Walk Free](#)

² [Michaela Herrmann *The Outlaw Ocean Project Exposes China's Use Of Forced Uyghur Labour To Supply UK Seafood Industry* De Smog 15 November 2023](#); [SOMO and Arisa, *Spinning around workers' rights International companies linked to forced labour in Tamil Nadu spinning mills*, May 2021](#); [Ethical Consumer, *Produce of exploitation: UK supermarkets and migrant labour in southern Spain, are supermarkets failing to meet their ETI commitments in their fruit and vegetable supply chains?* March 2023](#); [Mike Rudin and Sarah Buckley *'Italian' purees in UK supermarkets likely to contain Chinese forced-labour tomatoes* BBC News 1 December 2024](#)

³ [Department for Health and Social Care and NHS England, *Review of risk of modern slavery and human trafficking in the NHS supply chain*, December 2023](#)

⁴ [Adrian Zenz, *Forced Labor in the Xinjiang Uyghur Autonomous Region: Assessing the Continuation of Coercive Labor Transfers in 2023 and Early 2024* China Brief Volume: 24 Issue: 5 February 2024 Jamestown Foundation](#); [Igor Patrick, *USA: DOL official says conducting due diligence on forced labour in Xinjiang "impossible", only way to comply with UFLPA is not to operate there*, South China Morning Post, 1 May 2024](#)

⁵ [House of Commons BEIS Committee, *Uyghur forced labour in Xinjiang and UK value chains*, March 2021](#); [Australian Strategic Policy Institute, *Uyghurs for Sale*, March 2020](#);

⁶ [Alan Crawford, Laura T. Murphy et al, *Over-Exposed: Uyghur Region Exposure Assessment for Solar Industry Sourcing*, Sheffield Hallam University Helena Kennedy School for International Justice, July 2023 Updated November 2023](#)

⁷ [Hansard Tuesday 4 November 2014, column 685](#)

- Many companies have reported little meaningful proactive action or long-term plans to address modern slavery.⁸ There have also been high rates of non-compliance (40% in 2021) and no enforcement action through injunctions or administrative penalties.⁹

3. Other global approaches: Mandatory human right due diligence and import controls

- Transparency alone is insufficient to change corporate behaviour. Since 2015, a number of jurisdictions including partners in the EU and G7 have introduced measures going beyond the Act.
- Mandatory human rights due diligence (mHRDD) laws have been passed in a number of countries and the EU.¹⁰ Researchers have concluded that although evidence is limited mHRDD holds “*greater promise of catalysing comprehensive and effective change in corporate practices*”¹¹ and “*especially of those falling behind in the voluntary adoption of human rights due diligence.*”¹²
- The USA has led the way with import controls and the EU also adopted them in 2024.¹³ Import controls prevent goods produced abroad through forced labour being traded into a domestic market.¹⁴ They can support responsible businesses undercut by unscrupulous competitors and provide leverage in negotiations with suppliers on labour rights.

4. Recommendations

- Previous governments indicated an intention to strengthen section 54 including adding mandatory reporting requirements and specific penalties for non-compliance, but no changes have yet been made.¹⁵ We welcome the forthcoming updated guidance accompanying section 54.¹⁶ However, guidance alone is inadequate to ensure compliance and as set out above transparency rules alone have proven insufficient to change corporate activity.
- We welcome the Government's commitment to “*assess the best ways to prevent environmental harms, modern slavery and human and labour rights abuses in both private and public sector supply chains, including effective due diligence rules*” and “*monitor the effectiveness of the UK's existing measures, alongside the impacts of new policy tools that are emerging*”.¹⁷
- **We recommend the Government move swiftly with new legislation so the UK is not left behind and to ensure a level playing-field for businesses. This should include (a) urgently strengthening section 54 including mandatory reporting requirements and meaningful penalties for non-compliance, (b) establishing a framework for the transparent imposition of import controls¹⁸ and (c) introducing mandatory human rights due diligence legislation.**

For briefings on other aspects of modern slavery or more information contact:

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⁸ [Lancaster University, Financial Reporting Council, Independent Anti-Slavery Commissioner, Modern Slavery Reporting Practices in the UK Evidence from Modern Slavery Statements and Annual Reports April 2022](#); [Ergon Associates, Reporting on Modern Slavery: The current state of disclosure, 2016](#); [Independent Review of the Modern Slavery Act 2015: Final Report May 2019](#); [CCLA Modern Slavery UK Benchmark 2024](#)

⁹ [Independent Review of the Modern Slavery Act 2015: Final Report May 2019](#); [Businesses and Human Resource Centre, Modern Slavery Act: Five Years of Reporting, 2021](#)

¹⁰ [French Corporate Duty of Vigilance Law 2017](#); [German Supply Chain Due Diligence Act 2021](#); [Council of the EU Corporate sustainability due diligence: Council gives its final approval](#), Press release, 24 May 2024

¹¹ [Justice and Care, Modern Slavery in Global Supply Chains: The state of evidence for key government and private approaches, July 2022](#)

¹² [Sofia Gonzalez De Aguinaga, Policy Brief Update: Effectiveness of mandatory human rights and environmental due diligence legislation in addressing modern slavery in business value chains, Modern Slavery and Human Rights Policy and Evidence Centre, March 2024](#)

¹³ [Tariff Act 1930](#); [Uyghur Forced Labor Prevention Act](#); [Forced Labour Regulation 2024](#)

¹⁴ [Centre for Social Justice and Justice and Care, Slavery at Home, February 2023](#)

¹⁵ [Home Office, Transparency in supply chains consultation Government response, September 2020](#); [Department for Business, Energy and Industrial Strategy, Establishing a new single enforcement body for employment rights Government response, June 2021](#); [HM Government, Queen's Speech 2022: background briefing notes, May 2022](#)

¹⁶ [Written Question HL2046 tabled on 28 October 2024](#)

¹⁷ [Home Office, Government response to House of Lords Modern Slavery Act 2015 Committee, Report of Session 2024-25 The Modern Slavery Act 2015: Becoming World-Leading Again, CP 1216, December 2024](#)

¹⁸ Further details of what this framework should look like are in [Centre for Social Justice and Care Slavery at Home - a new bill to tackle slavery in Britain, February 2023](#)