



# IT'S A PENALTY

## CONSULTANCY AND TRAINING

*Modern Slavery Briefing*

### **Modern Slavery Reporting: Preparing for What's Next**

Understanding the proposed reforms and what they could  
mean for organisations

01

# Understanding the Changes

**Modern slavery reporting could be about to become significantly more demanding.**

The **Immigration and Asylum Bill**, currently before Parliament, proposes significant changes to the UK's modern slavery reporting framework, including more prescriptive reporting requirements, stronger accountability and potential financial penalties for non-compliance.

**NOW:** Businesses in scope are required to publish an annual modern slavery statement setting out the steps they have taken to prevent modern slavery in their operations and supply chains. The current framework gives businesses considerable flexibility over the content of their statements.

**PROPOSED:** The Bill would introduce mandatory reporting requirements, stronger approval and accuracy requirements, government submission requirements and potential financial penalties for non-compliance. It would also introduce reporting requirements for qualifying public authorities.

**THE PRACTICAL SHIFT:** From publishing a statement → to demonstrating what your organisation is actually doing. The direction of travel is clear: organisations will increasingly need to show how they identify and address modern slavery risks in practice.

**What could change?**

| Current framework                                              | Proposed direction                                         |
|----------------------------------------------------------------|------------------------------------------------------------|
| Businesses in scope publish an annual modern slavery statement | More mandatory reporting requirements                      |
| Considerable flexibility over the content of statements        | Greater requirements to report specified areas of activity |
| Existing approval requirements                                 | Stronger approval and accuracy requirements                |
| Publication on an organisation’s website                       | Website publication plus submission to Government          |
| Limited enforcement mechanisms                                 | Potential financial penalties for non-compliance           |
| Primarily commercial organisations                             | Qualifying public authorities also brought into scope      |

**Who is currently in scope?** Under the current Section 54 requirements, commercial organisations are required to publish an annual modern slavery statement where they are a body corporate or partnership, carry on a business in the UK, supply goods or services, and have an annual turnover of £36 million or more. Under the Bill as currently drafted, the £36 million threshold would remain the starting point for commercial organisations, while qualifying public authorities would also be brought into the reporting framework.

**Why does this matter?** The proposed reforms would make modern slavery reporting more structured, more accountable and potentially more enforceable. For organisations, this means there is value in preparing now — rather than waiting for the new requirements to come into force.

## 02

### A Stronger Statement Starts with Stronger Practice

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**The statement is only as strong as the work behind it.**

Effective reporting depends on what happens throughout the year: understanding where exploitation risks exist, having appropriate due diligence and escalation processes, and knowing whether interventions are making a difference.

Can your organisation answer these questions?

1. Do we understand where people may be vulnerable to exploitation across our operations and supply chains?
2. Are the people most likely to encounter those risks equipped to recognise and respond to the indicators?
3. Do employees know what to do when they have a concern?
4. Are procurement and supplier-management teams equipped to ask the right questions?
5. Can we evidence the actions and commitments described in our modern slavery statement?
6. Do we know whether our approach is actually working?

**A modern slavery statement should be the result of work carried out throughout the year, not an annual exercise in reporting what is already on paper.**

## 03

## Making Training Count

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**Is your modern slavery training fit for purpose?** The proposed reforms would require organisations to report on training made available to their own staff and, so far as reasonably available, staff within their supply chain. This makes training an increasingly important part of an organisation's approach to prevention and reporting, but the quality of that training matters.

**Training should go beyond simply defining modern slavery.** In a large and diverse workforce, people have different roles, responsibilities and levels of exposure to risk. They cannot be expected to recognise exploitation or know how to respond without the right training and support. Effective training should equip people to recognise vulnerability and exploitation within the situations they actually encounter, and give them the confidence to respond appropriately.

**Training can also strengthen your evidence base.** Effective training can deliver more than greater awareness; it can also provide a ready-made source of evidence for your annual modern slavery statement. Training analytics can evidence participation and engagement, while also providing insight that can help identify priorities and improvement steps for the year ahead. This creates a simple cycle of training, learning and improvement that can strengthen both prevention and the evidence behind your next statement.

**This means one investment can both strengthen prevention and provide useful evidence of activity and progress throughout the year.**

**Practical experience matters.** It's a Penalty has more than 12 years' experience working with businesses, governments, law enforcement and NGOs to raise awareness of human trafficking and exploitation and support effective prevention.

Our training draws on real-world experience of the environments in which exploitation can occur, helping organisations move beyond awareness to practical action.

**It's a Penalty can tailor training for:**

- Boards and senior leadership
- Procurement and supply-chain teams
- HR and recruitment
- Frontline employees
- Travel, tourism and hospitality
- Transport
- Major sporting events and other high-risk environments
- Suppliers and business partners

## 04

### Five Steps to Prepare Now

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Preparing now gives organisations time to identify priorities, strengthen practice and build the evidence they will need for future reporting.

1. **Review your current statement.** Understand what you currently report and where there may be gaps against emerging expectations.
2. **Map modern slavery risk.** Consider your operations, labour models, procurement and supply chains rather than relying solely on policies or supplier declarations.
3. **Review training.** Identify which teams need general awareness and which require role-specific training based on their responsibilities and exposure to risk.
4. **Test your response.** Would someone who identified a potential concern know what to do next? Are reporting and escalation routes clear?
5. **Build your evidence base.** Start capturing training, due diligence, risk assessments, supplier engagement, interventions and measures of effectiveness throughout the year.

**Don't wait until your next modern slavery statement is due to find out where the gaps are.**

## 05

### How It's a Penalty can Help

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It's a Penalty works with organisations to develop practical approaches that help prevent abuse, exploitation and human trafficking.

Drawing on more than 12 years of experience working across businesses, governments, law enforcement and NGOs, our support combines anti-trafficking expertise, real-world experience and trauma-informed practice.

- **Modern Slavery Readiness Review.** A focused review of current training, awareness, due diligence and prevention activity against emerging reporting expectations, helping identify priorities for action.
- **Training & Capacity Building.** Tailored training for boards, employees, procurement teams, frontline staff and suppliers, designed around organisational roles, risks and operating environments.
- **Strategic Advisory Support.** Expert support across risk, prevention, due diligence, reporting and effectiveness.

**Want to understand what the proposed changes could mean for your organisation?** Talk to It's a Penalty about a Modern Slavery Readiness Briefing.

**Find out more about our Consultancy & Training:**

- [Visit our webpage](#)
- [Explore our Modern Slavery Consultancy & Training Information Pack](#)
- [Interested in discussing your organisation's needs? Complete our enquiry form](#)