WEBINAR

Modern Slavery Compliance: what public sector buyers now expect

Your statement, your supply chain, and how to evidence both — for suppliers to councils, the NHS, central government, housing and education.

ebida · Supplier Development Programme

One question to start

Answer it honestly. Most suppliers cannot.

How do you monitor your supply chain — and how is that reflected in your Modern Slavery Statement?

A Modern Slavery Statement is meant to be more than a bunch of nice words.

Buyers have stopped asking "do you have a statement?" and started asking "show me how you know."

Why this matters now

From a statement on a website to something your buyer has to check.

28 million

people in forced labour worldwide, much of it inside everyday supply chains

£36m

turnover at which the Modern Slavery Act requires an annual statement

17 May 2026

the NHS modern slavery regulations came into force

Any value

no minimum contract value and no small-supplier exemption under the NHS rules

Every part of the public sector is now asking suppliers the same thing: have you looked, and can you show it?

Sources: International Labour Organization, 2022; Modern Slavery Act 2015, section 54; NHS (Procurement, Slavery and Human Trafficking) Regulations 2025.

The rules, across the public sector

Whichever part you sell to, at least one of these reaches you.

LARGER BUSINESSES

Modern Slavery Act 2015, section 54

Turnover of £36m or more: publish a slavery and human trafficking statement every financial year.

ALL AUTHORITIES

Procurement Act 2023

A modern slavery conviction is a mandatory exclusion ground. Evidence of the conduct, without a conviction, is a discretionary one.

CENTRAL GOVERNMENT

Procurement Policy Note 009

Departments and their agencies assess modern slavery risk in new and existing contracts, and use the Modern Slavery Assessment Tool (MSAT) with suppliers.

THE NHS

The 2025 Regulations

In force 17 May 2026. A legal duty to assess the risk before award and through the life of the contract, at any value.

Local government, housing and education buy under the same Procurement Act — and many councils have signed the Charter Against Modern Slavery.

Where it shows up in a contract

Four points at which a buyer looks at you.

1

Before the tender

The buyer rates the contract for modern slavery risk, by category and by where the goods or labour come from.

2

At selection

Exclusion grounds are checked. You are asked for your statement — or your position, if you are below the threshold.

3

At award

In higher-risk categories, scored questions on how you manage the risk on this contract.

4

In delivery

An assessment such as MSAT, performance indicators, audits, and a corrective action plan if something is found.

Stage four is where weak answers get found out: the tender response was fine, and there was nothing behind it.

Under £36m? You will still be asked

The threshold decides whether you must publish. It does not decide whether a buyer asks.

What suppliers assume

- We are under the threshold, so it does not apply
- A policy on the website is enough
- It is a form you fill in at tender stage
- Our suppliers are their own problem
- Nobody checks

What buyers actually do

- Ask for your position, whatever your size
- Ask how the policy is applied, and for the evidence
- Reassess through the life of the contract
- Ask what sits below you: subcontractors, agency labour, main suppliers
- Score it

"Too small" is not an answer. Proportionate, yes — but you are expected to have looked.

What a Modern Slavery Statement covers

The six areas set out in the Act.

1. **Your organisation, business and supply chains**
2. **Your policies on slavery and human trafficking**
3. **Your due diligence processes**
4. **Where the risk sits, and the steps taken to manage it**
5. **How effective you have been, against performance indicators**
6. **The training available to your staff**

And it must be

- Approved by the board
- Signed by a director
- Published, with a link on your homepage
- Updated every financial year

Areas 3, 4 and 5 are where most statements run thin — and they are the three about your supply chain.

Source: Modern Slavery Act 2015, section 54; Home Office Transparency in Supply Chains statutory guidance.

The bits that are usually missing

What a buyer sees in ten seconds — and the modest thing that fixes each.

Common gap	What good looks like
Policies listed, nothing on how they are applied	**One line on who owns it and how it is checked**
"We work with trusted suppliers" — no picture of the supply chain	**A simple list of main suppliers: what they provide, and where**
No risk assessment by category or country	**Suppliers ranked high, medium and low, with the reason**
Nothing measured	**Three or four numbers: suppliers assessed, staff trained, issues closed**
Last year's statement with a new date	**A short section on what changed, and what is planned**

None of these needs a consultant. They need you to have done the looking, and to write down what you found.

Where the risk sits

Buyers grade your exposure by where you source, what you buy, and who does the work.

HIGHER RISK

- Construction and trades
- Cleaning and facilities
- Textiles, uniforms and PPE
- Food and agriculture
- Logistics and warehousing
- Agency or migrant labour
- Long, subcontracted chains

MEDIUM RISK

- Some outsourced or agency labour
- Mixed UK and overseas sourcing
- Limited sight below your direct suppliers
- Manual-labour services

LOWER RISK

- Salaried, UK-based teams
- Short, transparent chains
- Professional and office services
- But never zero

Most suppliers sit higher than they think. Uniforms, cleaning products, summer agency staff: three higher-risk lines.

BEFORE YOU WORRY

Nobody expects perfection.

There is no such thing as a supply chain with no risk. What buyers want is a process they can see — not a flawless one.

You do not need to be perfect. You need to be able to show your working.

The seven areas buyers weigh

A credible supplier can show something in each.

1. **Governance & accountability**
   A named owner, and the board sees it
2. **Policies & procedures**
   Modern slavery policy and supplier code of conduct
3. **Risk assessment & supply chain mapping**
   Who you buy from, where, and which carry risk
4. **Due diligence & controls**
   Screening, contract clauses, corrective action
5. **Worker protection & reporting**
   A way to raise a concern, and a response
6. **Training & capability**
   Staff and buyers know what to look for
7. **KPIs & continuous improvement**
   What you measure, and whether it is improving

You do not need Platinum. You need a plan

Each of the seven areas is scored on four levels.

Bronze

A basic position. A policy exists and somebody owns it.

Silver

Standards documented, suppliers screened, risks understood.

Gold

Evidence-led: audits, corrective actions, tracked indicators.

Platinum

Embedded, led by the board, improving every year.

The goal is to know where you sit today, area by area, and to have a credible plan to move up.

An honest Bronze with a plan beats a vague claim of excellence. It also gives you something to write under "progress" next year.

How to monitor your supply chain

Six steps. None of them needs a big budget.

1 List your main suppliers

First tier only: the people you pay directly.

2 Rank them by risk

What they supply, where from, how much labour.

3 Ask them

Send the higher-risk ones a set of questions.

4 Score what comes back

So you can compare, and see who needs attention.

5 Follow up

An action, an owner, a date — and evidence when done.

6 Repeat, and keep the record

Every year. The record is your answer to the buyer.

By hand, this is a spreadsheet, a lot of emails and a folder nobody can find.

From evidence to statement

Do the monitoring first, and the statement becomes a report of what you did.

Assess
Your own organisation, and your suppliers

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Score
By area, for each of them

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Plan
Gaps become actions with owners and dates

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Evidence
Collected as each action is closed

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Statement
Written from the evidence you hold

- "We assess our suppliers annually" — there is a record of the assessments
- "We identified risk in cleaning and agency labour" — there is a risk rating behind it
- "We took action" — there is a closed action with evidence attached

That is the difference between a bunch of nice words and a statement a buyer will believe.

How to score well on MSAT

The government's Modern Slavery Assessment Tool: 31 questions in six sections. This is what they look for.

MSAT asks about	A strong answer shows
Your supply chain	Mapped beyond Tier 1, with the higher-risk locations named
Policies	Specific provisions: no recruitment fees charged to workers, no keeping of identity documents. Approved by senior management, and binding on high-risk suppliers
Risk	High-risk categories, worker groups and suppliers named — and your own buying practices assessed
Due diligence	A way for workers to raise a concern, supplier audits, and a set process when something is reported
Training	Covers the ILO's 11 indicators of forced labour; mandatory; repeated; offered to suppliers too
Indicators	KPIs set, reviewed by senior management every year, with a plan for the next 12 months

It rewards honesty: it asks whether you dropped a high-risk supplier, or worked with them to put it right.

Before you start: download the question set, bring in HR and purchasing, and respond to every recommendation at the end. Anyone can register, invited or not.

Source: Modern Slavery Assessment V.2 question set and guidance, supplierregistration.cabinetoffice.gov.uk/msat, read 10 October 2026.

How Supply Comply works

You audit yourself, then your supply chain — and the statement is written from what comes back.

1 You self-audit

Answer the 52 questions for your own organisation, across the seven areas.

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2 Invite your supply chain

Your Tier 1 and Tier 2 suppliers each receive a link.

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3 They complete the same audit

The same 52 questions, answered inside the tool. No spreadsheets, no chasing.

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4 Your risk profile builds

As the audits return, you see your supply chain by risk, supplier by supplier.

THEN IT GENERATES

A risk remedy plan

The gaps turned into actions, each with an owner and a date.

A compliant Modern Slavery Statement

Written from what the audits found, with the evidence behind it.

What Supply Comply gives you

The tool to monitor and measure modern slavery risk across your supply chain.

52 scored questions

Seven areas. Answer for your own organisation, and send to suppliers by link.

A risk rating

For each assessment, with a score for every section.

Your whole supply base

Average score, weakest area and highest-risk suppliers on one screen.

An improvement plan

Owned actions with due dates. None closes without evidence.

Your Modern Slavery Statement

Built from the evidence you hold, with board approval recorded.

Supply Comply does not replace MSAT. It gives you the evidence to answer it well, and covers your suppliers as well as you.

Part of the bidpiston family of tools · supplycomply.co.uk

Your next steps

Small, steady and demonstrable.

This week

- Read your statement against the six areas; mark what has no evidence
- Name who owns modern slavery in your business
- Work through the question list

This month

- List your main suppliers and rank them by risk
- Put a short supplier code of conduct in front of them
- Send your higher-risk suppliers the assessment
- Register for MSAT and complete it before you are asked

Ongoing

- Follow up poor scores with actions and dates
- Re-assess every year
- Rewrite your statement from the evidence, with what changed

Start with the questions

Everyone on this session receives the full Supply Comply question list as a PDF: all 52 questions, across the seven areas.

Check yourself

Go through it for your own business. Every question you cannot answer is a gap in your statement.

Check your suppliers

Pick your three highest-risk suppliers. Could you answer it for them?

Then measure it

Supply Comply scores it, tracks the actions and builds the statement.

Would rather talk it through? Get on a call with us.

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