
Metropolitan Police Service (MPS)

Slavery and Human Trafficking Statement 2021/22

Period covered by this statement

The MPS financial year-end occurs on 31 March. This statement covers the financial year 1 April 2021 – 31 March 2022.

Introduction

This statement articulates the commitment and intended actions of the Commissioner of Police of the Metropolis to address modern slavery through our business activities and supply chains. This statement is made in accordance with Section 54(1) of the Modern Slavery Act 2015.

When considering modern slavery and human trafficking, we are responsible for tackling those crimes, bringing offenders to justice, and safeguarding those at risk.

The UK's enactment of the Modern Slavery Act 2015 represented a pioneering step in transforming the UK's response to the exploitation of the most vulnerable and at-risk people.

The Modern Slavery Act 2015 was the first legislation of its kind in the world and now more victims than ever are being identified and supported; more offenders are being prosecuted; and thousands of companies are publishing their commitment to tackling Modern Slavery in their supply chains.

Someone is in slavery if they are:

- Forced to work through mental or physical threat
- Owned or controlled by an 'employer', usually through mental or physical abuse or the threat of abuse
- Dehumanised, treated as a commodity or bought and sold as 'property'
- Physically constrained or have restrictions placed on his/her freedom

We are committed to working in partnership with our suppliers to support and challenge them on their response to Modern Slavery, and we will ensure our progress is open and transparent, reporting where we have been successful and where we still have opportunities to improve.

This statement sets out the steps that we are taking to prevent modern slavery, human trafficking, forced and bonded labour and labour rights violations within the MPS and in our supply chain by informing suppliers, staff and the public about the MPS' policy concerning modern slavery and supply chains. It includes the steps we will take to prevent and mitigate relevant risks going forward.

1. Our Organisation and Supply Chains

The MPS is made up of more than 46,000 officers and staff, plus thousands of volunteers; we are one of the largest employers in London and the South East of England. The territory we serve covers 620 square miles and is home to over 8.6 million people. The MPS is the UK's largest police service and has 25% of the total police budget for England and Wales.

The MPS spends about £840 million each year on a diverse range of goods and services and we aim to procure them in the most cost effective and compliant way, while satisfying often-urgent operational needs. We proactively manage our large complex and operationally critical outsourced service contracts, to ensure that we receive the quality services we are paying for and achieve value for money through the entire life of the contract.

2. MPS' Operational Role in Tackling Modern Slavery

Over the past few years, modern slavery offences have steadily increased and it is important that officers have the right skills to investigate these often-complex cases, improve the quality of victim care and increase their engagement in the criminal justice process. Accountable to the Mayor and the Home Secretary, over the coming year in line with our previous statement we will:

- Continue to deliver a Modern Slavery Investigators course for the Central Specialist Crime Vulnerability Team, BCU officers and the wider MPS family. This will assist identification of Modern Slavery, safeguarding, enforcement and disruption.
- Continue to conduct joint training with the Crown Prosecution Service, the Directorate of Legal Services and specialist investigations, to improve prosecutions and the securing of civil orders under Modern Slavery Legislation.
- Introduce a strategic Modern Slavery Network in partnership with NCA, Border Force, Immigration Enforcement, GLA, CPS and NCA to ensure intelligence and investigative opportunities are maximised with a commitment to joint working.
- Work with Victim Navigators through Justice and Care to better victim engagement, safeguarding and more cases being successfully prosecuted.
- Work to improve the financial investigative capability applied to Modern Slavery investigations.
- Work more closely with international partners through the Foreign Law Enforcement Community (FLEC) Network.
- Continue to engage with overseas law enforcement agencies and partners to enhance investigations and work jointly on a number of multi jurisdiction operations.

- Actively support the creation of the Slavic Police Association to support Slavic heritage officers and develop closer links with Slavic communities within London that are disproportionately affected by Modern Slavery offending.
- Continue internal and external training to embed the new Pan London Child Exploitation Protocol, released in March 2021.
- Continue to drive Operations Sealscale and Enterprise to enhance collaboration with partners from the private sector, law enforcement and other Government agencies.
- Improve triage processes which will ensure that we maximise investigative opportunities.

In addition to the above, the MPS has a Modern Slavery regional coordinator that is shared with BTP and City of London Police. This role will continue to forge better working practises across traditional police boundaries.

The MPS has recruited a regional Organised Immigration Crime Co-ordinator who is charged with improving the MPS response in this area. A draft strategy, delivery plan and staffing proposal has been submitted.

In terms of our operational activity around County Lines and Child Criminal Exploitation, this has been extensive including:

- We have introduced several measures in order to identify those at risk of predatory sexual harm and those that are perpetrating it. This is captured through network analysis of linked crimes, mapping the use of police and judicial interventions and the introduction of Op Bassano that uses data to predict those that are not convicted but are suspected of being involved in serious harm.
- We have improved our review processes concerning how information is shared with our partners, such as social services, and also ensuring that all information that is shared with us is recorded in a durable and retrievable format.
- We have improved the level of support that frontline officers and local investigators receive from our dedicated specialist units ensuring that the appropriate expertise in responding to modern slavery is applied to all investigations and enquires
- We are improving the ability of officers to identify relevant vulnerabilities with victims of criminal exploitation by training officers in collaboration with the Children's society around issues such as Adulthood.

Given the role of the MPS in fighting against Modern Slavery, as described above, it is obviously important for the MPS to do all it can to stop it from occurring in its supply chain.

3. Policies in Relation to Slavery and Human Trafficking in the Supply Chain

The MPS, through the Mayor's Office for Policing and Crime (MOPAC), is a functional body of the Greater London Authority led by the Mayor of London and is therefore required to align and contribute to Mayoral policy and strategy.

The MPS is a signatory of, and conducts its business in accordance with, the GLA Group Responsible Procurement Policy¹, and GLA Group Responsible Procurement Implementation Plan², a high-level strategic document setting out the GLA Group's plans, ambitions and commitments within procurement activities. It reflects best practice and demonstrates that the MPS commercial activities meet all legislative requirements, including those enshrined in the Modern Slavery Act 2015.

The MPS, through its commitment to the GLA Group Responsible Procurement Policy, is committed to the promotion of ethical sourcing by:

- Adopting the provisions of the Ethical Trading Initiative (ETI) Base Code³ as the standard we expect of our suppliers to support working conditions that are legal, fair and safe. Greater emphasis on ETI has been focused in the Social Value questions within tenders e.g. suppliers outlining how they advocate these initiatives including that employment is freely chosen, working conditions are safe and hygienic and no harsh or inhumane treatment is allowed.
- Identifying contracts and areas of spend where there may be a high risk of poor working conditions, human rights abuses or negative impacts on security and crime. We will be working with Commercial leads on contracts identified that suppliers have safeguards and practices in place to ensure that these risks are addressed by the business and throughout their supply chains. In areas of spend that have a high risk we now ask Suppliers invited to tender to confirm that they will join Sedex and undertake the Modern Slavery Assessment Tool
- Seeking to improve transparency within the supply chain, and working with suppliers to improve any poor performance identified as part of a process of continuous improvement, reflecting existing and emerging legislation and guidance. We will follow up with those suppliers who have completed their Modern Slavery Assessment Tool whose results are below 70% to improve their assessment.

The MPS also aligns with the guidance published within the Government Procurement Policy notice 05/19: Tackling Modern Slavery in Government Supply Chains published in September 2019.

Addressed

4. Risk Assessment and Management

The highest risks of people falling victim to modern slavery in our UK-based supply chain include construction workers and those undertaking service contracts in sectors such as cleaning, catering and security, where low pay, migrant labour and/or indirect labour are prevalent.

The highest risks of poor working conditions and human rights abuses from our global supply chain are associated with the production and manufacture of electronic equipment, textiles and construction materials. The mining and extraction of conflict

¹ <https://www.london.gov.uk/rp-policy>

² https://www.london.gov.uk/sites/default/files/gla_group_rp_ip_final_for_publishing.pdf (due to be updated Q2 22/23)

³ <https://www.ethicaltrade.org/eti-base-code>

minerals such as copper, lithium, nickel and cadmium, used in the production of batteries for electric vehicles are also of increasing concern.

As with our 2020/21 statement, the MPS recognises the corresponding source countries and associated sector risks in its supply chains for these categories, these continue to be as follows:

Category	Country	Identified Sector Risks
Construction	United Kingdom	Multi-tiered supply chains involving use of labour agencies which could result in poor labour practices due to lack of transparency. Unethical practices may include workers being charged unlawful or excessive recruitment fees, workers being misinformed about terms of employment, and the withholding of passports.
Facilities Management: cleaning & catering services	United Kingdom	Low skilled labour; migrant labour; agency labour leading to lack of transparency on employment practices.
Electronic Equipment	Examples include China, India, Mexico	Labour intensive, often low-skilled work; mining of raw materials in high-risk countries for example batteries. Poor labour practices may include underpayment of wages, delayed payment or wage deductions; physical abuse; working excessive overtime; worker's visa or permit is tied to a single employer, and financial penalties for early contract termination
Uniforms and Work wear	Examples include Bangladesh, China, India, Pakistan, Sri Lanka and Morocco	Risks may include gender inequality; weak protection of workers' rights; poor labour practices including excessive overtime, underpayment or deduction of wages, financial penalties for leaving employer and structural integrity of

		factories.
Batteries	Cobalt – Examples include Democratic Republic of Congo (DRC); Lithium - Australia, Chile, China; Nickel – Canada, Indonesia, Philippines and Copper – Chile.	Sourcing of cobalt presents significant risk of exposure to human rights abuses in the supply chain. Political instability or conflict particularly in the DRC; weak protection of civil liberties and workers' rights; safe and healthy working conditions in mines can be poorly regulated and protected.
Personal Protective Equipment (PPE)	China	Similar risks to those for uniforms and work wear, compounded by the rapid increase in global demand from coronavirus resulting in pressure on manufacturers to produce large quantities in short timeframes.

The MPS is committed to ensuring the highest ethical standards and practices, including safe working conditions and the protection of workers' rights, across its business and expects its suppliers to demonstrate the same commitment.

The MPS' Commercial Services function is leading the MPS' implementation of the Responsible Procurement policy and is supported by the GLA Group's Central Responsible Procurement Team which has a remit to support the GLA Group functional bodies in delivery responsible procurement activities.

The Commissioner of Police of the Metropolis is committed to ensuring contracts are compliant with the Modern Slavery Act 2015. Commercial organisations with a turnover in excess of £36 million are required to give a Statement on Slavery and Human Trafficking in their supply chain. All suppliers must provide annual updates on their Slavery and Human Trafficking statement, if the supplier has a turnover in excess of £36 million.

5. Due Diligence

Since our 2020/21 statement we have progressed the below areas that we stated we were implementing or progressing. This includes our commitments following the formation of the GLA Modern Slavery Delivery Group for example launching the Sedex and MSAT campaigns

We have implemented a Commercial Life Cycle Management system (CLM) that includes a risk management module. This enables greater scrutiny of our suppliers and supply chain allowing the MPS to highlight, mitigate and manage risks including modern slavery and ethical sourcing. The MPS continues to ensure all relevant procurements

include a question at supplier selection stage on compliance to Section 54 of the Modern Slavery Act 2015.

We will be finalising and publishing our Supplier Code of Conduct. This aligns with the College of Policing, and seeks to ensure that suppliers carry out their operations to the highest of standards and will be communicated to our supply base.

In all tenders, we now require bidders agree to commit to undertaking due diligence in their supply chain to identify and manage the risks of modern slavery. We have updated our tender documentation to ask potential suppliers to join Sedex and Electronics Watch (EW)⁴ (where applicable) and to comply with the Ethical Trading Initiative Base Code. The MPS is committed to understanding its supply chains better and working towards greater transparency and responsibility for people working within them. We will continue to work with our suppliers and partners to manage areas of risk and strategies that ensure human rights across the supply chain.

Sedex is a membership organisation that provides an online platform for companies to manage and improve working conditions in global supply chains. Participants are able to upload supplier audit reports and view other reports provided by other Sedex members, therefore increasing the collective understanding of supplier working environments. They also conduct independent factory audits.

We launched a Sedex campaign in February 2022 and asked 45 of our suppliers, where there is a high-risk of modern slavery across the supply network, to sign up for Sedex membership. At 31st March 2022, 22% of these suppliers had registered.

The MPS is committed to understanding its supply chains better and working towards greater transparency and responsibility for people working within them. We will continue to work with our suppliers and partners to manage areas of risk and strategies that ensure human rights across the supply chain.

In January 2022, we invited 45 suppliers to complete the Modern Slavery Assessment Tool (MSAT). MSAT goes further than the production of a Modern Slavery Statement and is an online Cabinet Office tool that assesses the effectiveness of suppliers' corporate commitments to the Modern Slavery Act and whether they have appropriate governance and policies in place. At 31st March 2022, 42% of these suppliers had undertaken the assessment. Those suppliers with scores over 70% are considered to have appropriate measures in place. We will be approaching those suppliers with scores less than that and working with them to put an action plan in place to improve their policies and due diligence.

6. Training and Awareness Raising

As part of our 2020/21 statement, we stated we would commit to raising awareness of modern slavery risks to Commercial Staff and our Suppliers.

In November 2021, Commercial Services held a Supplier Conference event that was attended by a number of MPS key suppliers. Included on the day was a presentation on

⁴ <http://electronicswatch.org/en>

modern slavery from an operational perspective, this highlighted risk of modern slavery in the workforce and educated suppliers as to the key indicators of which they need to be aware.

During 2021/22 everyone involved in commercial activities undertook ethical and responsible procurement training and 100% of commercial staff have completed the Government Commercial Function (GCF) training on Modern Slavery in the Supply Chain.

In 2022/23 we will ensure that new staff involved in commercial activities will undertake the GCF training in Modern Slavery. Any further training identified in this area will be rolled out across Commercial Services.

Commercial Services has participated in 3 advisory groups over the last 3 months to highlight our efforts in addressing Modern Slavery, these were the External Reference Group, the Race IAG and the LGBT.

7. Key Performance Indicators to Measure Effectiveness

The MPS will measure its performance as follows:

- In collaboration with other functional bodies through the GLA Modern Slavery Delivery Group initially focusing on the Modern Slavery Commitments within the new GLA Responsible Procurement Implementation Plan. There will be a high focus to identify types of contracts where there is a high risk of poor working conditions, human rights abuses or negative impacts on security and crime. MPS contracts identified will have been documented and the steps taken with our suppliers to minimise the risks will have been evidenced.
- 100% of staff joining Commercial will have completed the Government Commercial College training on Modern Slavery in the Supply Chain.
- Through our Commercial Risk Assessments we will have measured that our strategic and category 2 suppliers on our CLM system who fall in scope that have confirmed their agreement to undertake due diligence on their supply chain in relation to modern slavery and human trafficking, and that they will fulfil their obligations in accordance with the Modern Slavery Act 2015.
- We will have ensured that we continue to target our suppliers, where there is a high-risk of modern slavery across the supply network, to sign up for Sedex membership and to complete MSAT. Using our Commercial Risk Assessment tool we will ensure that they submit their latest Sustainable procurement policy.
- The MPS is committed to dealing with instances where Modern Slavery is alleged and / or encountered and will naturally fully investigate circumstances if apparent working closely with those individuals affected, contractors and our police teams if necessary.
- Our aspirations over 2022/23 will entail providing greater awareness to both our suppliers and commercial staff of modern slavery risks in the supply chain. This

will be achieved through resources such as any training or initiatives developed at the GLA Modern Slavery Delivery Group, promoting Modern Slavery awareness at the MPS Supplier Conference in November. This will include informing suppliers of the importance of joining Sedex and completing MSAT.

8. Action Plan for 2022/23

Next year we intend to complete on-going work ensuring that ethical sourcing risks are assessed at the tender stage of all contracts, especially those within significant or high-risk sectors, particularly construction, electronics and uniforms. We will:

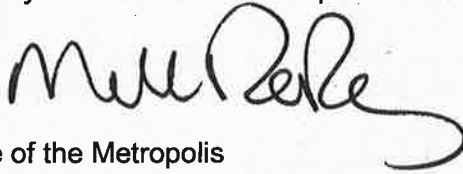
- Continue to roll out training to key commercial staff who manage contracts identified with a high area of risk of modern slavery or ethical sourcing.
- We will work alongside the other GLA Group functional bodies with Transparency in the Supply Chain (TISC) to improve how we assess supply chain compliance to Section 54 of the Modern Slavery Act 2015 (as well as other social and economic policy measures). As of March 2021/2022, 85 per cent of the MPS' Strategic Suppliers and Category 2 Suppliers have issued a statement compliant to Section 54 of the Act. We will engage with more of our key suppliers to improve their performance against Section 54. Additionally, with the implementation of our CLM system and tender documentation, we will ask all our suppliers to confirm that they will produce an annual Modern Slavery Statement. The MPS will monitor our suppliers' compliance with this.
- When suppliers log onto our CLM system, we will also require them to confirm their agreement to undertake due diligence on their supply chain in relation to modern slavery and human trafficking, and that they will fulfil their obligations in accordance with the Modern Slavery Act 2015.
- We will work closely with our construction and facilities management team, seeking assurances that MPS Construction projects and facilities management contracts are aware of and working to reduce the risk of modern slavery activities within these areas.
- We will continue to undertake a risk assessment of our key suppliers to identify medium and high-risk suppliers. Work with our key suppliers assessed to be medium and to high risk, in eradicating the risks of Modern Slavery in their organisations and their supply chains. Relevant suppliers will complete the Governments Modern Slavery Assessment Tool (MSAT) and encouraged to develop improvements plans based on recommendations.
- We will follow up with those suppliers who have either not yet started their MSAT, or whose results are below 70%.

- We will continue to urge our high-risk suppliers to join Sedex, or to share their results if they are already members.

Signatory

This statement has been reviewed and approved by the MPS Management Board. This statement is sponsored by the MPS Chief of Corporate Services and will be reviewed annually.

[Name of Signatory]



[Date]

4/12/22

Commissioner of Police of the Metropolis