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# UK Parliament Modern Slavery Statement

2022/2023



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# Foreword

Modern slavery is an extremely pervasive crime. The International Labour Organisation estimates that almost 50 million people live in modern slavery. This number has increased by 10 million in the space of five years. Without proper strategies in place to tackle this awful crime, this number will only continue to increase.

At the UK Parliament we are committed to tackling modern slavery and mitigating risks within our supply chain. We buy just over £300 million of goods and services per year, which gives us considerable purchasing power and the ability to influence suppliers to improve their anti-slavery practices. There is no room for modern slavery, either in Parliament or in our supply chains, and we are committed to ensuring that taxpayers' money does not inadvertently fund this crime.

This is our third Modern Slavery Statement. It details our approach to tackling modern slavery, working with colleagues, suppliers and external partners to mitigate emerging risks. In the last year, we have continued to make progress towards our goals, particularly in refining our policies, carrying out detailed risk assessments and building on our due diligence approach to make our supply chains more resilient to modern slavery. In addition, we have ensured more staff across both Houses of Parliament are trained to spot the signs of modern slavery.

Legally, the UK Parliament is not required to produce an annual Modern Slavery Statement. However, we have chosen to do so as this aligns with the values of both Houses and our commitments to diversity and inclusion – and, ultimately, because it is the right thing to do.

Our statement demonstrates our commitment to maximising transparency by giving the public a full understanding of the steps we have taken to prevent modern slavery in our supply chains. We know that there is still a journey ahead of us to further develop our resilience to the risk of modern slavery, however we will keep going until we are confident that vulnerable people are protected from exploitation and treated with the dignity and respect that they deserve.



**Rt Hon Sir Lindsay Hoyle MP**  
The Speaker of the House of Commons



**The Rt Hon the Lord McFall of Alcluith**  
The Lord Speaker

A handwritten signature in blue ink, reading "Lindsay Hoyle".

A handwritten signature in blue ink, reading "John".

# Executive Summary

This statement details the steps that the UK Parliament has taken between 1 April 2022 and 31 March 2023 to mitigate and prevent modern slavery risk within our business operations and supply chains.

This is our third Modern Slavery Statement, published in alignment with [Section 54 of the Modern Slavery Act \(2015\)](#). We have published this statement as we believe that transparency is key to tackling modern slavery in global supply chains.

We welcome constructive feedback on our statement and the work detailed within it. If you would like to share feedback, please email [socialsustainability@parliament.uk](mailto:socialsustainability@parliament.uk).

## Definitions<sup>1</sup>

**Modern slavery refers to situations of exploitation that a person cannot leave due to coercion, use of force, abuse of vulnerability, deception or other means. It is the illegal exploitation of people for personal or commercial gain and is a violation of fundamental human rights. Modern slavery is an umbrella term that encompasses a wide spectrum of crime, including:**

- **Slavery**  
Ownership of another person as personal property.
- **Servitude**  
Complete control over a person short of owning them.
- **Forced and compulsory labour**  
Work performed involuntarily due to the threat of punishment.
- **Child labour**  
Illegal or exploitative work performed by a child.
- **Human trafficking**  
Movement of people without their consent for the purpose of exploiting them.
- **Bonded labour**  
Forced work to repay a debt.

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<sup>1</sup> These definitions are from the [Equality and Human Rights Commission \(EHRC\)](#), the [International Labour Organization \(ILO\)](#) and the [Gangmasters and Labour Abuse Authority \(GLAA\)](#).

## Parliament's Modern Slavery Programme and the Sustainable Development Goals (SDGs)

The UN's Sustainable Development Goals (SDGs) set out 17 aspirations for the world to achieve by 2030. They have been widely adopted and now represent best practice for organisations reporting their impact on society<sup>2</sup>. As a consequence, Parliament is for the first time reporting on how our Modern Slavery Programme positively impacts on a set of SDGs.



- **SDG 8 – Decent Work and Economic Growth**

A proactive approach against modern slavery encourages people to speak out against oppressive working environments, supporting decent work.

- **SDG 10 – Reduced Inequalities**

Paying the London Living Wage fosters a supportive working environment that promotes equality. Additionally, working to mitigate modern slavery risks contributes to reducing inequalities in wider society.

- **SDG 12 – Responsible Consumption and Production**

Carrying out due diligence and engaging with suppliers helps Parliament to source products and services more responsibly.

- **SDG 16 – Peace, Justice and Strong Institutions**

Our commitment to escalate potential modern slavery concerns and follow strong remediation principles will help achieve justice for potential victims.

- **SDG 17 – Partnerships for the Goals**

Parliament works with internal and external partners to share knowledge and support a best practice approach.

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<sup>2</sup> The House of Commons International Development Committee's December 2022 report [Extreme poverty and the Sustainable Development Goals](#) emphasised the need for the UK to reaffirm its commitment to the SDGs.

## Progress update: Summary of key developments in 2022-2023

Below we provide a brief summary of the key developments made in the last financial year. We also update on the progress made against the goals outlined in Parliament's previous [Modern Slavery Statement](#).

### Training, Awareness Raising and Internal Advocacy

**This year we incorporated a modern slavery module into mandatory e-learning that all House of Commons and Parliamentary Digital Service (PDS) staff must complete on joining and repeat on an annual basis. This will reach over 3000 colleagues in the next year and will be extended to all House of Lords staff.**

As of 31 March 2023, we also trained 135 colleagues through 'Introduction to Modern Slavery' training sessions. These sessions are optional for staff and offer more in-depth learning content than the mandatory training available.

We have also delivered specialised commercial training to 110 contract managers, our staff responsible for buying goods and services. 24% of current contract managers have received this training and we will be working closely with our commercial team to increase this figure to 60% in the next financial year.

This year we established a Modern Slavery Response Group made up of 18 colleagues from different departments who will play a key role in responding to potential incidents of modern slavery. We trained group members on how to respond to modern slavery incidents that may occur on the Parliamentary Estate or in the supply chain.

Parliament also expanded its modern slavery awareness raising activities. This included:

- The development of an online hub signposting staff to modern slavery information.
- Wider inclusion of modern slavery information in parliamentary newsletters and on the staff intranet.
- A range of training and awareness raising activities around Anti-Slavery Day in October 2022.
- Hosting of the Anti-Slavery Day Awards by the All-Party Parliamentary Group (APPG) on Human Trafficking and Modern Slavery.

In addition, we sent a bulletin to 150 suppliers detailing Parliament's commitment to tackling modern slavery in collaboration with its supply chain.

Over the past year, we have also developed our internal advocacy approach for our senior leadership. We have created new Terms of Reference for the Anti-Slavery Board Advocates detailing how their roles work and emphasising their responsibility in providing visible senior advocacy for the anti-slavery work at Parliament.

For more information, see sections: [Training](#), [Awareness raising](#), [Supplier engagement](#) and [Management Board Advocates](#).

(These developments link to [goals 1, 2, 3, 4, 5 and 6](#) at the end of the 2021-22 statement).

## Risk Assessment and Mitigation

Using recent research on forced labour in supply chains, we carried out a risk assessment to identify our highest risk suppliers, resulting in 92 high-risk suppliers being identified out of the 504 suppliers and contractors providing goods and services to Parliament. In February 2023, we sent out Modern Slavery Assessment Tool (MSAT) questionnaires to the first wave of these high-risk suppliers. We focused on the following areas:

- Catering and food processing (including food and drink)
- Clothing and textiles
- All contracts valued over £5 million

As of 31 March 2023, 64% of the suppliers in the first wave had completed the MSAT. We have continued to engage regularly with the remaining suppliers to increase this number in the new financial year and aim to be at or near 100% completion for the first wave by March 2024.

Two further waves will include the remainder of Parliament's highest risk suppliers, drawn from the following sectors:

- Construction
- Facilities management (including cleaning, maintenance and security)
- Health and social care
- Logistics
- Manufacturing and electronics
- Recruitment

Following the receipt of MSAT responses from our first wave of high-risk suppliers, we analysed the results to identify trends and areas for improvement. Once we have sent out the remaining MSAT questionnaires in 2023-2024, we will analyse the full collection of results to identify trends that will inform our risk mapping and supplier engagement approach, and to start to better understand Tier 2 of our supply chains.

We have also now implemented the Social Value Model. This means that whenever Parliament buys goods or services valued over £50,000, we are committed to asking at least one question on social value when we invite suppliers to bid for the work. Responses to these social value questions are then scored as part of the evaluation process and make up at least 10% of the score used to decide on a supplier.

If an upcoming procurement is deemed to be at high risk of modern slavery, we will ask a social value question focused on modern slavery mitigation. Potential suppliers will be asked to explain how they will identify and manage risks of modern slavery in the contract workforce and/or supply chain.

To aid with this, we have developed a modern slavery risk assessment tool for new procurements. This will support commercial staff in identifying the key modern slavery risks within upcoming procurements and selecting relevant questions to ask potential suppliers about their modern slavery risks.

For more information, see sections: [Risk Assessment](#) and [Procurement](#).

(These developments link to goals [7, 8, 9, 10 and 11](#) at the end of the 2021-22 statement)

## Due Diligence

**We have worked with experts inside and outside of Parliament to develop a process to ensure concerns of modern slavery are properly reported, escalated and remediated. This process will be fully implemented into relevant policies and reporting procedures across Parliament in 2023-2024.**

Parliament remains committed to transparency regarding potential incidents of modern slavery and encourages its suppliers to do the same. This year, we used the experience gained from uncovering an incident of modern slavery in our supply chain in 2022/23 to develop the escalation and remediation process described above.

For more information, see section: [Due Diligence Processes](#).

(These developments link to [goals 12 and 13](#) at the end of the 2021-22 statement)

**We have set ourselves goals at the end of this statement for 2023/24, many of which build on the progress made against last year's goals.**

# 1. Structure, Business and Supply Chains

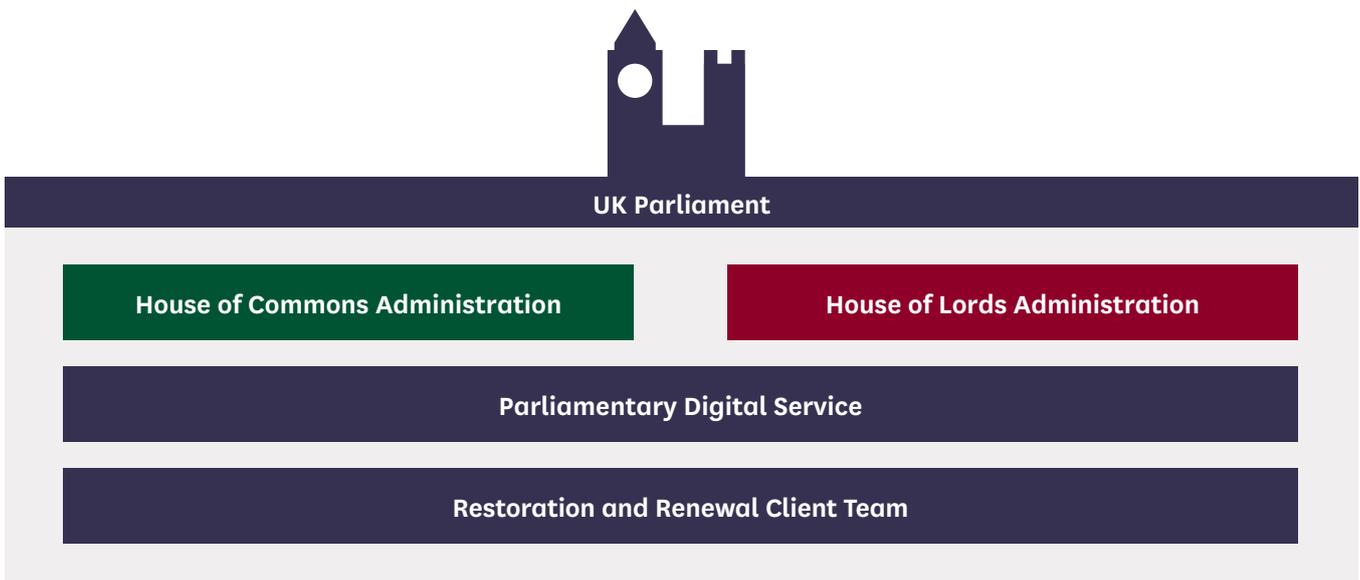
## Overview of the UK Parliament

### Structure of Parliament

The UK Parliament workforce is made up of the House of Commons Administration, the House of Lords Administration, the Parliamentary Digital Service (PDS) and the Restoration and Renewal Client Team. Our workforce includes a diverse skill set and demographic, which contributes to the effective operation of Parliament. The House of Commons and House of Lords are separate employers and PDS and the Restoration and Renewal Client Team work as joint departments.

The majority of the parliamentary workforce are employees on permanent contracts. In addition to the employed teams, there are a significant number of contractors working on major estate works and a number of services where there is outsourced provision and other companies providing services. As of 31 March, the UK Parliament workforce figure totalled 4016.

Both Houses of Parliament are accredited by Citizens UK as London Living Wage Employers<sup>3</sup>. This applies to our direct employees, our contractors and their sub-contractors if they have personnel working directly on UK Parliament premises or are providing services to Parliament from another location in London. Additionally, suppliers and subcontractors which provide services from outside of London will be expected to pay their dedicated personnel at least the UK Living Wage.



3 The payment of living wages can protect workers against forced labour. See Walk Free. 'A living wage: a crucial tool in the fight against modern slavery', 2019.

## Internal governance of anti-slavery work

### Parliament's Modern Slavery Programme

**Parliament's Modern Slavery Programme was established in 2020. The programme ultimately reports to the boards of both Houses.**

Since September 2021, the Modern Slavery Programme has been managed by Parliament's Social Sustainability Team, which works across Parliament on behalf of both Houses and PDS. The Social Sustainability Team is responsible for developing Parliament's approach to social sustainability, with a focus on diversity and inclusion, health and wellbeing, community engagement and business ethics. This team focuses particularly on the approach to supply chain management in these areas. Modern slavery fits into this wider programme of work, under the business ethics workstream.

### Management Board Advocates

**The House of Commons Executive Board and the House of Lords Management Board have both nominated board-level Anti-Slavery Advocates.**

Anti-Slavery Board Advocates are senior champions for the Modern Slavery Programme and actively support Parliament's commitment to tackling modern slavery. As part of this, they are members of our Advisory Group.

Our Anti-Slavery Board Advocates commit to:

- Be visible leaders and advocates for the Modern Slavery Programme.
- Act as role models in demonstrating behaviours and actions to promote Parliament's commitment to tackling modern slavery.
- Raise awareness of Parliament's modern slavery work at board level.
- Provide the Social Sustainability Team with strategic advice to help fight modern slavery.

Last year, we created a new Terms of Reference for the Anti-Slavery Board Advocates, detailing how their roles work and emphasising their responsibility in providing visible senior advocacy for the anti-slavery work at Parliament. We followed the BSI standard on organisational responses to modern slavery, BS 25700, which sets a benchmark for the role of top management and leadership in modern slavery prevention and mitigation

### Advisory Group on Modern Slavery and the Supply Chain

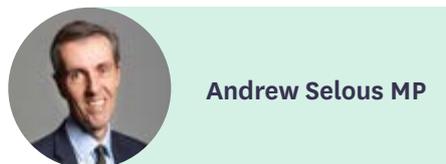
**Parliament's Advisory Group on Modern Slavery and the Supply Chain meets at least twice a year and provides a forum for discussion and the sharing of anti-slavery best practice. It is comprised of Members of both Houses from across political parties and a number of specialists on modern slavery and ethical business.**

Throughout the year the Advisory Group has discussed different research and evidence on modern slavery issues. The topics addressed include:

- Best practice in using the Modern Slavery Assessment Tool.
- Effective escalation and remediation processes for victims of modern slavery.
- The use of Uyghur Forced Labour in Xinjiang.

## Membership of Parliament’s Advisory Group on Modern Slavery and the Supply Chain

In March 2022, Peter Bone MP was appointed as chair of the group. Mr Bone has been the Conservative Member of Parliament for Wellingborough since 2005. Formerly the co-chair of the APPG on Human Trafficking, tackling the issue of modern slavery has always been one of Mr Bone’s priorities as a Member of Parliament. The full membership is below:



## Social Sustainability and Modern Slavery Working Group

Our Social Sustainability and Modern Slavery Working Group oversees Parliament's social sustainability agenda, including the Modern Slavery Programme. The working group is a space for discussion and incorporates colleagues from:

- Business Management
- Diversity and Inclusion
- Environmental Sustainability
- Learning and Development
- Procurement
- Restoration and Renewal<sup>4</sup>
- Social Sustainability

The working group provides accountability for our modern slavery goals and supports the advancement of the programme.

## Partnerships

### Metropolitan Police (MSCE Unit)

In early 2023, we started working more closely with the Metropolitan Police Modern Slavery and Child Exploitation (MSCE) Unit to benefit from their expertise in responding to incidents of modern slavery. They provided input into the development of Parliament's escalation and remediation process for potential victims of modern slavery. We will continue to build this relationship in 2023-24.

### Modern Slavery & Procurement Implementation Group

UK Parliament has representation on the cross-government Modern Slavery & Procurement Implementation Group, a group of government departments and public bodies collaborating to implement positive anti-slavery practices in public procurement. The group meets every few months and collaborates to implement best practice and government advice on how to tackle modern slavery in supply chains.

### Slave Free Alliance

Slave Free Alliance has supported us in the development of an escalation and remediation procedure, following the project kick-off in 2022. In the last year we have worked closely with Slave Free Alliance to train our Modern Slavery Response Group on how to respond to modern slavery incidents in the supply chain and on the Parliamentary Estate.

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<sup>4</sup> Restoration and Renewal is Parliament's programme to restore the Palace of Westminster.

# Procurement

## Introduction to public sector procurement

**Procurement is the buying of goods and services from other organisations for operational purposes. As a public sector organisation, Parliament must follow strict processes detailed in our [Parliamentary Procurement Rules](#).**

Parliament considers purchases below £50,000 to be ‘Low Value Procurement’. These follow a simpler process that is nonetheless subject to the public procurement best practice principles including non-discrimination, equal treatment, and transparency. For procurements over £50,000, Parliament will start a formal competitive tender<sup>5</sup> process.

When seeking to purchase goods or services, Parliament will publish a notice inviting companies to submit tenders. Parliament will set requirements that the companies submitting tenders must follow, including requirements related to modern slavery, as is explained in the sections below.

## Parliament’s procurement functions

**The Parliamentary Commercial Directorate (PCD) is responsible for all procurements conducted in the House of Commons, the House of Lords and PDS. It is currently updating its operating model following an [independent review of financial management by Lord Morse](#).**

Parliament gives responsibility for managing procurement contracts to staff called contract managers. All contract managers must attend training on procurement policies and complete the Government Commercial Function Contract Management Foundation Training. We also offer them bespoke training on modern slavery.

## Summary of supply chains

**The UK Parliament buys a large range of goods and services to support its operations, including construction, facilities management, hardware, digital services, food and uniforms.**

As of 31 March 2023, Parliament has 857 contracts in place with 504 suppliers and 283 contract managers managing contracts across the organisation. Parliament spends approximately £188 million buying goods and services and £114 million on capital works projects and programmes, from our direct suppliers, the majority of which are UK-based.<sup>6</sup>

Many of our suppliers have complex supply chains with multiple tiers in other countries, so we have worked to increase our understanding of the organisations that provide goods and services to our suppliers. Please see the [Risk Assessment](#) section for more information on this.

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<sup>5</sup> A tender is an offer to provide goods or services.

<sup>6</sup> Approximate spend figures cover the financial year 1 April 2022 to 31 March 2023 and have been used for illustrative purposes. The House of Commons and House of Lords 2022/23 annual accounts are available [here](#) and [here](#).

## Facts and figures on Parliament spending



### The Social Value Model (PPN 06/20)

Parliament has implemented the UK Government's [Social Value Model](#). This requires Parliament to explicitly evaluate how the suppliers responding to a tender would bring wider economic, social and environmental benefits while supplying goods or services to Parliament.

The Social Value Model was first published in the Government's [Procurement Policy Note \(PPN\) 06/20](#). PPNs set out how public sector organisations can follow best practice when buying goods and services. As Parliament is not a government body, it is not required to comply with this guidance; however, we aim to align our approach with best practice and have therefore implemented the Social Value Model into our procurement process.

As a result, for all procurements valued over £50,000, we ask suppliers bidding for work to explain how they will support social value requirements when carrying out the contract.

Parliament focuses on the following areas within the Social Value Model:

- Tackling economic inequality
- Fighting climate change
- Equal opportunity (including modern slavery)
- Wellbeing

We have developed a social value question bank with a variety of questions based on these themes, including questions on modern slavery mitigation. The appropriate question should be selected based on the nature of a specific contract and the relevant opportunity for positive impact.

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<sup>7</sup> Approximate annual spend on goods, services and capital works during the financial year 1 April 2022 to 31 March 2023.

Where we include a modern slavery question, potential suppliers will be asked to explain how they will identify and manage risks of modern slavery in the contract workforce and/or supply chain. Within their response to the tender, the suppliers must then demonstrate the action they will take to tackle modern slavery during the delivery of the contract. This then becomes a contractual obligation they must deliver and report on.

In compliance with PPN 06/20, social value is given at least a 10% weighting of the overall score used to evaluate procurements and select suppliers.

## **Tackling modern slavery in the procurement lifecycle (PPN 02/23)**

**[PPN 02/23](#) provides updated guidance on how public sector organisations can tackle modern slavery in supply chains. Aligned with our approach to follow best practice, we have carried out work to implement the actions recommended in this guidance.**

Some of the changes we have made to our procurement process in response to PPN 02/23 are:

- Carrying out modern slavery risk assessments for new procurements.
- Asking suppliers at least one social value question on modern slavery when they bid for procurements over £50,000 identified as high risk for modern slavery.
- Asking suppliers additional questions relevant to risks common within particular industries or commodities (for example, if we procure clothing, we may ask the supplier to provide evidence of policies about the minimum age of their workers).
- Asking high-risk suppliers over a certain value threshold to detail their Tier 1 supply chain members and declare that none of them are guilty of modern slavery offences.

The approach taken at each stage of the procurement lifecycle will always endeavour to be proportionate and not impose any unnecessary burdens that would deter a wide range of suppliers.

To aid with the risk assessments carried out before a procurement, we have developed a modern slavery risk assessment tool. This will support commercial staff to identify the key modern slavery risks within upcoming procurements and decide on relevant questions to ask potential suppliers about their modern slavery risks.

The tool asks commercial staff to input information about the following risk characteristics (in accordance with the risk assessment proposed by [PPN 02/23](#)):

<b>Risk Characteristic</b>	<b>Explanation</b>
Sector	The sector in which the business operates
Nature of Workforce	Risks to workers, such as physically demanding work
Location	Typical supplier location
Context	Context-dependent risks, such as inadequate labour laws
Commodity	Type of commodity
Business/Supply Chain Model	Issues arising from the typical business model, such as complex supply chains and subcontracting

Based on the information inputted, the tool assesses whether a procurement is low or high risk for modern slavery and proposes a set of questions for suppliers, to be included in the procurement process. The tool also indicates countries for which a particular commodity is high risk.

This tool will help mitigate the risk of Parliament buying goods or services affected by modern slavery and will support conversations with suppliers about how to manage modern slavery risks in their business.

Over the next financial year, the tool will be further developed and updated based on user testing and feedback. We will report on the uptake and use of the tool in the 2023-24 statement.

# 2. Policies in Relation to Modern Slavery

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## In focus

### Modern Slavery and Human Trafficking Policy

In 2021, we developed and implemented a [Modern Slavery and Human Trafficking Policy](#). The policy outlines Parliament's stance against modern slavery, human trafficking and all forms of corruption and bribery associated with these criminal acts. It also provides a framework to support the mitigation of modern slavery risk within Parliament and our supply chains.

We are committed to annually reviewing the policy to ensure Parliament's approach continues to follow best practice. We most recently reviewed and updated the policy in early 2023. In the latest version of the policy, we have removed zero tolerance language in order to prevent any incidents of modern slavery potentially being hidden by suppliers due to fears we may stop buying from them. Instead, the policy now emphasises the proactive approach Parliament takes in identifying and responding to incidents of modern slavery wherever they emerge. This enforces our commitment to supporting our suppliers to remediate any incidents of modern slavery that may arise, with termination of a supplier relationship being a last resort where they are either complicit or unwilling to make improvements.

Additionally, the policy now provides clear guidance for incidents with a high level of threat or risk of harm. It now states that individuals must always contact the emergency services in the first instance in order to ensure that victims of modern slavery can be appropriately safeguarded.

## Other relevant policies and guidance

Parliament has several other policies that aim to foster a culture that is more resilient to criminal activity such as modern slavery. They have been briefly explained below, but for a more in-depth account please see our [Modern Slavery Statement 2020/21](#).

### Sustainable Procurement Policy

The UK Parliament recognises its purchasing power and the impact our own purchasing practices can have on the conditions of workers in supply chains. We have a [Sustainable Procurement Policy](#) in place to foster a supply chain that supports its workers and acts in a way that is beneficial to their welfare.

## **Behaviour Code**

The UK Parliament [Behaviour Code](#) outlines clear guidelines on how people should be treated, and states that bullying, harassment and sexual misconduct will not be tolerated. The Behaviour Code applies to everyone who visits and works for Parliament.

## **Whistleblowing policies**

At the UK Parliament, malpractice and impropriety are treated very seriously. As such, both Houses have policies for employees to disclose malpractice or impropriety for instances such as criminal activity, abuse of office or a miscarriage of justice.

## **Safeguarding Policy**

There is a [Safeguarding Policy](#) in place to ensure children, young people and vulnerable adults are provided with a safe environment when on the Parliamentary Estate or when engaging with our staff in the wider community.

# 3. Risk Assessment

## Parliament's high-risk areas

In the 2021/22 financial year, Parliament re-examined the risk levels of all our suppliers. Our risk assessment is based on data from the Home Office, Cabinet Office, the Gangmasters & Labour Abuse Authority (GLAA), industry experts and global reports. We identified the below as Parliament's highest risk sectors, particularly where we outsource these functions:

- Catering and food processing (including food & drink)
- Clothing and textiles
- Construction
- Facilities management
- Health and social care
- Logistics
- Manufacturing and electronics
- Recruitment

In addition, we consider all contracts over £5 million to be high risk due to Parliament's larger stake in the supplier's operations. We note, however, that modern slavery risks may emerge in any procurement area, even those that appear to be low risk.

Below we detail why three of the above procurement areas are considered high-risk areas and explain what we are doing to mitigate these risks.

## Catering and food processing

Why does the GLAA consider this to be a high-risk industry? <sup>8</sup>		What is Parliament doing to mitigate these risks?
Non-payment of the minimum wage is common		Paying the London Living Wage to all staff working on the Parliamentary Estate, including contractors
Shift work and long hours may be required		Mandating rest breaks and following the law on setting maximum weekly working hours per person at 48 hours
Employers might provide workers accommodation within their workplace, sometimes instead of pay		Inviting food suppliers to complete the MSAT so we can have better visibility of their policies, procedures and supply chains

8 GLAA. [Industry Profiles - Food Service Industry - 2020](#) (accessed May 2023). GLAA. [Industry Profiles - Food Processing and Production - 2020](#) (accessed May 2023).

## Construction

Why does the GLAA consider this to be a high-risk industry? <sup>9</sup>		What is Parliament doing to mitigate these risks?
Exploitation in the UK construction industry is most frequently reported in London, where Parliament is based	➔	Paying the London Living Wage to all staff working on the Parliamentary Estate, including contractors
Irregular migrants and individuals who have difficulty communicating in English may be targeted	➔	Requiring all construction staff, including contractors, to have passed Right to Work checks
Potential lack of proper health and safety practices and training	➔	Carrying out health and safety checks during the procurement process to minimise the risk of a contractor engaging in unsafe or dangerous working practices

## Manufacturing and Electronics

Why has Electronics Watch identified this as a high-risk area? <sup>10</sup>		What is Parliament doing to mitigate these risks?
Forced labour is common	➔	Carrying out due diligence on certain electronics suppliers to investigate whether their supply chains contribute to human rights abuses
Rushed orders, use of subcontractors and cost-cutting may harm workers' rights	➔	Identifying electronics as a high-risk sector and starting to engage more closely with suppliers on these issues
The sector is reliant on rare metals such as tin, tungsten and gold, commonly found in countries with limited workers' rights	➔	Gaining visibility of the lower levels of our manufacturing and electronics supply chain through our suppliers' MSAT submissions and conversations with particularly high-risk suppliers

## Supplier mapping and risk assessment

### Modern Slavery Assessment Tool (MSAT)

The Modern Slavery Assessment Tool ([MSAT](#)) is a tool developed by the UK Government to help public sector organisations identify and respond to modern slavery risks in their supply chains. The MSAT requires suppliers to submit responses to a set of questions about their policies and procedures for tackling modern slavery. On completion, it provides suppliers with scores and practical recommendations on how they can fight modern slavery.

From 2022, all new supplier contracts included terms and conditions that required suppliers to complete the MSAT if requested by Parliament.

In our previous Modern Slavery Statement, we explained that we had a response rate of 46% in our previous MSAT campaign and outlined some of the issues we experienced in encouraging suppliers to complete the MSAT. This led us to refresh our approach and divide the suppliers we selected for the MSAT into three waves based on sector.

9 GLAA. [Industry Profiles - Construction - 2020](#) (accessed May 2023).

10 Electronics Watch. [Workers' Issues](#) (accessed May 2023).

## Parliament's three MSAT waves

Wave 1 (39 suppliers)	Wave 2 (22 suppliers)	Wave 3 (31 suppliers)
High value contracts (above £5 million)	Facilities management	Construction
Catering and food processing	Manufacturing and electronics	Logistics
Clothing and textiles		Health and social care
		Recruitment

This new approach has allowed us to target suppliers in smaller groups. As a result, we could closely engage them and improve our MSAT completion rate. We invited the first wave of suppliers to respond to the MSAT in February 2023, with a completion rate of 64% of Wave 1 suppliers by 31 March 2023. This meant 37% of all high-risk suppliers had completed the MSAT by the end of the financial year, with Waves 2 and 3 yet to be invited. Work is ongoing to increase this figure, including greater engagement with the suppliers contractually obliged to complete the MSAT.

In 2023, we invited the first wave of our identified high-risk suppliers to complete the MSAT. Analysis of the results of these suppliers' MSAT submissions has allowed us to:

- Identify trends in strengths and areas for improvement among suppliers.
- Gain a better understanding of our suppliers' visibility over their supply chains.
- Note where we can provide tailored support to individual suppliers where needed.
- Begin to monitor implementation of the recommendations provided by the MSAT over time.

Out of the suppliers who submitted a response, we have found that:

- All suppliers required to produce a modern slavery statement did so within the timeframe required by law.
- Most suppliers not required to produce a modern slavery statement chose to publish one anyway.
- Most suppliers reported on all six areas recommended for inclusion in their statement.
- The main area of weakness in the suppliers' statements is the lack of KPIs used to measure progress in tackling modern slavery, which were not reported by one third of suppliers.
- No supplier identified a single case of modern slavery within their organisation or supply chain within the preceding twelve months.
- All suppliers have mapped at least the first tier of their supply chain, while a minority have mapped the second tier and none have mapped the third tier or beyond.

- Most suppliers publish at least one policy relevant to modern slavery, while a small number hold these policies privately and about one in 10 do not have a relevant policy.
- Small and medium enterprises (SMEs) scored an average of 41.5% on the MSAT compared to an average of 76% for larger companies, likely due to having fewer resources.

The strength of the responses received demonstrates an increasing focus on modern slavery mitigation across these sectors. However, our analysis of MSAT submissions has flagged the following as areas for Parliament to focus on in the next year:

- Encouraging our suppliers to include relevant KPIs in their modern slavery statements.
- Ensuring suppliers are aware that we value honesty and transparency about incidents of modern slavery, which they should always disclose to us without fear of repercussions.
- Encouraging suppliers to publish policies relevant to modern slavery.
- Supporting SMEs to improve their performance on the MSAT by putting in place relevant measures to limit their modern slavery risks.
- Acknowledging we may uncover further areas for engagement upon completion of the second and third MSAT waves.

We have developed some key performance indicators (KPIs) which will help us to track our progress in this area:

### **Key Performance Indicators**

Percentage of contracts of high-risk & high value where the supplier has completed the MSAT

Total number of suppliers/contractors communicated with regarding modern slavery activity

# 4. Due Diligence Processes

## Escalation and remediation procedure

Parliament identified the need for a formalised process for responding to concerns of modern slavery within our workforce and supply chain. We have therefore developed an escalation and remediation process with support from a range of internal stakeholders and the advice of experts in the Parliamentary Advisory Group on Modern Slavery, Slave Free Alliance and the Metropolitan Police.

### Escalation

Escalation is the process of ensuring that concerns of modern slavery are reported through the correct channels. The overview of the process (right) outlines the steps that will be taken if there is an incident of modern slavery either in our supply chain or on the Parliamentary Estate.

The process focuses on balancing the needs of supporting victims and ensuring perpetrators are identified and punished appropriately in order to ensure a fair and just outcome for all.

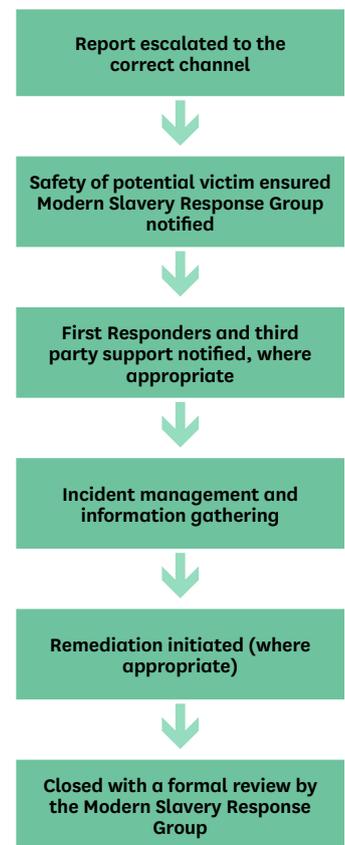
We intend to continuously develop the process over time, taking account of new knowledge and changing practices.

### Modern Slavery Response Group

Our response to any incidents will be managed by our Modern Slavery Response Group. The Modern Slavery Response Group is a group of staff appointed to respond to modern slavery incidents in Parliament and our supply chain.

The group provides a framework for accountability to appropriately manage any potential modern slavery cases. It is made up of key internal stakeholders in safeguarding, security, communications, human resources, legal, finance, procurement and sustainability, with representatives from across the Commons, Lords and PDS.

The group supported the development of the process. In the past year we have run interactive workshops to test the process, using example incidents to determine the effectiveness of the process, any identified shortfalls and any identified areas for development. Using the group's knowledge of their specific business areas, we were able to refine the process to ensure it suited our organisational context.



The group then received formal training, delivered by Slave Free Alliance, on how to respond to modern slavery incidents. See the [Escalation and remediation training](#) section for more detail. We aim to develop the role of the Modern Slavery Response Group over the coming years to improve their skills in modern slavery incident response.

## Remediation

**Remediation for modern slavery and exploitation refers to the process of finding a solution for an adverse human rights impact and then ensuring practical outcomes that can counteract or make good on the impact.**

Remediation can take many forms and will depend on the incident and the individual affected. For this reason, we developed the following principles, which Parliament commits to acting in line with if a modern slavery incident occurs:

- We will take a victim-centred approach to protect any victims of modern slavery from further harm or greater vulnerability.
- We will treat remediation for each victim on a case-by-case basis, acknowledging that sometimes it will entail multiple avenues of remediation.
- We will aim to work closely and collaboratively with suppliers to help eliminate exploitation, improve standards, support those affected and remediate victims.
- Business termination with a supplier will be a last course of action and will only take place if deemed absolutely necessary.
- We will seek to build on the expertise and advice of external and internal partners.
- We are committed to continuous learning and will review and adapt our approach to incorporate lessons learnt. We will evaluate our approach after each individual case to help improve our future response.

For supply chain incidents that require remediation, we will strongly encourage our suppliers to act in accordance with Parliament's Remediation Principles and will insist on a victim-centred approach.

## Lessons learnt

At Parliament we understand that information sharing and transparency are vital in the fight against modern slavery. Therefore, we will reflect on the lessons we have learnt in the previous year of the Modern Slavery Programme.

### Electronics procurement

**In the past year, we have classified electronics hardware as a high-risk procurement area for Parliament.**

This is due to worker violations that occurred in China, affecting global electronics supply chains and was widely reported in the press. We have initiated work to assess whether any of these incidents have affected Parliament's electronics supply chain. This proved challenging due to the complexity of electronics supply and limited visibility in the lower tiers of the supply chain. However, Parliament takes a precautionary approach to exploitative incidents and will not rule out the possibility of goods produced using exploitative practices being in our supply chain. We have engaged with some of our electronics suppliers to outline our concerns and to discuss collaborating more closely in this area moving forward.

We have also started to engage with Electronics Watch and are investigating the possibility of affiliating with them in the future.

### Procurement of gloves

**In November 2021, we were alerted to the fact that some of the disposable gloves on the Parliamentary Estate were linked to Supermax Glove Manufacturing, a company accused of using forced labour in its factories. The UK Parliament purchased gloves from a Tier 1 supplier who had been procuring Supermax gloves.**

Though the supplier initially assured us that the gloves we sourced did not come from the site identified, we took the incident extremely seriously. At Parliament, if we become aware of any allegations against any organisation in our supply chain, we will always take appropriate action.

We believe in an approach of working proactively and collaboratively with suppliers to remediate forced labour and supporting them in eliminating it. Since the incident, we have requested that further orders from Supermax are paused while remediation takes place and audits are carried out. For more information on the incident, please refer to our [Modern Slavery Statement 2021/2022](#).

Over the past year, we have had regular review meetings with the relevant contract manager as well as meetings with representatives from the organisation to monitor progress on Supermax's remediation commitments. At present we are purchasing gloves through alternative suppliers. We continue to monitor the situation closely and will resume purchasing from the supplier who provided the Supermax products only when we feel confident that all identified issues have been fully rectified.

# 5. Training and Awareness

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## Training

As of 31 March 2023, we have trained a total of 260 staff members on modern slavery through our various training offerings. Of these, 100 received only contract manager training, 150 received only non-commercial training and 10 received both types of training. After every training session we asked for participant feedback to aid with measuring the impact of the training and allow us to make regular improvements where required.

### Mandatory Annual Essentials training

**Introductory modern slavery training is now mandatory for all House of Commons and PDS staff through Parliament's annual 'Essentials' training. This is a mandatory e-learning module that all House of Commons and PDS staff must complete, first on joining Parliament and then repeated on an annual basis. This training includes informative content on spotting the signs of modern slavery and escalating concerns of modern slavery to the correct place.**

The inclusion of a modern slavery module into mandatory training means that we are now able to ensure the majority of our staff understand what modern slavery means and how to spot the signs, right from the point they join Parliament. In addition, the annual retraining of staff supports knowledge retention and ongoing awareness.

Mandatory modern slavery training will also be introduced for all House of Lords colleagues in the next year.

### Contract manager training

**In October 2021, we rolled out specialised modern slavery training for contract managers. It emphasises the role of contract managers in carrying out appropriate due diligence and preventing exploitation within Parliament's supply chain. The 90-minute interactive workshop aims to help contract managers understand what modern slavery is and how they can support Parliament's Modern Slavery Programme through their work in responsibly sourcing goods and services.**

As of 31 March 2023, we had trained 110 contract managers through nine training sessions. However, due to changes in our contract manager workforce over the past year, a number of these no longer have contract management roles at Parliament. Therefore, we have trained 69 (24%) of our current 283 contract managers. This is below target. In the next year, we will be working with our commercial team to increase this figure to 60%.

Of those who have attended the sessions and completed the feedback survey, 100% agreed the training increased their understanding of the topic. The average score given by participants for the training was 4.9 out of 5.

We plan to continue running these training sessions throughout 2023/24 and monitor progress against the following KPI:

#### **Key Performance Indicator**

Percentage of contract managers who received bespoke commercial training on modern slavery

## **All-staff sessions**

**Our all-staff training sessions continued for the second year. The 45-minute interactive workshop aims to help staff understand what modern slavery is and how they can help prevent modern slavery in Parliament by spotting the signs and reporting concerns.**

As of 31 March 2023, we have trained a total of 160 staff members through non-commercial training sessions, including the estate-based staff and Modern Slavery Response Group members listed below. Aside from the Modern Slavery Response Group members, staff members put themselves forward for this training voluntarily and come from teams across Parliament.

We plan to continue running this training throughout 2023/24, with the aim of delivering training to a minimum of 300 members of staff by 2024. We have developed a KPI to track our performance in this area:

#### **Key Performance Indicator**

Number of all-staff participants to receive training on modern slavery

## **Estate-based staff training**

**We trialled a new in-person training focused on our estate-based staff as part of our commemoration of Anti-Slavery Day 2022. Estate-based staff are those who are active on the Parliamentary Estate daily, including security, catering and cleaning staff. They may be better placed to identify potential incidents of modern slavery occurring than desk-based staff. We therefore targeted them specifically for training on spotting the signs of modern slavery and how to report any concerns.**

Of the 14 staff members who attended the trial sessions and completed the feedback survey, 100% agreed the training increased their understanding of the topic. The average score given by participants for the training was 4.8 out of 5. We aim to engage more estate-based staff on modern slavery on Anti-Slavery Day 2023.

## Escalation and remediation training

**As part of the development of our escalation and remediation procedure, Parliament worked with Slave Free Alliance to develop and deliver specialist training to our Modern Slavery Response Group, whose role we describe in the [Partnerships](#) section.**

The training took the form of a one-hour introductory session to modern slavery, and a two-hour advanced session on how to assess reports of potential modern slavery and take the appropriate steps to respond in line with our escalation process.

We also developed a short training video accompanied by written exercises to complete. This is to ensure we have a permanent resource for training refreshers and for upskilling new group members.

We launched this training towards the end of the financial year and had delivered it to 15 of the 18 members of our Modern Slavery Response Group by the end of March 2023.

## Future plans

**As well as continuing to deliver all training offerings detailed above, Parliament's Modern Slavery Programme aims to review our current training offerings and launch the following types of training in 2023/24:**

**Further roll out of contract manager training:** Training contract managers to carry out more advanced modern slavery due diligence will further mitigate risks to Parliament. We will be working with the commercial team to increase the total number of contract managers who have received modern slavery training. Our target is to reach 60% by March 2024.

**Leadership training:** Leadership and senior staff can contribute to modern slavery prevention by offering top-down guidance and support. We will explore the idea of providing specialised training on modern slavery issues to aid them in supporting both Houses to prevent modern slavery in Parliament's supply chains.

**Mandatory House of Lords training:** We will roll out mandatory modern slavery training for all House of Lords colleagues during the next year, including an annual e-learning module.

## Awareness raising

**Raising awareness of our Modern Slavery Programme is an important part of our work. As part of our public-facing communications, information on Parliament's Modern Slavery Programme is displayed prominently on the [UK Parliament website](#).**

We have continued to work with the Communications Teams in both Houses to raise awareness of modern slavery both in our workforce and supply chain. Below we describe our main awareness raising activities from the past year.

### Anti-Slavery Day 2022

The UK Parliament commemorated Anti-Slavery Day 2022 by raising awareness of the issues of modern slavery and human trafficking. This included setting up an information stall in the centre of the Parliamentary Estate and providing information on modern slavery in internal newsletters. During the week of Anti-Slavery Day, we also conducted in-person training sessions on how to spot the signs of modern slavery. Finally, the All-Party Parliamentary Group (APPG) on Human Trafficking and Modern Slavery hosted the Anti-Slavery Day Awards.

### Supplier engagement

**As described in the [Risk Assessment](#) section, we have worked closely with our high-risk suppliers to request that they provide us with information on how they limit modern slavery risks.**

We have also kept our suppliers informed about Parliament's social sustainability work. We sent a supplier bulletin on social sustainability issues to high-risk suppliers and all other suppliers with contracts within Parliament's Strategic Estates department. This bulletin included information on how Parliament is working to tackle the issue of modern slavery, emphasised our desire to work in partnership with our suppliers and set out the support available from our team.

We monitor our progress on supplier engagement by using the following KPI, with the aim of reaching more suppliers year on year:

#### **Key Performance Indicator**

Total number of suppliers/contractors communicated with regarding modern slavery activity

# 6. KPIs and Effectiveness

This section details the development of our Key Performance Indicator framework to track our progress on anti-slavery work. It also provides a status update on the goals set out in our previous [Modern Slavery Statement](#) and looks ahead to the next steps for 2023/24.

## KPIs

### Development of KPIs

Parliament developed a KPI framework in March 2022 and this is the first reporting year throughout which we have monitored our progress against the KPIs. We acknowledge that we may need to review and improve the framework as the Modern Slavery Programme further matures.

We designed the KPIs below to track our progress from 2022 to 2024. We are pleased to have demonstrated improvements on most KPIs compared to 2021/22. This year, we have developed an additional KPI on our high-risk suppliers' compliance with Section 54 of the Modern Slavery Act 2015.

### KPI framework

Key Performance Indicator	Progress	Score
1. Percentage of contracts of high-risk & high value where the supplier has completed the Modern Slavery Assessment Tool (MSAT)		37%
2. Percentage of contract managers who received bespoke commercial training on modern slavery	 †	24%
3. Number of all-staff participants to receive awareness raising training on modern slavery		160
4. Total number of suppliers/contractors communicated with regarding modern slavery activity		159
5. Percentage of high-risk suppliers publishing a modern slavery statement compliant with Section 54 of the Modern Slavery Act		100%

**Progress Key:**  Below target  Progressing  On target

We now transparently report the number of modern slavery incidents we identify each year. We see the identification of incidents as a positive step towards correcting the rights abuses that exist in all supply chains.

	2021/22	2022/23
<b>Modern Slavery Incidents Identified</b>	1	0

† While we have continued to train contract managers, the percentage of contract managers who have received training on modern slavery has fallen due to our changing contract manager workforce.

# Goals

## Next steps for 2023/24

In 2023/24, our strategic focus will be building upon the positive progress we have made since the launch of the Modern Slavery Programme and embedding modern slavery prevention as part of business as usual at Parliament.

## Capacity Building Goals

We will continue to build capability across the organisation so that staff and contractors understand what steps they should be taking to prevent modern slavery in our supply chains. To achieve this, in 2023/24 we will:

### GOAL 1:

Roll out new training offerings for colleagues across the organisation, based on the findings of our upcoming training review. This will include a focus on increasing contract manager training attendance

### GOAL 2:

Commemorate Anti-Slavery Day across Parliament, including awareness-raising communications and engagement activity with colleagues at all levels

### GOAL 3:

Fully implement our modern slavery escalation and remediation procedure and build staff awareness of it

## Risk Identification and Due Diligence Goals

We will build on our risk identification and due diligence measures. To achieve this, in 2023/24 we will:

### GOAL 4:

Invite all remaining high-risk suppliers to complete the MSAT

### GOAL 5:

Analyse MSAT results and use them to help develop a supplier engagement approach

### GOAL 6:

Increase partnership work with public bodies and groups of experts to share knowledge and best practices

### GOAL 7:

Embed the procurement risk assessment tool as part of business as usual across the procurement lifecycle

### GOAL 8:

Continue to engage with our acutely high-risk suppliers and support them to improve their anti-slavery practices

### GOAL 9:

Gather lessons learned and transparently report emerging risks, any incidents of modern slavery that may be identified and steps taken to remediate

### GOAL 10:

Continuously develop our Modern Slavery Programme by drawing on the latest research and evidence on modern slavery issues

## Sign off

This statement has been approved by the House of Commons Executive Board and the House of Lords Management Board. This statement was approved in July 2023, for the financial year ending 31 March 2023.



**Signed by Dr John Benger,**  
the Clerk of the House of Commons,  
for the House of Commons Administration

A handwritten signature in black ink that reads "John Benger".



**Signed by Simon Burton,**  
the Clerk of the Parliaments,  
for the House of Lords Administration

A handwritten signature in black ink that reads "S. P. Burton".