



HM Government

# UK GOVERNMENT **MODERN SL****VERY** STATEMENT

1 April 2021 – 31 March 2022



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# EXECUTIVE SUMMARY

The UK Government alone spent around £259bn<sup>1</sup> in the Financial Year 21/22 and so we have a duty to make sure that money is spent responsibly. Since the government first published a Modern Slavery Statement in 2020, action across government departments has been taken to ensure modern slavery risks in our supply chains are identified and addressed.

This statement covers the actions the UK Government has taken to address modern slavery in our operations and supply chains from 1 April 2021 to 31 March 2022. The term “Modern Slavery” is used throughout this document. It is an umbrella term that covers human trafficking, slavery, servitude and forced labour.

We have taken the decision to move back to one high-level government statement, as was the case in 2019/20. This will allow us to provide information on the activity taken across government in one place, making it easier for the reader and reducing duplication across individual departmental statements. We will continue to monitor and improve how the government reports on the action taken in tackling modern slavery in public supply chains. We remain committed to the highest levels of transparency and in leading the way for tackling modern slavery in supply chains.

## Improving and embedding our policies:

During 2021 to 2022 we launched Procurement Policy Note (PPN) 04/21, which focused on Applying Exclusions in Public Procurement, Managing Conflicts of Interest and Whistleblowing. It provides guidance with support commercial staff when looking to apply exclusion grounds. We also launched PPN 08/21: Taking account of a bidder's approach to payment in the procurement of major government contracts. This PPN addresses prompt payment issues and ensures that any of our high

value contract bidders have ethical payment practices in place.

We also continued to embed PPNs 05/19, which gives full guidance on Tackling Modern Slavery in Government Supply Chains and 06/20, which helps commercial professionals take account of social value in the award of central government contracts.

We recognised that with our departure from the EU we needed to simplify our Procurement Practices, which required primary legislation. To this end, we introduced the Procurement Bill in 2022 and updated PPN 05/19 in the 22/23 financial year. More information on all these PPNs and procurement reform can be found in Section 2.

## Working with International Partners:

In October 2021 we secured an agreement at the G7 Trade Ministers' Meeting to eradicate the use of all forms of forced labour from global supply chains. We have also collaborated with the Global Fund to End Modern Slavery to help reduce knowledge gaps on modern slavery in key sectors, with over 19,000 individuals benefiting from engagement with the programme.

We have also continued to fund projects internationally through the Modern Slavery Innovation Fund (MSIF). In 2021-2022 the MSIF funded a Migrant Resource Centre in Mauritius, which provided support to over 2,196 migrant workers. It also funded a free interactive “Just Good Work” app.

## Tools, training, and networks:

We have continued to use the tools we have developed to help us apply due diligence practices to our procurements. In line with PPN 05/19, departments must take a risk-based approach to examining modern slavery in their supply chains. We have developed a modern slavery risk prioritisation tool to help commercial staff identify high, medium, low and very low risk

<sup>1</sup> Figures taken from Public Expenditure Statistical Analyses 2022 (HM Treasury), Table 6.5

contracts. Those suppliers who are identified as having a high or medium risk can then be invited to complete the Modern Slavery Assessment Tool (MSAT). More information on the tools commercial teams use can be found in section 3.

In terms of training, commercial staff involved in working with contracts or suppliers are advised to complete Chartered Institute of Procurement and Supply ethical procurement training and they are also

encouraged to complete the government Tackling Modern Slavery in Supply Chains e-learning. This is explained further in section 4.

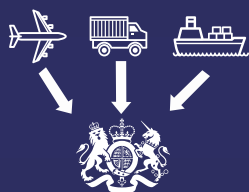
In addition, the Home Office continues to run the Commercial Director level Modern Slavery Advocates group and its underpinning working group to ensure learning and best practice is shared across government.

# SECTION I: Organisation structure and supply chain

This section highlights the size and diversity of government's supply base, explaining why it is important that our action is targeted.



**£259bn spent annually  
by central government  
on goods, services and  
capital goods**



**10,000 direct  
suppliers to  
government**



There are 24 ministerial departments in UK Government. In the Financial Year 21/22, Central Government spent £195.7bn<sup>1</sup> on goods and services and invested another £63.3bn in procurement of capital goods<sup>2</sup>, covering the supply of anything from uniforms to military equipment.

Government buys these goods and services from thousands of suppliers, from small businesses to large multinationals. In the Financial Year 20/21, 26.9% of spend was with small and medium enterprises<sup>3</sup>.

There were 40 strategic suppliers to government in the Financial Year 21/22 and the Cabinet Office estimates Central Government direct spend on strategic suppliers to be around £21bn annually. We work particularly closely with strategic suppliers to ensure the highest standard in their supply chains and operations, and consequently, in the supply of the critical goods and services on which the UK relies.

In 2021/22, public sector organisations (including public authorities outside of central government) spent over £23.2bn through CCS' commercial agreements.

There were over 10,000 direct suppliers to government in 2021 to 2022. Many of these suppliers have complex, global supply chains with multiple sub-contractors making it difficult to have complete visibility. Departments are required to take a risk-based approach to managing modern slavery in their supply chains, to ensure effort and resources are targeted to the areas of greatest potential risk.

The government's greatest strength in protecting public spend from modern slavery is the over 4,500 civil servants within the [Government Commercial Function](#) (GCF) working in commercial roles across government. These civil servants act as the gateway to accessing government contracts. They carry out due diligence on our suppliers and their supply chains throughout the commercial

<sup>1</sup> Figures taken from Public Expenditure Statistical Analyses 2022 (HM Treasury), Table 6.5

<sup>2</sup> Figure taken from Public Expenditure Statistical Analyses 2022 (HM Treasury), Table 6.5

<sup>3</sup> Figure taken from Transparency Notice: Central government direct and indirect spend with SMEs, 2020 to 2021



life cycle where there is found to be a risk of modern slavery. Further detail on the specialist training they receive to identify and address modern slavery risks in public procurement can found in Section 4.

Background information on what role [departments, agencies and public bodies](#) take within government as well as their [workforce](#)

[management](#) and [annual reports and accounts](#) for the 2021 to 2022 financial year can be found through these links.

Following changes announced in February 2023, some departments no longer exist or have changed their names or scope. Read about [recent government updates](#).

## SECTION II: Policies in relation to modern slavery

This section covers the government's policies to prevent modern slavery in our operations and supply chains.

The Cabinet Office has responsibility for setting the government's commercial policy and standards, which define how all central government bodies should conduct their commercial activities. These standards are set out in the [GCF Standards](#) and in [Procurement Policy Notes \(PPNs\)](#), which government departments are obligated to apply in accordance with the instructions of each individual PPN.

### Supplier Code of Conduct

The Supplier Code of Conduct is the foundation of all of our commercial relationships and details the behaviours that government buyers and suppliers can expect of each other, including specific provisions on human rights and employment law.

There is a separate Code of Conduct for Grant Recipients that requires them to comply with all applicable human rights and employment laws in the jurisdictions in which they work. They must also have robust means of ensuring that the subcontractors in their supply chains comply.

### PPN 05/19: Tackling Modern Slavery in Government Supply Chains

Since September 2019, central government contracting authorities have been following PPN 05/19 and the detailed guidance to identify and manage risks of modern slavery relevant to their commercial activities. This was developed in collaboration with Non-Governmental Organisations and academics and was consistent with shared best practice in the private sector.

The guidance takes a risk-based and proportionate approach to managing the risk of modern slavery. Unlike other commercial policies, modern slavery measures are not linked to a financial threshold. Modern slavery can affect virtually any industry and economic sector, and contracts of any value. Instead, there are several core characteristics

that place workers at heightened risk of being exploited. As part of the risk-based approach, commercial teams are required to assess new procurements for risk of modern slavery using these core characteristics. They include industry type, supplier location, commodity type, nature of the workforce, context in which the supplier operates and business/supply chain model.

Commercial teams are required to design new procurements to take account of the modern slavery risks they have identified. This touches on all aspects of the procurement (market engagement, specification, tender questions and evaluation, contract conditions) and beyond (contract management, right of audit). The guidance contains a variety of tools and templates to help commercial teams conduct a procurement, including a planning checklist and process chart, example evaluation questions, case studies and contract conditions.

In February 2023, PPN 05/19 was replaced by new policy and guidance under PPN 02/23.

### PPN 04/21: Applying Exclusions in Public Procurement, Managing Conflicts of Interest and Whistleblowing

PPN 04/21 provides guidance with the relevant information, advice and direction to support activities relating to the application of exclusion grounds under the Public Contracts Regulations 2015 (PCRs). The PCRs include a number of exclusion grounds that are relevant to modern slavery issues. These include mandatory exclusion grounds for offences of modern slavery and discretionary exclusion grounds for professional misconduct and violations of social or labour law obligations.

PPN 05/19 includes guidance on applying exclusion grounds in instances of modern slavery and can be applied in conjunction

with PPN 04/21 to assist contracting authorities in their exclusion activities.

### **PPN 06/20: Taking account of social value in the award of central government contracts**

Government is continuing to deliver social value through its commercial activities and incentivising businesses to become more responsible and sustainable. The Cabinet Office developed [PPN 06/20](#) (Taking Account of Social Value in the Award of Central Government Contracts) which provides guidance on how to take account of the additional social benefits that can be achieved in the delivery of contracts.

Whilst a supplier can achieve social value in a number of ways, modern slavery is specifically included in the social value model, and, where appropriate bidders to government contracts can score higher in this field if they are able to demonstrate the positive action they have taken to address modern slavery. As social value has a minimum weighting of 10% of the total score in most new central government procurements, prospective suppliers now need to demonstrate the additional social value provided if they are to win government contracts.

Once a supplier has been awarded a contract, departments will include social value commitments in the contract and management of it to monitor delivery.

### **PPN 08/21: Taking account of a bidder's approach to payment in the procurement of major government contracts**

We recognise the effect that late payments can have on the working and employment conditions of workers throughout the supply chain. We want to make sure our suppliers are paid promptly, and our suppliers do the same. Therefore, departments have committed to the implementation of responsible purchasing practices across their commercial portfolio, and have embedded prompt payment practices across the procurement life cycle in line with [PPN 08/21](#) (Taking

account of a bidder's approach to payment in the procurement of major government contracts). Any organisation that bids for a central government contract in excess of £5m a year will need to demonstrate it has effective payment systems in place to ensure a reliable supply chain. The Procurement Bill strengthens this further and implies 30-day payment terms into every public subcontract throughout the supply chain. Further data on departments' [prompt payments](#) can be found here.

## **Transforming Public Procurement**

The Cabinet Office currently has a new Procurement Bill before Parliament that will strengthen the grounds for exclusion in relation to modern slavery. The mandatory grounds for exclusion will be expanded for serious labour offences, with new grounds including failure to pay the national minimum wage and offences relating to employment agencies. These are based on the serious labour offences within the purview of the Director for Labour Market Enforcement.

We recognise that modern slavery often occurs in countries which are not party to international treaties on forced labour, and which are unlikely to prosecute the perpetrators. For this reason, the Procurement Bill has introduced explicit provisions for a new discretionary exclusion ground that does not require a conviction to disregard bids from suppliers which are known to use forced labour or perpetuate modern slavery.

In addition, we expect the highest standards of labour practices from our suppliers, and we work with them using the Modern Slavery Assessment Tool (MSAT) to examine work-force conditions in their supply chains (for more information on the MSAT, please review Section 3). We do this on a risk prioritisation basis to ensure our efforts are directed to areas of greatest risk. Commercial staff across government are provided with guidance on what to do and how to remedy the situation if they find poor labour practices.



The Bill is clear that contracting authorities will be able to apply the grounds for exclusion to supply chains and must apply them to sub-contractors they are relying on to meet conditions of participation.

## **Working with international partners**

The UK Government continues to provide international leadership to end modern slavery and human trafficking. In October 2021 the Department for International Trade (DIT—as was then) led work to secure an agreement at the G7 Trade Ministers' Meeting to eradicate the use of all forms of forced labour from global supply chains. They also collaborated with the Global Fund to End Modern Slavery to support Sustainable Development Goal (SDG) 8.7—eradicating forced labour, ending modern slavery and human trafficking and eliminating the worst forms of child labour. This programme has helped reduce knowledge gaps on modern slavery in key sectors, with over 19,000 individuals benefitting from engagement with the programme.

In addition, the Foreign, Commonwealth and Development Office (FCDO) has provided funding to a range of multilateral partners, including the [Office of the Special Representative and Co-ordinator for Combatting Trafficking in Human Beings \(CTHB\)](#). This funding was used to conduct research on the role of technology in modern slavery and published a paper on the topic in March 2022 [Policy responses to technology-facilitated trafficking in human beings](#). The paper provides an analysis of the approach to policy and legislation across participating member States of the Organization for Security and Co-operation in Europe (OSCE). The FCDO also supported the production of an E-Learning module on the Prevention of Trafficking in Human Beings in Supply Chains, with the objective of supporting States to implement the most effective processes and policies to identify and address modern slavery risks.

The UK Home Office continued to fund projects internationally through the Modern Slavery Innovation Fund, a subset of the

wider Modern Slavery Fund. The Innovation Fund sought to prevent forced labour in global supply chains and in 2021-2022 funded a Migrant Resource Centre in Mauritius. This Centre provided support to over 2,196 migrant workers facing employment grievances. It also funded a free interactive “Just Good Work” app which has been downloaded by migrant workers from Bangladesh, Mauritius, Malaysia and Madagascar. The app gives jobseekers and workers critical information and advice on recruitment, employment and life in a new destination.

The UK has also prioritised the support of labour rights in its trade relationships. In the 21-22 reporting year, the UK signed Free Trade Agreements (FTAs) with Australia and New Zealand that included a labour chapter that will uphold high domestic protections for our workers, encourage good business practice and corporate responsibility, and advance our mutual ambition to tackle modern slavery and gender discrimination in employment. Additionally, the United Kingdom's current Generalised Scheme of Preferences (GSP) includes a range of grounds for possible variation or suspension of preferences, including conditions relating to human and labour rights.

## **Government workforce**

As an employer, the Civil Service ensures that its employees are not subject to any of the 11 International Labour Organisation's indicators of forced labour. You can read more about Civil Service employment terms and conditions here: [Civil Service Terms and Conditions of employment](#).

To prevent directly employed staff being put at risk of exploitation, a series of in-depth employment checks are undertaken. As a result of our rigorous pre-employment screening processes, as well as our safeguarding, complaints, and safe space policies, it is thought unlikely that any civil service staff could be subjected to exploitation because of modern slavery.



## SECTION III: Risk assessment and due diligence

This section describes the modern slavery due diligence undertaken, and how we are implementing and incentivising responsible business practices to protect workers in our supply chains across government.

Commercial staff across government use a Modern Slavery Risk Prioritisation Tool (MSRPT) to help risk assess new procurements and their existing contracts, in accordance with PPN 05/19. The MSRPT, developed by the Home Office, enables commercial staff to more easily understand which suppliers they need to invite to undertake a more in-depth and targeted assessment, using the [Modern Slavery Assessment Tool \(MSAT\)](#).

The MSAT is a free modern slavery risk identification and management tool for public bodies to use with their suppliers. More details on this tool can be found in the [UK Government Modern Slavery Statement 2020](#). The [question set](#) can also be downloaded.

Each department is responsible for carrying out their own risk assessments of their contracts and suppliers before deciding an appropriate plan for inviting suppliers to complete the MSAT. This will range from no intervention for those contracts identified as having little or no risk, to light touch regular meetings with contract managers for low to medium risk contracts. For contracts identified as having a high risk of having modern slavery in their supply chains, contract managers may put an action plan in place to drive improvement based on the results of the MSAT.

In 2021/22 central government departments identified 360 suppliers as having high or medium risk of modern slavery in their supply chains. For the whole of government (including partner organisations) we received 939 supplier responses to MSAT campaigns, of which 84% accepted their recommendations and completed their campaigns, which shows significant engagement and understanding of the need to tackle this issue by our suppliers.

Departments can use their discretion on how best to approach MSAT reviews. This ensures efforts and resources are targeted at contracts with the greatest risks. For example, the Department of Levelling Up, Housing and Communities, included an additional lower value contract (below £5m) for ICT hardware goods to gain assurance that it was outside of a USA import ban placed on goods made under the conditions of modern slavery or forced labour.

Some departments have developed additional tools and mechanisms, designed to support the identification of modern slavery risks specific to their procurements. For example, the Department for Business, Energy and Industrial Strategy (as was then) developed the Risk Assessment for Modern Slavery (RAMS) Tool<sup>1</sup>. The tool supports commercial leads to evaluate the inherent risk of modern slavery in procurements and contracts. Completion of the RAMS tool is mandatory for all new procurements valued greater than £1m. Further use of the tool is encouraged for procurements between £10,000 and £1m where there is a known risk of modern slavery in the supply chain.

### Government's strategic suppliers

All 40 of Government's strategic suppliers (in 2021/22) have completed the comprehensive MSAT. There has been an average increase of 10% in the scores achieved by strategic suppliers, which indicates that they have been undertaking work to reduce the risk of modern slavery in their supply chains.

There is a genuine desire on the part of suppliers to improve their scores even further and they are working with their Crown Representatives to identify further areas for

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<sup>1</sup>RAMS Tool is based on the Modern Slavery Risk Prioritisation Tool developed by the Home Office and adapted to work with BEIS' local processes.

improvement. Common themes for improvement include training and awareness and supply chain mapping.

In July 2021 the Cabinet Office hosted a Round Table in partnership with TechUK focussed on the IT sector. In December 2021, the Cabinet Office also hosted a Modern Slavery Round Table with a facilities management (FM) focus with the Business Services Association (BSA) and the Home Office. Additionally, the Cabinet Office has supported the BSA in the development of their toolkit, which supports FM, Construction and Infrastructure projects.

In addition to running roundtable events with our strategic suppliers the Cabinet Office's Markets, Sourcing and Suppliers Team has provided support to Government's strategic suppliers on specific initiatives to enhance their capabilities in raising awareness of modern slavery. This has included events focused on Anti Modern Slavery Day and the development of workforce training initiatives.

## Higher risk procurements

We recognise that some procurements are from sectors that will have higher risks of

modern slavery in their supply chains than others. These include but are not limited to IT, construction, textiles, facilities management, and healthcare. Whilst some of these tend to be the sectors in which Government spends the higher amounts in aggregate, modern slavery may be found in any contract in these sectors – regardless of the size of the supplier.

Cabinet Office figures show that the sector that received the most spend in 21/22 was Construction and Engineering, closely followed by Complex Outsourcing and IT. Crown Commercial Service, which manages key frameworks agreements present in these markets, uses Electronics Watch to monitor framework suppliers and the first level of subcontractors on the Technology Products and Associated Services agreement. This monitoring assists with managing modern slavery-related risk in our Government overseas technology hardware supply chains.

## SECTION IV: Training and Awareness Raising

This section describes the training we have delivered to our own procurement and commercial staff and suppliers to build their capability to identify and address modern slavery risks. We are focussing our training efforts on commercial staff because of their increasing responsibility to prevent modern slavery in government supply chains.

Increasing the skills and capability of our commercial staff and contract managers is fundamental to our ability to prevent modern slavery from occurring in our supply chains.

Training in the form of E-Learning is available to procurement staff across government. There is the "Tackling Modern Slavery in Supply Chains" E-Learning course launched by the Home Office which focuses on the practical steps staff can take throughout the commercial lifecycle to identify and mitigate modern slavery risks. The Home Office partnered with the Chartered Institute of Purchasing and Supply (CIPS) to provide "Ethical Procurement and Supply" training. Both courses can be accessed through the Government Commercial College (GCC), operated by the Government Commercial Function (GCF). We also encourage non-commercial staff that have a contract management function as part of their role to complete the E-Learning.

The Home Office has continued to convene both the cross-government director-level Anti-Slavery Advocates Network and the working level Modern Slavery and Procurement Implementation Group. These groups bring together procurement leads from across government to:

- ensure policies and tools are fit for purpose.
- build greater awareness of best practice in modern slavery due diligence at senior levels (for example, we have invited businesses and civil society experts to share insights and tips at these meetings); and
- co-ordinate activity and provide a forum for peer-to-peer learning (for example, discussing issues and sharing best practice).

### Supporting the wider public sector

Many government departments work with agencies and public bodies to deliver their priorities. For example, the Department for Education not only works with schools but also national and local agencies that look after children, professionals who work in schools and further and higher education institutions, local authorities and children's services and health services.

All these public sector organisations purchase goods and services in a myriad of ways. Some are responsible for their own purchasing; some buy within a purchasing consortium and others do no direct purchasing and rely on government departments or other organisations to buy their goods and services.

Where appropriate, government departments will work with their affiliated organisations to raise their awareness of modern slavery. For example, the Department for Digital, Culture, Media and Sport wanted to improve its Arm's Length Body (ALB) understanding of this topic. To do so, in the 2021/22 financial year, DCMS delivered a training session for all DCMS ALBs.



# SECTION V: Goals and Key Performance Indicators (KPIs)

This section provides information about the key performance indicators to which we have been working over the past year.

Goals are outcomes we, as a government, work towards and the Key Performance Indicators (KPIs) are used to understand and measure our progress towards achieving these goals. The goals that all departments aim to achieve are detailed here, along with examples of work we expect all departments to continue.

Given the range, scale, and nature of procurements across government, each department has continued to identify their own risks and set their own ambitious, but realistic, KPIs against which they have all made strong progress with some achieving or exceeding across the board. All goals and KPIs are broadly along the following themes:

Risk Assessment & Management

*Proactively monitor modern slavery risk in new procurements and contract management and have strategies in place to manage these risks.*

This can be achieved by continuing to assess risk of contracts and suppliers and ensure action plans are targeted.

This can be achieved by continuing to encourage staff to complete the E-Learning available.

Due Diligence and Processes

*Increase the knowledge, understanding and capabilities of our suppliers to address modern slavery risks.*

This can be achieved by inviting relevant suppliers to complete the Modern Slavery Assessment Tool (MSAT) and conducting follow up meetings to build a better understanding of the actions which should be taken to tackle modern slavery.

This can be achieved by reviewing policies and procedures to ensure compliance with the [PPN02/23](#) and associated guidance as well continuing collaboration through the Anti-Slavery Advocates forum and the Modern Slavery & Procurement Implementation Groups.

# Case Study 1: Malaysian rubber gloves – partnership in action

Last year's Home Office statement featured a case study on the procurement of Personal Protective Equipment (PPE) during the early stages of the COVID 19 pandemic. The majority of rubber gloves used by health services around the world are manufactured in Malaysia, where there have been credible and serious allegations of modern slavery in supply chains.

To understand the modern slavery risks and issues in the Malaysian rubber glove industry, we worked with; the Modern Slavery and Human Rights Policy and Evidence Centre (MS PEC); the Universities of Newcastle, Sussex and Nottingham; Impactt; UK government departments; and likeminded partners. They produced a key report which highlighted the worsening situation in Malaysia as a result of the COVID-19 pandemic.

To help us understand the problem, we established strong connections with the Malaysian High Commission in London. We held meetings with the Malaysian High Commissioner and facilitated a visit to the UK by the Malaysian Minister for Human Resources to understand the challenges on the ground and share the progress the UK has made in this area.

Working in close coordination with the British High Commission in Kuala Lumpur, we aimed to:

- Confirm that Malaysian labour laws and any new related legislation was in conformity with International Labour Organization (ILO) standards. Elements of which started with amendments to the Malaysian Employment Act that came into force in February last year.

- Support the Malaysian government on enforcement/ implementation of existing standards.
- Strengthen how HMG identified and mitigated modern slavery risks in its Malaysian rubber glove supply chains, including through audits.
- Strengthen HMG's relationship with the Malaysian rubber glove and electronics sector, academia and civil society to drive up labour standards and promote HMG's expectations around labour rights.

In parallel, the Responsible Business Alliance developed a collaborative initiative for those buyers and suppliers of Malaysian rubber gloves who were committed to improving employment standards in the industry.

Early indications were positive with some rubber glove importers and manufacturers having taken encouraging steps to improve their practices.

The Malaysian Government has also been responding to pressure. In December 2021 they launched their first 'National Action Plan on Forced Labour' (NAPFL), as well as signing the optional Geneva protocol on forced labour.

As the Malaysian government itself said, "There is still work to be done to address an issue that has been a major problem for Malaysian businesses and left many vulnerable people exploited. Over the past year we have seen both government and business in Malaysia taking the issue seriously, and we are confident that – including through support from the UK and other allies in this space – we are at the beginning of a process of real improvement."

## Case Study 2: Commonwealth Games

The Birmingham 2022 Organising Committee (OC) was an executive non-departmental public body, sponsored by the Department for Digital, Culture, Media & Sport (DCMS). It was responsible for the strategy and delivery of the 2022 Commonwealth Games, an international multi-sports event.

In February 2021, the OC developed and launched the Birmingham 2022 Sustainable Sourcing Code as part of their commitment to make Birmingham 2022 the most sustainable Games yet. The Code covered the social and environmental principles with which supply chain partners were expected to comply. The principles set out in the Code included sharing a commitment to uphold international human rights standards, including those that related to modern slavery. Ethical trading and anti-slavery activities were overseen by a Steering Group which included representatives from the Executive Management Team.

All persons working for the OC had to comply with their **Anti-Slavery and Human Trafficking Policy**. The Procurement Policy detailed the actions they took to combat modern slavery and human trafficking in supply chains and what they did to embed the mitigating controls in daily operations.

### Risk assessment and due diligence

The OC took active steps to establish that suppliers, consultants and contractors were not engaging in any form of modern slavery or human trafficking, tailoring their approach to the risks of the particular industry and supplier. In supply contracts and standard terms of business, they included express terms requiring counterparties to comply with modern slavery legislation. They required all suppliers to comply with the Modern Slavery Act and DCMS' Anti-Slavery and Human Trafficking Policy, to implement procedures for their own personnel as well as their suppliers to establish that there was no slavery or human trafficking in their supply chains, and to notify the OC if they identified

any alleged or actual instances of slavery or human trafficking. They also included provisions in their supply contracts which allowed them to inspect and conduct an audit of a supplier's and its sub-contractors' premises to monitor compliance with anti-slavery and human trafficking laws.

For **UK-based service suppliers**, a survey was conducted of suppliers from higher risk industries that tended to employ high levels of temporary labour, such as cleaning, catering and waste, accommodation, overlay and logistics. From the results, particular suppliers were selected for additional due diligence to check their processes were robust. This included a document review, confidential worker interviews and a short meeting with a nominated labour provider to check that the supplier's policies were being communicated effectively.

For **suppliers manufacturing internationally**, assessments were made against the OC Sustainable Sourcing Code, including a health and safety inspection of the factory, confidential worker interviews and document reviews for labour and wages. A corrective action plan was created after each assessment and the supplier had to provide a plan of remediation with evidence, within an agreed timeframe.

Example – **uniforms and merchandise**:

Sites that were manufacturing uniforms and branded merchandise were required to complete a factory declaration form and provide a valid independent social audit report for each site of production. Each report was reviewed by the Ethical Trading Manager or a member of the Sustainability team and any non-compliance was noted before approval was given. A tracker was created to monitor non-compliances and their closure.

### Training on modern slavery and trafficking

Training was provided to the relevant departments on understanding the risk of modern

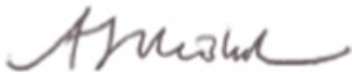
slavery and human trafficking, particularly for contract managers of higher risk suppliers. The OC also worked with an external organisation to conduct training on best practice. Modern slavery awareness training was delivered to all workforce managers, who

served as the HR leads at venues during Games time. The recorded training session was published on a learning management platform that volunteers could access, as well as on a portal for contracted suppliers.

# STATEMENT APPROVAL

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This statement was approved by the Permanent Secretaries of all ministerial departments and is signed on their behalf by Alex Chisholm, Chief Operating Officer for the Civil Service.



**Signed:** Alex Chisholm

**Date:** 10/08/2023

**CHIEF OPERATING OFFICER FOR THE CIVIL SERVICE**



# GLOSSARY

AGO	Attorney General's Office
ALB	Arm's-Length Body
CA	Contracting Authority
CCS	Crown Commercial Service
CIPS	Chartered Institute of Purchasing and Supply
CPS	Crown Prosecution Service
FM	Facilities Management / Buildings & Facilities
FTE	Number of Full Time Equivalent staff in a department
GCF	<a href="#">Government Commercial Function</a>
ICT	Information & Communications Technology
KPI	Key Performance Indicator
MSAT	<a href="#">Modern Slavery Assessment Tool</a>
MSHT	Modern Slavery and Human Trafficking
MSRPT	Modern Slavery Risk Prioritisation Tool
OSCE	Organization for Security and Co-operation in Europe
OSRCT	Office of the Special Representative on Combatting Trafficking of Human Beings
PPN	Procurement Policy Note
SME	Small to Medium-sized Enterprise
TCV	Total Contract Value
<b>Contract Tiering</b>	
Gold Contract	Important contracts or other commercial arrangements that are business-critical
Silver Contract	Operationally important contracts or other commercial arrangements that may be business-critical but where annual expenditure is typically between £5m and £40m.
Bronze Contract	Includes operational or transactional contracts or other commercial arrangements where annual expenditure is less than £5m
Tier 1	Suppliers that you directly conduct business with
Tier 2	This is where your tier 1 suppliers get their materials
Tier 3, 4 etc.	Tier numbers increase as you go down a supply chain towards the raw materials