

Westminster City Council Modern Slavery Statement 2022-2023

Foreword

Adam Hug

Leader of the Council




Our commitment to fair pay and treatment extends beyond the boundaries of our Westminster community, to encompass those people involved in providing our goods, works and services contracts. Protecting workers' rights and preventing modern slavery and exploitation is one of the foundations upon which we can build a fairer economy, and pride ourselves in being a fairer council.

Over the last six months we have made significant progress, but we will continue to work alongside public sector peers, external experts and other relevant agencies to learn and share best practice to achieve the best possible outcomes for supply chain workers.

Modern Slavery and human trafficking remain pervasive issues both at home and abroad. One key outcome of our [Fairer Westminster Strategy](#) is that 'our procurement is responsible and ensures ethical treatment of people'. We are now a year into delivering this Strategy and commit to continuing to do all we can to make this outcome a reality.

This renewed Modern Slavery Statement describes how we are increasing due diligence to prevent worker exploitation through our procurement and commissioning activities. It also sets out how we are gaining a clearer picture of risks associated with different sectors and supply chains.

Clr Jessica Toale
Single Point of Access for Modern Slavery




Clr David Boothroyd

Cabinet Member for Finance & Council Reform




As set out in our [Responsible Procurement & Commissioning Strategy](#); Westminster City Council is committed to ensuring that human and labour rights are respected throughout our supply chains and that we have the right due diligence procedures in place to tackle modern slavery and exploitation.

Our Procurement & Commercial Service is working hard to continuously improve our approach and has taken positive steps to build partnership relationships with contract managers and our suppliers to prioritise action that needs to be taken. This Statement sets out the progress we have made to date and the key steps we will take over the next year to strengthen this collaboration increase supply chain transparency to identify and mitigate risk.

Westminster City Council recognises the importance of responsible procurement and employs staff dedicated to maximising the opportunities our supply chain partners present and minimising the adverse impacts associated with multi-tiered and global supply.

Preventing modern slavery and exploitation in our supply chains is a real challenge. We are proud of the work undertaken to date but fully recognise our responsibility to go further this coming year. We commit to implementing the Modern Slavery Action Plan set out in this Statement, as part of all procurement and commissioning activity, across all departments and to continuously upskill our staff and contractors to achieve this.

Stuart Love
Chief Executive Officer




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1. Introduction

1.1 Our Modern Slavery Statement

This Modern Slavery Statement describes Westminster City Council's structure and its supply chains, the steps taken by the council to understand potential modern slavery risks related to our business and supply chains and the action taken to prevent modern slavery and human trafficking between 1 April 2022 – 31 March 2023.

An Action Plan setting how we intend to continuously improve our approach with both existing and new suppliers has been set out at the end of this Statement, alongside the indicators that will be used to measure our performance.

Work to prevent modern slavery and exploitation in the council's supply chains is being coordinated by the Procurement and Commercial Service and is being delivered in collaboration with departments across the council as part of all procurement activity over £100k. The approach has been endorsed by the Executive Leadership Team and Councils Cabinet who will support the ongoing implementation.

1.2 Defining modern slavery

Modern slavery is a violation of human rights and is defined within the Modern Slavery Act 2015 as human trafficking, slavery, servitude and forced or compulsory labour. Modern slavery includes exploitation through:

- **Forced labour** – being made to work for little or no money
- **Sexual exploitation** – coerced or forced into selling sex
- **Domestic servitude** – forced to work within a home environment for little or no pay
- **Criminal exploitation** – forced to break the law for someone else e.g. begging or selling drugs
- **Forced/sham marriage** – forced to marry someone without consent
- **Organ harvesting** – organ removal for financial gain

Westminster City Council's role in tackling modern slavery in the borough is set out for context. However, the focus of this Modern Slavery Statement is on tackling forced labour; how we as an organisation ensure that this has no place within our business; the steps we have taken so far to try and ensure that it does not form a part of our supply chains and the actions we will take to make ongoing improvements to our approach to due diligence.

Victims/survivors of modern slavery can be of any age, gender or ethnicity. Exploiters often target the most vulnerable people in society, for example those fleeing conflict, children or people impacted by homelessness. Exploiters wield control over the people they exploit making it difficult for victims/survivors to leave. Exploiters may use violence, threats of violence, perceived debt or threats to the lives of victims/survivors or their family and friends. Victims/survivors of modern slavery may not know who to trust or where to seek help to leave the exploitative situation. For victims/survivors of modern slavery, the consequences to their

physical and mental wellbeing can be severe. Specialist support is often required to allow them to recover from their experiences of exploitation.

1.3 The extent of modern slavery

Modern slavery is a global human rights issue, and the council's supply chains span the UK and international borders. In 2017, the International Labour Organisation estimated there were 40 million people in modern slavery, with 25 million people exploited through forced labour.¹

There are an estimated 100,000 victims/survivors of modern slavery in the UK². The National Referral Mechanism (NRM) is the UK Government's system used to record the number of victims of modern slavery in the UK and provide support to recover from their exploitation. In 2021, 12,727 referrals were made for potential victims to the NRM in the UK. In 2021, Westminster City Council completed 25 NRM referrals for adults and children they encountered who were potential victims of modern slavery.

1.4 International legal framework

Founded in October 1919 under the League of Nations, the International Labour Organisation (ILO) is a United Nations agency whose mandate is to advance social and economic justice by setting international labour standards. The ILO's labour standards are set out in 189 conventions and treaties, of which eight are classified as fundamental according to the 1998 Declaration on Fundamental Principles and Rights at Work. Together, they protect freedom of association and the effective recognition of the right to collective bargaining, the elimination of forced or compulsory labour, the abolition of child labour, and the elimination of discrimination in respect of employment and occupation.

The United Nations Guiding Principles on Business and Human Rights are a set of guidelines for States and companies to prevent and address human rights abuses committed in business operations. They were unanimously endorsed by the UN Human Rights Council in 2011. These Principles support the achievement of the United Nations Sustainable Development Goal (UNSDG) Target 8.7 to eradicate forced labour, modern slavery and human trafficking by 2030.

1.5 United Kingdom legal framework:

The Government's work to implement the UN Guiding Principles on Business and Human Rights is set out in the UK's National Action Plan on Business and Human Rights. The most significant legislation to pursue human rights in business enacted within the UK is the Modern Slavery Act 2015. Under Section 54 of the Act, commercial organisations with an annual turnover of more than £36 million are required to report the steps they have taken to ensure modern slavery is not taking place in their business and supply chains.

A Private Members' Bill to make further provision for transparency in supply chains in respect of slavery and human trafficking has been sponsored by Baroness Young of Hornsey. As well as

¹ International Labour Organization, (2017) Global Estimates of Modern Slavery: Forced Labour and Forced Marriage

² Justice & Care and The Centre for Social Justice, (2020) It Still Happens Here

strengthening existing provisions for commercial organisations, this Modern Slavery (Transparency in Supply Chains) Bill seeks to broaden the scope of the Modern Slavery Act 2015 to include public authorities.

Westminster City Council is publishing this Modern Slavery Statement in readiness for this change in law and demonstrate our ongoing commitment to tackling modern slavery.

2 Organisational structure and supply chains

2.1 Westminster City Council:

The City of Westminster is home to just over 205,000 residents, with an additional approximately 645,000 workers, students and visitors travelling into the borough each day.

The council comprises of 54 councillors elected every four years, three for each of the 18 wards. They councillors are democratically accountable to residents of their ward. The overriding duty of councillors is to the whole community, but they have a special duty to their constituents. All councillors meet as the council and these meetings are open to the public. Here councillors decide the council's overall policies and set the budget each year. The council elects a Leader who in turn appoints and provides leadership to a Cabinet, responsible for implementing the policies decided by the council within the budget set.

Executive Leadership: Westminster City Council employs approximately 2770 people on a full-time basis. Our Chief Executive oversees the council's seven Directorates, some of which are 'bi-borough' Directorates (serving both Westminster City Council and the Royal Borough of Kensington and Chelsea):

- **Deputy Chief Executive, and Bi-Borough Executive Director of Adult Social Care:** Manages the Bi-borough Adult and Public Health department ensuring the safety and wellbeing of vulnerable people over 2 boroughs, in conjunction with other key strategic partners.
- **Executive Director of Finance and Resources:** Responsible for the council's finance, property investment, procurement, IT (Information and Technology) and digital transformation services as well as the council's corporate property department.
- **Executive Director of Growth, Planning and Housing:** Responsible for the delivery of high-quality housing and a vibrant economy with opportunities for all and places workers, visitors and residents can enjoy.
- **Executive Director of Innovation and Change:** Responsible for the council's policy, strategy, analysis, change and communication functions. Supports the council in engaging with residents and businesses, ensures that strategy is underpinned by analysis and evidence, and drives innovation across the council's services.
- **Executive Director of Environment, Climate and Public Protection:** Responsible for keeping the city safe, clean and secure for residents and visitors to enjoy.

- **Bi-Borough Executive Director of Children's Services:** In conjunction with other key strategic partners, responsible for improving the lives and life chances of children and young people within Westminster and Kensington and Chelsea.
- **Director of People Services:** Responsible for the council's People Services function, supporting Westminster through driving initiatives whose foundations lie in the three pillars of the Westminster Way; everyone has talent, everyone is a leader, and everyone is valued.

2.2 Procurement and Commercial Service:

The Procurement and Commercial Service (P&CS) supports officers across the council with best practice advice and guidance through the stages of the procurement and contract management lifecycle. It is a centralised service that leads on all procurement activity valued at £100,000 and above. With the creation of a new Buying Team within the P&CS later this financial year, this service will be expanded to contracts worth £25,000 or more. The team is currently comprised of the following functions, with roles relevant to action on modern slavery also described:

- **Heads of Commercial** – Provide a strategic link between the Procurement & Commercial Services and each council Directorate. Their role in relation to modern slavery is to communicate upcoming training opportunities and changes in policy and procedures to relevant Directorate representatives. They also provide a layer of quality assurance when the council tenders for higher risk/ spend contracts.
- **Tendering Service** – Undertake procurement and commissioning exercises over the value of £100k. Commercial managers and officers work closely with the responsible procurement function to ensure that modern slavery and exploitation risks are considered from the outset. Responsibility for spend under a value of £100k is currently devolved to departments and for that reason, and in the interest of prioritising resources and impact, the actions set out within this Statement mostly relate to contract values of £100k and above, however an additional action has been included to incorporate due diligence requirements within the specifications of high risk contracts worth £25,000 or more, as and when the new Buying Team has been established.
- **Responsible Procurement and Supplier Relationship Management** – The majority of contract management is devolved to departments. However, this team oversees the council's Contract Management Framework and is currently refreshing and re-launching this Framework to better align with responsible procurement implementation, as well as improving aspects such as health and safety and safeguarding. The responsible procurement and commissioning (RPC) function has recently been moved into this team reflecting the progress made on embedding RPC into governance and tendering procedures, allowing a deeper focus on supporting suppliers with RPC implementation. The RPC function leads on the delivery of the Responsible Procurement & Commissioning Strategy and associated modern slavery workstream, including ensuring that contractual requirements related to modern slavery are incorporated into tenders, contracts and supplier performance monitoring processes.

- **Procurement, Policy and Systems** – Ensure that relevant law and policy, including government issues Procurement Policy Notes (PPNs) is followed across all procurement activity, provide systems to ensure efficient and transparent procurement activity, which can be reported effectively. Part of this team’s role is to track the Tendering team’s performance in terms of embedding responsible procurement and commissioning requirements into tenders, with a new specific KPI introduced on % high risk contracts with modern slavery due diligence criteria integrated.

2.3 Governance

The Procurement Code sets out the requirements which must be followed in respect of all procurement and contract management activity. The Code states that the council expects all officers involved in procurement activity to ensure they are aware of and comply with all legislation, corporate strategies and policy; to take the necessary action to formally disclose situations of potential, perceived or actual conflict of interest; to behave with the highest levels of probity and integrity, making specific reference to the Bribery Act 2010 and the council’s Code of Conduct. It informs officers of the appropriate governance and procurement assurance processes to be followed, as well as the approvals that must be obtained to ensure good business practices are applied and risks are minimised.

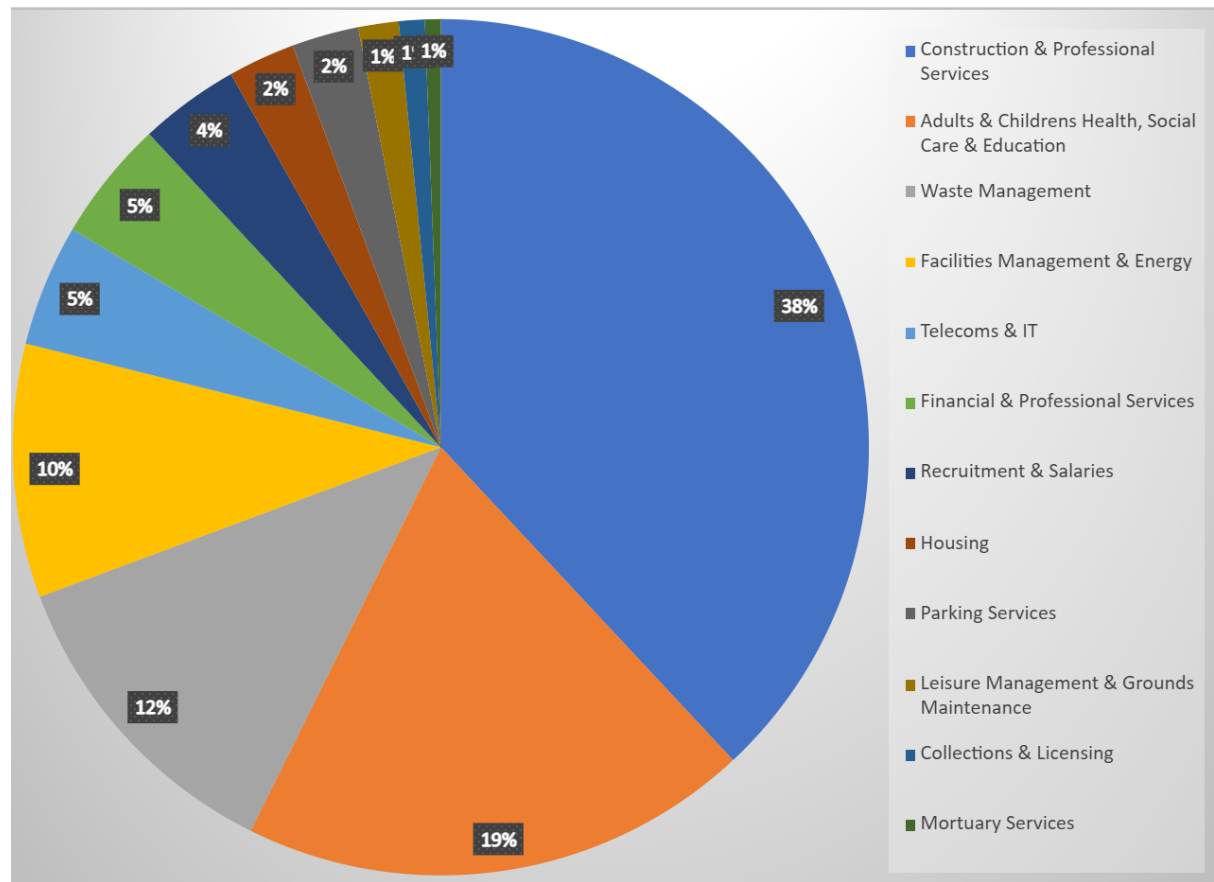
The Commercial Gateway Review Board (CGRB) is a governance body with membership from Procurement, Finance, Legal and Supplier Management, which reviews procurement activity at key stages, to provide assurance to Executive Directors and Cabinet Members responsible for making decisions.

- At the **procurement strategy** stage, the Board reviews and challenges the justification for the proposed selection and award criteria, including the split between Quality, Responsible Procurement and Price. Considerations will include budget requirements, influenceable spend, market size and capability, risk inherent in the services, and what can realistically be achieved. The procurement strategy will justify the elements of Responsible Procurement or Commissioning that have been included and will explain how the market has been (or will be) engaged to ensure suppliers are aware of the council’s expectations and their responsibilities
- At **contract award** stage, the Board reviews the commitments made by the preferred bidder relating to Responsible Procurement to ensure that they are appropriate – this includes understanding how the elements will be monitored during the contract and whether any specific KPIs have been included in the contract.

2.4 Spend Profile and risk prioritisation:

Last year, Westminster City Council spent over £600 million on goods, works and services to deliver statutory services and support our community. This spend can be broken down into the following categories:

Council Spend breakdown Financial Year 2022/23



The council aims to identify and mitigate risks of modern slavery and exploitation associated with all contracts. However, to prioritise our resources to engage with, train and support our supply chain partners, the following sectors have been identified and are set out below in order of priority. These categories represent approximately 92% of council spend:

- **Construction and related professional services** – Risks include direct and sub-contracted workers on site, especially jobs requiring less specialised skill sets, services associated with construction sites e.g., security, as well as potential modern slavery and exploitation in the supply chain of a wide range of construction products and materials.
- **Waste Management** – There are some risks associated with the direct waste collection and disposal contract workforce in the UK and there are high but far more complex risks associated with transitioning to electric fleets and the prevalence of modern slavery and exploitation in mineral supply chains e.g., cobalt and lithium used in electric vehicle batteries.
- **Telecoms & Information Technology (IT)** – Risks in this sector are most common in global supply chains e.g., when technical support services are outsourced overseas, but especially when contracts include the provision of IT hardware. There are high risks associated with manufacturing including assembly, testing, packaging and labelling of (sub)components, and of products themselves including electronic components, sub-assemblies or materials (especially gold, tin, tungsten, tantalum, which can be derived from ‘conflict minerals’)

- **Facilities Management & Energy** – This broad category has a wide variety of risks. Relatively low risks are associated with directly employed staff in e.g., catering, cleaning and security sectors. Higher risks further up the supply chain include food harvesting, processing and fisheries, manufacturing of textiles for uniforms and PPE (Personal Protective Equipment) and manufacturing of other products, especially electrical and electronic equipment e.g., solar panels, surveillance equipment, electric vehicle charge points, heat pumps etc.
- **Housing** – The main risks associated with this category are similar to the construction and facilities management & energy categories above i.e., contracts involving jobs requiring less specialised skill sets and those through which we source high risk products such as electrical and electronic equipment. Contracts falling under this category that relate to temporary, sheltered housing or similar will be prioritised in terms of the opportunities for contractor staff to be trained on identification of potential victims of modern slavery.
- **Parking** – There are low risks associated with direct jobs requiring less specialised skill sets and higher, more complex risks associated with higher supply chain tiers including technical support services based overseas and especially ICT including surveillance equipment.
- **Adults & Children’s Services, Health, Social Care and Education** – Priorities for these contracts is the training of staff working with vulnerable service users on identification, support and signposting of potential victims of modern slavery. Risks also exist, however, in the use of agency care workers and in terms of consumables associated with such services, including Personal Protective Equipment (PPE).
- **Recruitment** – Risks are low but exist within UK recruitment agencies, especially associated with workers classed as vulnerable or those with English as a second language (ESOL).

3 Preventing modern slavery within the council

3.1 Ending Modern Slavery (bi-borough) Strategy:

Westminster City Council has a dedicated officer shared with the Royal Borough of Kensington and Chelsea coordinating the councils’ responses to modern slavery. The council is an active member of the Modern Slavery and Exploitation Operational Group, a partnership across Westminster, Kensington and Chelsea and Hammersmith & Fulham. The Operational Group is attended by council officers, Metropolitan Police, NHS (National Health Service), Non-Governmental Organisations (NGOs) and other professionals responding to modern slavery.

The actions set out within this Modern Slavery Statement is part of the council’s wider response to modern slavery, as outlined in the five-year strategy ‘[Ending Modern Slavery: Our Strategic Coordinated Community Response 2021-2026](#)’. This work is delivered in partnership with the Royal Borough of Kensington and Chelsea and was co-produced by partners, including survivors and residents. The Ending Modern Slavery Strategy is based on four key objectives: Victims Identified, Victims Supported, Exploiters Brought to Justice and Exploitation Prevented. This Modern Slavery Statement is part of our Strategy’s objective of ‘Exploitation Prevented’.

3.2 Fairer Westminster Strategy

Westminster City Council Launched its [Fairer Westminster Strategy 2022-26](#) in October 2022 and its Delivery Plan in March 2023. The Strategy is based on five pillars: Fairer Environment, Fairer Communities, Fairer Economy, Fairer Housing and Fairer council. The delivery of our Strategy is based on the principles of openness and transparency, partnership and collaboration and diversity and inclusion.

This Strategy recognises the key role procurement and commissioning have in ensuring a Fairer Westminster; how our council does business and the impact on the wellbeing of those in our supply chains. A specific outcome within the Strategy states that ‘Our procurement is responsible and ensures ethical treatment of people’ and this Modern Slavery Statement, set within the context of our Responsible Procurement and Commissioning Strategy detail how we intend to do this.

3.3 Policy framework

Westminster City Council has various policies in place to prevent inequality in the workplace, protect against discrimination, and ensure that there is always a safe route for staff to escalate malpractice concerns. They include:

- **Employee Code of Conduct:** All Westminster employees, and the employees of consultants, contractors, partners, secondees and agency staff carrying out work or providing services on the council’s behalf must act in accordance with the council’s Employee Code of Conduct. As part of this, staff recognise a duty to comply with the law, the council’s constitution, code of governance and terms and conditions of employment. This includes any circumstances that may give rise to human trafficking or slavery risks.
- **Whistleblowing Policy:** Applies to employees of the council, employees of contractors working for the council, those providing services under a contract or other agreement with the council, and voluntary workers working with the council. All such individuals are encouraged and indeed, expected to raise suspected misconduct, illegal acts or failure to act within the council and are assured that they are free to do so without repercussions. This includes any serious concerns that individuals have about service provision or the conduct of officers or members of the council or others acting on behalf of the council. In the period 1st April 2021 – 31st March 2022 there were no concerns about potential risks of modern slavery raised through whistleblowing channels.
- **Recruitment Policy:** The council has a robust and transparent recruitment and selection process. We ensure all our staff, including agency employees, are appropriately checked. Offers of appointment are dependent upon receipt of original identification documents, eligibility of right to work in the UK, satisfactory references, evidence of any required qualifications and registrations, and where necessary, the outcomes of Disclosure and Barring Service checks. For agency employees, we work with a neutral vendor-managed service provider. We ensure that they comply with our rigorous processes in recruiting their new staff.

- **Pay Policy:** The council is open and transparent about the pay of the Chief Executive and senior officers, as well as the gender pay gap data. We continue to believe that to employ the best people and ensure the best outcomes for residents we must be prepared to pay competitive salaries. The minimum full-time equivalent hourly rate of our pay to employees as of 1st April 2022 was £13.53, which is significantly higher than the recommended London Living Wage rate of £11.95.
- **Anti-Fraud and Corruption Strategy:** The council will not tolerate fraud or corruption by our councillors, employees, suppliers, contractors or service users. We are committed to investigating all allegations of fraud or corruption and pursuing the sanctions available in each case, including removal from office, dismissal and/or prosecution.
- **Anti-Bribery Policy:** It is the council's policy to take a zero-tolerance approach to bribery and corruption and we are committed to the detection, prevention and deterrence of bribery. All our personnel will act honestly and with integrity at all times, reporting any suspicions they have of bribery either occurring or being offered.
- **Anti-Money Laundering Policy:** Through our policy on anti-money laundering staff and Members of the council have a responsibility to be vigilant and act promptly where money laundering is suspected. We are committed to ensuring our continued compliance with the legal and regulatory requirements in this area.
- **Safeguarding Policy:** The council supports the London Multi-Agency Adult Safeguarding policies and procedures built on strong multi-agency partnerships. The council supports and protects adults at risk to prevent abuse and neglect where possible, providing a consistent approach when responding to safeguarding concerns. This shared approach encompasses the joint responsibility for managing risk, promotes timely information sharing and enhances co-operation among participants that respects boundaries and confidentiality within legal frameworks and underpins the six principles of all adult safeguarding work. The council adheres to the London Child Protection Procedures and statutory guidance Working Together to Safeguard Children 2018 to ensure that children at risk of harm from modern slavery and exploitation are safeguarded appropriately. The council is committed to multi-agency partnerships working via the Local Safeguarding Children Partnership (LSCP) and the Violence Against Women and Girls Board (VAWG).
- **Ethical Procurement Policy:** This policy is a set of core principles that the council abides by in the treatment of its workers, and cascades to its contractors as part of our standard terms and conditions. These requirements apply to all contracts over a value of over £100,000, of any duration and within any sector. Sections of the Policy include:
 1. Employment, contractual and working conditions
 2. Freedom of association and the right to collective bargaining
 3. Working hours and regular employment
 4. Humane treatment, equalities, trade unions and blacklisting
 5. Living Wage

4 Preventing modern slavery: Our supply chains

4.1 Responsible Procurement and Commissioning Strategy

The £600 million annual spend on third party contracts is seen by the Council as a significant lever to drive positive action on important issues that have become an increasing priority locally, nationally and globally. The council recognises our potential to tackle the climate emergency, contribute to the local and national economic recovery, drive greater workforce diversity and inclusion, and increase transparency to protect human and labour rights in our supply chains.

Procurement & Commercial Service has a responsible procurement function who oversees the council's approach to achieving social value, diversity and inclusion, environmental sustainability and ethical sourcing through its procurement and commissioning activities and leads on projects to make continuous improvements in these areas.

The council's Procurement and Commercial Service worked with colleagues across the organisation to consult, develop and launch Westminster's most recent [Responsible Procurement and Commissioning \(RPC\) Strategy](#) in April 2023. The RPC Strategy serves as a framework to deliver Westminster's local priorities and contribute towards wider sustainable development goals, whilst providing the best possible value for the council, its residents and its partners.

Ensuring fair pay and conditions of our supply chain workforce and combatting modern slavery and labour rights abuses are key commitments within the RPC Strategy. These commitments are aligned with our overarching 'Ending Modern Slavery' Strategy.

4.2 Procurement Process

As part of our Responsible Procurement & Commissioning Strategy, modern slavery due diligence is integrated into each stage of the procurement process to ensure the right level of ambition is set, our expectations are clear, that we work with committed contractors and that actions are regularly monitored and continuously improved through the life of each contract.

Terms and conditions:

- Westminster's standard terms and conditions set out the requirement that contractors, their staff and their subcontractors must comply with Modern Slavery legislation and our right to terminate the contract for breaching these terms. If in scope of Section 54 of the Modern Slavery Act 2015, contractors must complete a valid annual Modern Slavery Statement.
- If a contractor suspects or becomes aware of a Modern Slavery Act Offence, the contractor is required to notify the council and the council may inform the Police or any relevant bodies and require the contractor to remove any subcontractor or staff member suspected or known to have committed an MSA Offence from the performance of the contract.
- Our terms and conditions also refer to the council Policies set out in Section 3.3. Those of particular relevance to the conduct of supply chain partners include our Policies on Whistleblowing, Anti-bribery and Corruption, Safeguarding and Ethical Procurement.

Specification/ Scope of Works:

- Setting out the steps that will be required up front forms the basis of the ongoing collaborative work that takes place to increase supply chain transparency. All tender exercises that Westminster City Council undertake, for all relevant contracts within our high-risk categories set out in Section 2.4 of this Statement, include specific contractual requirements within the goods/service specification or scope of works. These requirements build upon our standard terms and conditions and supplier selection requirements.
- An introduction is provided, stating why additional modern slavery criteria are being incorporated, including why the contract is deemed high risk. This is followed by a clear set of time-bound actions, the extent of which are determined by factors including the nature and duration of the contract, anticipated level of risk, the likely structure of supply chain tiers etc. A typical set of requirements include:
 - A designated point of contact responsible for modern slavery due diligence
 - An initial risk assessment of the supply chains involved in the delivery of our contract – refreshed over time and when new organisations are incorporated
 - The development of (an) action plan(s) to mitigate the modern slavery and exploitation risks identified, with associated progress updates

Supplier selection:

- Our Supplier Charter, which forms a standard part of the council's supplier selection process, is designed to ensure that we work with contractors with similar value and commitments as Westminster. The Charter is implemented as a set of pass/fail questions within the Selection Questionnaire or qualification envelope, but the requirements are tailored according to the nature of the contract, value and duration to ensure relevance and proportionality i.e. they are included on a project-by-project basis.
- Aside from the requirement to provide a Modern Slavery Statement up-front if they fall within the scope of Section 54. Of the Modern Slavery Act 2015, for all other requirements bidders are asked to indicate "yes/no" to committing to either:
 - that the requirement has already been achieved or
 - that it will be achieved within the 'date required' timeframe, at which time evidence will be sought by WCC Contract Managers. This allows time for newer/smaller organisations to put resources in place within 3, 6 or 9 months depending on the requirement.
- If suppliers indicate 'no' that they will not be willing or able to meet any of the requirements within the timeframe stipulated, they will be given the opportunity to detail why this is the case and put forward alternative timeframes or proposals. It is at the council's discretion as to whether this bidder will be allowed to progress. The council will seek clarification with the bidder before the decision is taken. Mutually agreed requirements would then be inserted into the contract specification.
- The following is an excerpt from the Supplier Charter, showing the requirements that relate to modern slavery. These selection criteria are used specifically within tenders that pose a high risk of modern slavery as part of direct service delivery or within the supply chain. As such, they are added into tenders on a case-by-case basis, establishing their technical and professional ability in terms of supply chain management and tracking systems relating to modern slavery due diligence, that they will be able to apply when performing the contract.

	Supplier Charter Requirement	Date required	Sectors/ Spend categories/ Contract type	Contract Value	Duration
5. Modern Slavery	a) Supplier has a published, valid Modern Slavery Statement as set out in Section 54. Modern Slavery Act (MSA) 2015	SQ	Suppliers within scope of s.54 of the Modern Slavery Act 2015	213k+ goods & services, £5.3m works	Any
	b) Supplier has a modern slavery/ risk/ H&S/CSR lead or point of contact whose (at least partial) role is to oversee and continuously improve approaches to Modern Slavery due diligence within (in)direct recruitment and supply chains	Within 3 months	Suppliers within sectors at high risk of modern slavery within (sub) contracted recruitment e.g. those within construction, waste, security, hospitality, agriculture, janitorial, logistics & transport, health & social care	£500k+ goods & services, £5.3m works	12 months+
	c) Supplier has summarised the due diligence procedures undertaken to guard against modern slavery occurring through (in)direct recruitment or supply chains <i>(For suppliers not in scope of Modern Slavery Act 2015 s.54)</i>				
	d) Supplier has a suitable system/ procedure in place to enable supply chain transparency and assess modern slavery risk	Within 6 months		£2m+ goods & services, £5.3m works	
	e) Supplier has completed the Modern Slavery Assessment Tool (MSAT)		AND/OR	£5m+	
	f) Supplier has initiated recommended actions identified by the MSAT	Within 9 months	Suppliers sourcing high-risk products e.g. food, construction materials, electronic equipment, other manufactured products e.g. textiles, PPE & medical supplies.		

Supplier Evaluation:

- For lower risk contracts, those with which the council has relatively low leverage and/or those within which the main risks are not related directly enough to the subject matter of the contract, supplier approaches to modern slavery due diligence are evaluated as part of award criteria, as opposed to set requirements in the specification/ scope. In December 2021, the council approved an increase in minimum weighting for responsible procurement evaluation applied to tenders from 5% to between 10-20% minimum, depending on the nature of the contract and the risks and opportunities involved. We aim to increase this minimum weighting to between 20-30% minimum by 2025/26.

Contract Management:

- The aspects set out below are embedded in the procurement process and subsequently handed over to devolved contract managers after the contract is awarded and before mobilisation so that they are clear on what needs monitoring and when.
- For more detailed requirements, such as supply chain risk mapping exercises and the subsequent development of contract specific action plans, the P&CS team supports the contract manager and supplier with fulfilling them:
 - Supplier Charter requirements: These are committed to by suppliers as part of the SQ/ qualification envelope and are tailored according to contract value, nature and duration
 - Supplier's commitments made during bid: These tend to be offers and commitments related to environmental sustainability, social value and diversity & inclusion, however questions on ethical sourcing may be asked as part of supplier evaluation instead of fixed contractual requirements for lower risk contracts, or those where high-risk aspects only form a minor part of the subject matter of the contract.
 - Any contractual requirements within the specification/ scope of works: Modern slavery milestones including time-bound requirements to undertake risk assessments, hot-spotting exercises, action plans to mitigate risk etc.
 - Ethical Procurement Policy: These policy requirements are set out in our standard terms and conditions. These tend to only be actively monitored by exception if a complaints/

issue is raised, but contract managers are made aware of them so that they are well versed in the council's position if any concerns are raised.

Frameworks, direct awards and contract extensions:

- The council's Tendering Policy has now been updated to include a new, specific RPC requirement for non-competitive contract award exercises i.e. direct awards, contract extensions, variations, or use of frameworks where there is no route to include additional supplier selection or evaluation (i.e. direct call-offs). This requirement is that the minimum that should be included to award such a contract is:
 - the Ethical Procurement Policy, embedded within the specification if it is not possible to amend/ include our own terms and conditions,
 - and the Supplier Charter. These questions, usually posed as part of supplier selection, are re-worded and instead included in the specification as set requirements. As set out in the section 4.2.4, this includes specific modern slavery requirements, tailored to the value, nature and duration of the contract.

4.3 Training on modern slavery in supply chains

An extensive amount of Responsible Procurement and Commissioning training was delivered to the P&CS team throughout 2022 and 2023, which included a section on the council's approach to tackling modern slavery in supply chains. This was comprised of a series of online sessions focused on specific sectors alongside a face-to-face half day interactive workshop, where staff participated in exercises to apply new RPC approaches to example tenders.

Last year, responsible procurement, contract management and modern slavery leads from Westminster and Kensington & Chelsea input into the development of a series of three 3-hour training sessions, which were delivered by 'Action Sustainability', subject-matter experts in modern slavery in supply chains. These were interactive workshops participated in by 120 procurement, commissioning and contract management staff across the boroughs. Themes covered included:

- Modern slavery context, prevalence and case law
- Supply chain transparency
- Procurement due diligence
- Risks, vulnerabilities and demographics
- Risk and supply chain mapping

4.4 Existing contractor risk assessment and prioritisation

Many public sector contracts last for a significant number of years, typically three years, but it can be up to eight years or even longer depending on the nature of the contract. Suppliers and service providers who were awarded contracts before the new due diligence procedures covered in sections 4.1 - 4.2 were implemented may only have contractual modern slavery requirements set out in their terms and conditions, therefore they may not have continuous improvement requirements on supply chain transparency built into their contracts. The Procurement and Commercial Service therefore recognise the importance of undertaking risk assessments of our existing contracts.

Existing higher spend contracts were looked at to undertake a high-level assessment of modern slavery risks, the methodology of which was aligned with the Government's Modern Slavery Assessment Tool (MSAT) and Home Office guidance. This high-level assessment aimed to determine the relative level of risk of modern slavery occurring within our contractors' supply chains and/or the opportunity to identify such exploitation. RAG (Red, Amber, Green) ratings were assigned to the following parameters:

- The inherent level of **risk associated with the industry or sector** – higher risk sectors relevant to local authorities include construction, waste management, manufactured goods including medical and ICT equipment, services including hospitality, security services, cleaning and catering, logistics including warehousing, transport, healthcare, social care etc.
- **Commodity type** – Imports at highest risk of forced labour in the UK are electronics, food products (fish, cocoa, rice), garments, personal protective equipment (PPE) and construction materials (bricks, cement, rubber).
- The risk associated with the **supply chain model** - contracts with significant use of sub-contractors, complex employment relationships with a reliance on agency, outsourced or subcontracted workers, use of labour recruiters in the supply chain, those associated with complex supply chains and those where purchasing is predicted only on a profit margin matrix are typical factors implying higher risk.
- **Nature of the contractor workforce** – for example, contracts relying on jobs requiring less specialised skills sets are at higher risk, as are those with high numbers of temporary, seasonal, or agency workers, those involving dangerous or physically demanding work and/or isolation of workers etc.
- The level of opportunity presented for staff employed on contracts to **identify potential victims of modern slavery** is also considered when identifying contracts of focus i.e., if the contract involves front line services with visibility of people vulnerable to exploitation e.g., homelessness outreach or contracts involving visiting premises or street patrols.

Some aspects that are important to factor into the assessment are not known by the P&CS team as they are not directly involved in the detail of the delivery of the goods, services or works. The factors assessed above are therefore just the starting point of the risk assessment and other factors need to be considered through engagement with the WCC contract manager, supplier account manager and other relevant colleagues. These include supplier/ supply chain locations (some countries have a higher prevalence of modern slavery than others) and the context in which the supplier operates (e.g., there are higher risks associated with conflict zone, regions of high levels of poverty and unemployment, those with widespread discrimination amongst certain groups, etc.).

4.5 Existing contractor Modern Slavery Statement assessment to inform engagement

For both existing and new contractors within sectors deemed high risk, the council assesses the quality of the supplier's Modern Slavery Statement if they fall under the scope of section 54 of the Modern Slavery Act. If they do not fall within scope and are a new supplier, they are required to produce a summary of due diligence and other action taken by their business as

part of the Supplier Charter requirements set out in our Selection Questionnaire/ qualification envelopes.

Our assessment matrix aims to apply the guidance from the Home Office on what a Modern Slavery Statement should ideally contain and provide a score for each area covered, to enable the council to provide feedback and ask suppliers to focus on areas that are less well developed.

Assessment Matrix used to evaluate the quality of supplier Modern Slavery Statements

1. Organisational structure	Describes main products / services / customers
	Describes structure of org (location of company operations, subsidiaries)
	Discloses countries sourcing goods & services
	Discloses supplier details (names, contract type, products)
	Describes workforce (temp/ seasonal)
2. Policies	Relevant policies outlined (incl whistleblowing, Code of Conduct, HRs, etc)
	Process for development, oversight & implementation
	Senior leadership involvement & sign off
	Informed external stakeholders
	Policy development included training & awareness among staff
	Improving old policies
	Organisational involvement in development of policy
3. Due diligence	Assessment of supplier's risk of forced labour before entering contract
	Sets out supplier Code of Conduct / principles & expectations with suppliers
	Sets out ILO labour standards & expectations with suppliers
	Suppliers participate in self-certification or questionnaire incl MS component
	MS provisions included in contracts
	Details of auditing process (incl unannounced audits)
	Details on risk management processes (whether it covers MS / labour rights)
	Monitoring of supplier risk (engagement with stakeholders incl workers)
	Grievance mechanisms in place (raising complaints / concerns)
4. Risk assessment & management	Provide details on risk assessment/ HRs / MS risks in supply chains; or conducted a focused assessment
	Disclosure of violations that have been identified (country, commodity, tier, etc)
	Engagement with potentially affected rights holders when undertaking assessment
	Engagement with external stakeholders in developing risk assessment
	Mapped supply chain
	Provides details of social audits
	Developed action plans
5. Effectiveness	Disclosure of corrective action plans (incl results)
	Reviews suppliers' compliance with MS related code of conduct/ principles
	Specific KPIs in place
	Tracking KPIs (e.g. no. complaints made, no. trained on MS, etc)
	Company decisions informed by performance indicators
	Provides remedy & compensation to identified victims
6. Training	MS training to all employees
	Targetted to different groups within company
	Describes format of training
	Regular basis / refresher courses
	Developed with external stakeholders / experts

The assessments are for internal use only to help focus our efforts and guide supplier conversations, they are not published or shared with any party except for the suppliers' concerned. The assessment of the Statement does not form part of evaluation of any supplier during the tender process. Section 4 sets out how modern slavery and exploitation is dealt with as part of our procurement and commissioning activities.

Each of the criteria is given a score from 0-5, and each section is weighted according to its relative importance i.e., due diligence is weighted higher than details on policies. Contractor total scores are out of 156.

An assessment of the Modern Slavery Statement is just one measure that can be used to gauge the commitment suppliers have to tackling modern slavery in their business and supply chains.

Still, it is a good indicator of relative progress compared to counterparts within the sector and provides a useful starting point for ongoing discussions with the contractor as part of Supplier Relationship Management.

5 The effectiveness of our approach to modern slavery

5.1 Responding to modern slavery within the council's supply chains

As described in the previous section, Westminster City Council has embedded new processes as part of its new procurement and commissioning activities, which involves undertaking as much due diligence as practicable to avoid supply chain modern slavery risks in the first place. The council sets out expectations within our terms and conditions, as part of the selection of our direct suppliers i.e., before they are brought through to the tendering stage and on an ongoing basis before contractors source from third parties on our behalf. These activities are carried in line with the principles of proportionality according to the value of the contract, our relative leverage and the levels of risk associated with the goods, services or works and/or the sector.

The council does, however, recognise that these efforts alone do not guarantee risk-free supply chains. If modern slavery or exploitation is reported or identified in our supply chain, our strategic objectives of 'Victims Support' and 'Exploiters Brought to Justice' would be applicable. The council commits to undertaking the following in each circumstance set out below:

- If modern slavery were encountered within the workforce of direct contractors, and it was deemed that this crime was carried out knowingly or in the case that reasonable due diligence procedures were not being followed, P&CS would work with the Modern Slavery leads within the council to ensure that the victim(s)/survivor(s) were able to access support, the crimes were investigated, and every effort would be made to bring the exploiters to justice. Depending on the nature of the offence, this could involve interventions by the Metropolitan Police, National Crime Agency, Gangmaster & Labour Abuse Authority, internal fraud departments, Trading Standards, Department for Work & Pensions, HM Revenues & Customs, Adult Social Care, Family Services and/or specialist Non-Governmental Organisations (NGOs).
- As set out in our standard terms and conditions, Westminster City Council reserves the right to terminate contracts for offences under Modern Slavery Legislation, including without limitation where the offence has been committed by the contractor, or its staff, agents or subcontractors. However, suppose the council identifies a contract or supply chain within which modern slavery is found to have taken place, despite contractor implementing reasonable due diligence procedures. In that case, the council is committed to working with our direct contractor and relevant sub-contractors to identify the specific nature of the offence(s) and set out a clear plan to resolve the issues that have allowed the offence(s) to take place. The council would seek advice from expert partner organisations on the appropriate course of action, with a central focus on protecting the interest of the victim(s)/survivor(s) that have been exploited.

5.2 Progress made to increase modern slavery due diligence October 2022 – March 2023

The main areas of progress made over the last six months are summarised below:

- **Supply chain risk assessment** - A risk assessment was undertaken of our supply chain including the 56 live WCC contracts that are gold, silver or platinum rated, and over £1m in contract value. The total value of these contracts is c. £2.22billion out of a total of £2.88billion in total contracted spend i.e. we have risk assessed 77% of WCC's total contracted spend. The assessment was based on risk categories recommended by the Home Office including industry type, nature of the workforce, business/ supply chain model, supplier location, the context within which the supplier operates and commodity types. This assessment identified that 41 out of 56 of these contracts were at high risk of modern slavery and exploitation within the supply chain. These 41 contracts, delivered by 30 different contractors, have a total value of over £2 billion
- **Modern slavery statement assessment** - The next stage was for the 41 contracts deemed high risk to undergo a contract-specific assessment of modern slavery due diligence undertaken. We aimed to undertake a quantitative assessment of the quality of modern slavery statements published by the 30 contractors delivering these 41 contracts:
 - The MS statements of 23 contractors (delivering 34 high risk contracts) was assessed. These contracts total over £2 billion of contract value.
 - Of the 2.3% high risk suppliers that haven't had a modern slavery statement assessment done, 1.5% (3 contracts) fall below threshold to have an MS statement and 0.8% (4 contracts) have not yet been assessed.
 - Of the suppliers assessed, the highest score was 153/156 and the lowest score was 3/156. The average score was 78/156 (50%).
- **Supplier Charter and Ethical Procurement Policy** – At our RPC Strategy launch event in April 2023, we encouraged existing suppliers to sign up to our Supplier Charter and Ethical Procurement Policy, notwithstanding the fact they had no contractual obligation to do so. 9 of the 30 high risk suppliers have so far voluntarily signed up to these requirements. These suppliers deliver a total of £1.47billion worth of contracts i.e. 70% of our highest risk contracts.
- **Frameworks** - Managers of all frameworks within our existing register have now been interviewed about modern slavery selection and evaluation criteria used to procure the frameworks we use, and upcoming plans for increased modern slavery due diligence. Without exception, all frameworks incorporated a selection criterion requiring contractors within scope of the Modern Slavery Act (i.e. turning over £36m or more per annum) to have a modern slavery statement, however no further due diligence was required. This single intervention was deemed by the council to be too limited and therefore additional modern slavery due diligence requirements will need to be included in future framework call-offs, which will mostly tend to be part of the specification or scope of works. Another common theme was that all framework providers were willing to increase the robustness of their requirements if this was of interest to an increasing number of their clients.
- **Contract manager engagement** – All of the contract managers responsible for the 34 high risk contracts, which had supplier MS statements assessed, have been engaged with to:
 - Discuss the context and the scope of the contract, potential MS risks and the current relationship with the supplier.
 - Run through the results of the MS assessment of their contractors

- Identify relevant points of contact within the supplier organisation to work with on continuous due diligence improvements
- Set out data and evidence requirements to move forward on the creation of action plans with each supplier
- **Supplier engagement** – So far, only a small number of suppliers have been engaged with directly, this task will be one of the main focus areas in the coming months. Those suppliers that were prioritised included:
 - significantly large contracts with MS due diligence criteria built in that were starting to mobilise, e.g. community equipment,
 - particularly high-risk contracts e.g. waste collection
 - particularly poorly performing suppliers in respect of their MS statement quality i.e. a software services provider.

5.3 Continuous improvement over the coming year

Our action plan comprised of 12 indicators to measure progress on modern slavery due diligence in FY 23/24 is summarised in Section 6. For those indicators where work has already begun, actions to improve the quality of our delivery have been summarised below:

- **Indicator 1: Tailored contractual requirements** – This is one of the most robust ways of ensuring that suppliers understand the strength of commitment we have as a council to modern slavery due diligence, and the clearest way of communicating and enforcing required action and improvements in this area. Over the next year we aim to improve our approach by focusing on the following activities:
 - Collecting all interventions in a repository of specifications, selection, evaluation questions with summarised responses
 - Improving the guidance and training provided, including a wider range of examples for commercial managers on appropriate criteria according to spend categories and associated risks
 - Incorporating clearer and more robust criteria and lessons learned through collaborative working with suppliers
- **Indicator 2: Modern slavery statement assessment** – To ensure that high risk contracts have due diligence actions initiated at the correct time, we commit to:
 - Incorporating a modern slavery statement assessment as part of new ‘Gate 4’ governance procedures (post contract award, pre-contract commencement).
 - Recruiting additional responsible procurement resources and increasing expertise and training within Procurement & Commercial Services.
- **Indicator 5: Supplier Charter & Ethical Procurement Policy** - Monitoring and management of the delivery of requirements set out by the Supplier Charter must be initiated and awareness raised about adherence to the Ethical Procurement Policy:
 - A programme of systematic supplier engagement on responsible procurement, along with performance monitoring of other quality and commercial aspects will be rolled out in QTR 2 of FY 23/24. This will include encouraging existing suppliers to sign up voluntarily to the Supplier Charter and Ethical Procurement Policy.

- RPC requirements, including those set out within the Supplier Charter, Ethical Procurement Policy and others related to modern slavery, will be integrated into the Contract Management Framework and associated e-learning modules.
 - Requirements for Commercial Managers to set out which Supplier Charter criteria are incorporated into the tender are being incorporated into the refreshed 'Gate 2' governance form, which details procurement strategy, pre-tender. These requirements are passed on to contract managers before contract commencement to ensure the appropriate evidence is sought. Further training amongst commercial and contract managers will be rolled out to ensure compliance and consistency.
 - Training will also be provided on our new policy that all contract extensions, variations, direct awards and framework call offs must include Supplier Charter criteria within service specifications or other contractual requirements.
- **Indicator 4 and 7-11 - Contract manager and supplier engagement** – This is the most substantive piece of work that will take place this financial year. The programme of in-depth engagement will begin in QTR 2 of FY 23/24 following the refresh of our Contract Management Framework, which will include additional requirements for contract managers on responsible procurement, including modern slavery due diligence, as well as other enhanced aspects such as health and safety assurance. We will continue to work with contract managers who, without exception, have supported our approach so far, and will incorporate action plan milestones on modern slavery due diligence into BAU contract monitoring and management activities. Going forward, we will incorporate an initial risk assessment of each new contract as part of contract manager mobilisation actions set out in a refreshed Contract Management Framework. Increased support will be provided by Procurement & Commercial Services through the recruitment of additional responsible procurement resource and through training and knowledge sharing within Procurement & Commercial Services
 - **Indicator 12 - Frameworks** – Much more work needs to be done to assess the quality of due diligence undertaken by framework providers as they constitute a significant proportion of our contracted spend. Specific actions include:
 - Closer working with framework providers to communicate our expectations, increase transparency of initial checks undertaken and improve selection/award criteria as part of the initial creation of frameworks
 - Joint work with other London boroughs as part of the LRPN to strengthen our ask and aggregate our demand for increased due diligence during framework establishment.
 - Assessment of all currently used and viable framework providers to allow decisions to be made on what additional criteria need to be added into each to ensure a sufficiently robust approach to MS due diligence.

6. Action Plan on Westminster City Council Modern Slavery due diligence April 2023 – March 2024 onwards

Indicator	Date	Action	Measure	Expressed as a proportion of:
1	Ongoing	Continue to incorporate due diligence criteria into the specifications or scope of works of high-risk category tenders	% new, high-risk contracts with MS&E due diligence requirements integrated	WCC spend on new contracts from 'high risk' categories
2		Continue to assess the quality of Modern Slavery Statements of organisations delivering contracts from 'high risk' categories	% modern slavery statements assessed	a) new spend on high-risk contracts b) existing spend on high-risk contracts
3	April – Sept 2023	Incorporate Modern Slavery due diligence monitoring into the council's new Contract Management Framework (CRM) & guidance	All aspects of MS due diligence used in procurement are reflected in the CRM	n/a
4		Engage with Contract Managers and in collaboration, complete high level risk assessment of existing contracts	% contractors with high level risk assessment completed	WCC annual spend on existing contracts from 'high risk' categories
5		Facilitate the signing of the Supplier Charter into new contracts and use supplier relationship management to encourage voluntary signing by existing contractors	% suppliers signed up to Supplier Charter	WCC annual spend a) on contracts tendered after Supplier Charter introduction b) on existing contracts
6		Refresh and roll out MS training to all relevant staff including procurement, contract managers and commissioners.	% relevant staff trained	Total relevant staff
7	Sept 2023 – Dec 2023	Deliver briefings on our MS&E due diligence expectations to term contractors sourcing goods, services & works on WCC's behalf	% term contractors briefed on WCC's new approach to MS&E due diligence	total spend through term contractors sourcing high risk goods on WCC's behalf
8		Engage with contractors on modern slavery due diligence i.e., initiate cooperation with relevant points of contact on MS&E requirements/ asks within new/ existing contracts.	% high risk suppliers engaged with i.e., met with relevant point of contact at contractor organisation	WCC spend on suppliers engaged with a) as part of contract mobilisation b) through Supplier Relationships
9		Initiate supplier-led, detailed, contract specific risk assessment of supply chains providing products/ services/ works to WCC to identify risk hotspots and elements that require continuous improvement within action plan	% contracts in high-risk categories for which contractors have undertaken a detailed, contract-specific risk assessment	WCC spend a) on new contracts (as part of contractual requirements) b) on existing contracts (voluntarily)
10	January – March 2024	Support development of action plans by contractors i.e., translating results of risk assessments carried out into a clear, time-bound set of actions to mitigate these risks	% contracts with first action plan completed	contractors (by spend) with the commitment to develop an action plan a) As part of contractual requirements b) Voluntarily through SRM
11		Regular monitoring of contractor MS&E due diligence performance to ensure continuous improvement, including unannounced interviews with contractor workforce to assure pay and conditions	% contracts on track with action plan and/or no. contractor workforce interviewed	contractors completing their first action plan a) As part of contractual requirements b) Voluntarily through SRM
12		Roll out action plan with each framework provider: Determine if existing MS&E provisions are adequate, if not, establish additional requirements to be used in future e.g., within specifications	% frameworks on our register with MS&E due diligence criteria reviewed and improved where necessary	spend on frameworks that have been used by WCC in the last 18 months