

Westminster City Council Modern Slavery Statement 2023-2024

Foreword

Adam Hug
Leader of the Council



Protecting workers' rights and preventing modern slavery is one of the foundations upon which we can build a fairer economy, and pride ourselves in being a fairer council. The progress we are making on fair pay and treatment complements the work we are doing to clamp down on money laundering within the borough and encouraging responsible tax conduct amongst our supply chain. Over the last year we have continued to make significant progress in these important areas, but we will keep working with peers to learn and share best practice on achieving the best possible outcomes for supply chain workers.

Since the publication of last years' Modern Slavery Statement, Westminster City Council has launched a new Contract Management Framework, which has helped to standardise and improve our approach to contract management, including ensuring that suppliers are delivering against responsible procurement requirements. This framework, in conjunction with the introduction of our first e-contract management platform this year, will facilitate increased transparency on supplier performance and enhanced engagement and support of our contractors through supplier relationship management. This Statement, our third, sets out the progress 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.

Cllr David Boothroyd
Cabinet Member for Finance & Council Reform



Stuart Love
Chief Executive Officer



Westminster City Council's strong stance against discrimination of any kind encompasses our supply chain workers as well as our staff. Therefore, a key outcome of our [Fairer Westminster Strategy](#) is to ensure 'our procurement is responsible and ensures ethical treatment of people'. To achieve this and other sustainable development aims through our council's procurement activity, we developed our [Responsible Procurement and Commissioning Strategy](#). We are committed to doing everything we can to ensure fair pay and conditions for workers, even in the context of multi-tiered and global supply chains. We recognise that this is a complex challenge, especially with the emerging clean technology we need to deploy to meet our net zero carbon targets, but our leadership team is committed to continuing the strong progress we have made, and our staff are working with peers across the public, private and academic sectors to do so.

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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 2023 – 31 March 2024.

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.

To ensure that the council's approach to reducing human and labour rights risks is aligned with best practice in the public sector, the 'Self-Assessment Scorecard for Local Authorities' was used to benchmark current activities. This tool was funded by the Home Office and developed by leading non-profits Shiva Foundation, STOP THE TRAFFIK and Mekong Club in readiness for a broadening of legislation and on modern slavery to the public sector. This scorecard gives an indication of whether the local authority has taken 1) 'no action', is 2) 'developing' or 3) 'advancing' its approach, or 4) 'leading' other local authorities.

Though recognising improvements must be made in areas such as supplier audit protocols, the sum of this year's activities has led to Westminster City Council being rated as 'Leading' by the tool; a significant step forward from last year's rating of 'Advancing'.

An action plan setting out 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 how our performance will be measured.

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 labour¹. There are an estimated 100,000 victims/survivors of modern slavery in the UK².

UK Local authorities have a duty to notify the Secretary of State of any individuals they believe are a potential victim of modern slavery or human trafficking. This duty is completed through referrals to the [National Referral Mechanism \(NRM\)](#), the UK government's process for identifying and supporting potential victims of modern slavery. Only certain organisations can refer people to the NRM, they are known as 'First Responder Organisations' and include the local authority, police, Home Office and some charities. Children do not need to consent to be referred to the NRM, however adults must provide consent.

A total of 17,004 referrals were made for potential victims to the NRM in the UK in 2023, the highest number since the NRM was established. From January to December 2023 Westminster City Council completed 25 NRMs for adults and children who were potential victims of modern slavery.

If an adult does not consent to enter the NRM, the local authority has a 'Duty to Notify' the Secretary of State they have encountered a potential case of modern slavery. This process is similar to the NRM but with no identifiable information being shared, and no support offered to the victim/survivor. Between January and December 2023, three 'Duty to Notify' for potential victims of modern slavery were completed, where the individual did not consent to an NRM.

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

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

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.

Modern Slavery (Transparency in Supply Chains) Bill

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 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 publishes its Modern Slavery Statement annually in readiness for this change in law and to demonstrate our ongoing commitment to tackling modern slavery.

Economic Activity of Public Bodies (overseas matters) Bill

This Bill makes the provision that public entities, such as councils, cannot engage in advocacy, boycotts, divestment efforts or sanctions, targeting specific geographic locations, unless aligned with official policy endorsed by national government. This legislation is presently under review by committee in the House of Lords.

The provisions of this Bill are broadly similar to World Trade Organisation framework agreements, which the UK already is party to. Westminster City Council's approach will therefore remain the same if the Bill is enacted i.e. using more robust due diligence measures when sourcing from locations where modern slavery is recognised to be more prevalent; unless and until UK foreign policy changes to allow boycotting of such regions.

The Procurement Act 2023

The Procurement Act 2023, part of the Government's Transforming Public Procurement Programme (TPP) will come into force on 28 October 2024.

The procurement regulations have been amended to make certain modern slavery offences under the Act as grounds for the mandatory exclusion of bidders from public procurements. A centralised debarment list is also being established. When the Act comes into force later this year, the council will therefore be permitted to debar suppliers, based on the following parameters:

- Not performing to Westminster City Council standards
- Serious breaches of contract
- A court judgment confirming a sufficiently serious breach

Procurement Policy Note (PPN) 02/23 – Tackling Modern Slavery in Government Supply Chains

Also this PPN is voluntary for local authorities such as Westminster City Council, the procurement approach the council takes is fully aligned to the guidance it sets out. In summary, this includes:

- Understanding supply chain risks of modern slavery
- Identifying and managing risks in new procurements
- Managing risks in existing contracts
- Taking action when victims of modern slavery are identified
- Training on modern slavery

2 Organisational structure and supply chains

2.1 Westminster City Council:

The City of Westminster is home to just over 211,365 residents, with an additional approximately 865,000 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 2800 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 two boroughs, in conjunction with other key strategic partners.
- **Executive Director of Finance and Resources:** Responsible for the council's finance, property investment, strategy and intelligence, IT (Information and Technology) and digital transformation services as well as the council's corporate property department.

- **Executive Director of Environment and Communities** : Responsible for the environment, climate and public protection services within the council, which includes city highways, parking, public protection and licensing, communities, waste and cleansing, and the climate emergency team.
- **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.
- **Executive Director of Regeneration, Economy and Planning**: Responsible for delivering regeneration and other housing schemes and also manages the Planning department and economic development, including the employment and skills function.
- **Executive Director of Corporate Services** Responsible for HR, culture development, policy making and communications. This role works across Westminster City Council and Kensington and Chelsea Councils, and also acts as principal legal adviser to both.
- **Strategic Director for Housing and Commercial Partnerships**: Responsible for support residents and others in all aspects of their housing journey. This includes managing estates, supporting vulnerable residents, preventing homelessness and delivering outreach services for rough sleepers in partnership with a range of external providers. This role also has responsibility for Commercial Partnerships which oversees the corporate fulfilment of contracts and the procurement process for the council, ensuring the responsible commissioning of contracts and adherence to procurement regulations.

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.

- **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. As of November 2023, an additional full time employee joined the Responsible Procurement team whose principle role is to ensure modern slavery due diligence criteria is incorporated into all high risk tenders and to provide support to suppliers with developing and implementing action plans to ensure continuous improvement in modern slavery due diligence.
- **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.
- **Buying Team:** Our new buying team was launched in January 2024 to expand the current services provided by the Procurement and Commercial Services Team. This team is tasked with requesting quotations and tendering for services and products within the £25,000 to £100,000 range. This team’s objectives include increasing the number of local, SME and minority-led business in our supply chain, and incorporating responsible procurement criteria to ensure that modern slavery, social value and environmental aspects are included in all relevant contracts.

2.2 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

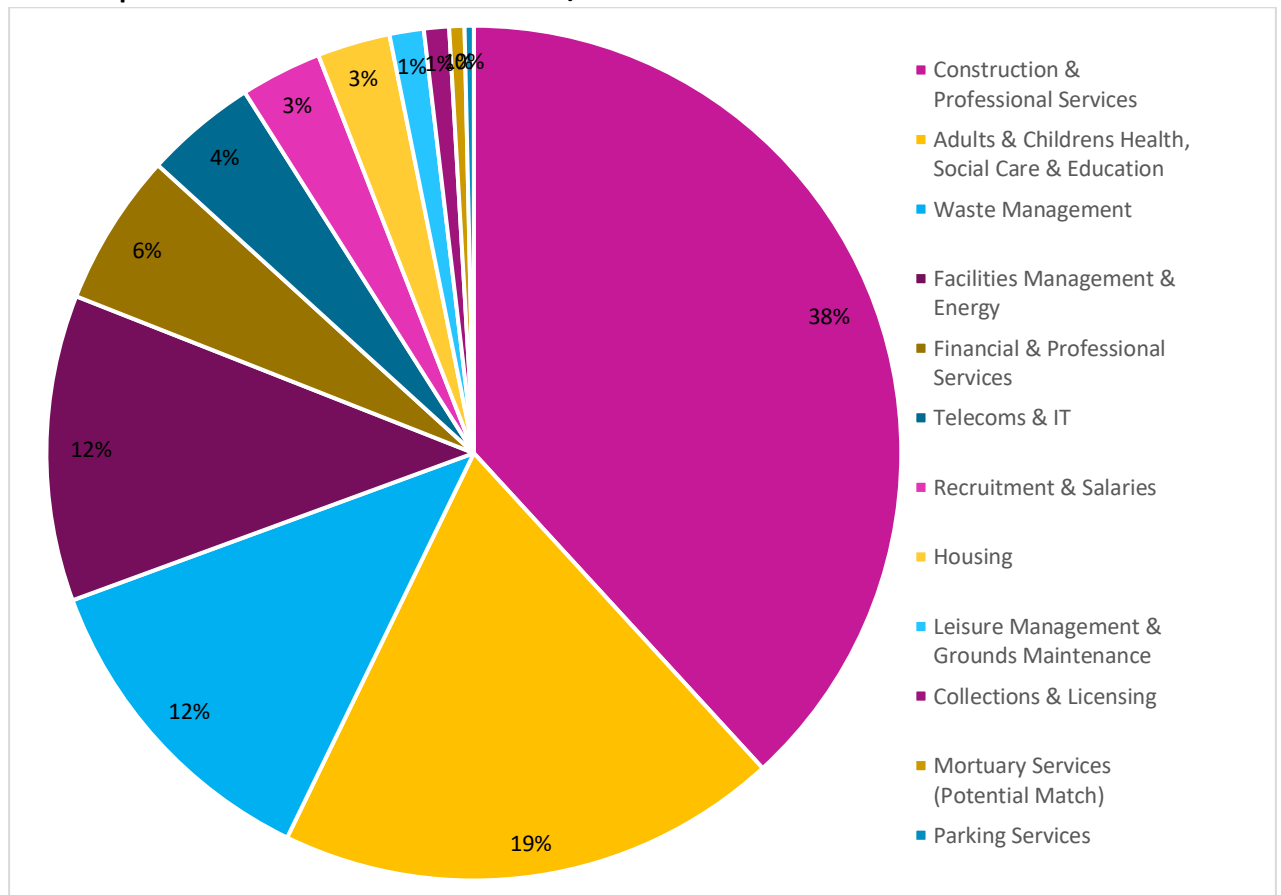
key stages, to provide assurance to Executive Directors and Cabinet Members responsible for making decisions.

- 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.

2.3 Spend Profile and risk prioritisation:

Last year, Westminster City Council spent over £700 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 2023/24



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, based on five pillars: Fairer Environment, Fairer Communities, Fairer Economy, Fairer Housing and Fairer Council. The latest update Delivery Plan and Progress Report was published in March 2023, setting out specific council goals on modern slavery for 2024-2025. They include:

- Ensure our procurement policies prioritise ethical treatment and consider environmental impacts, promoting responsible practices.
- Increase our efforts to identify and address modern slavery risks within our business and supply chains

This Modern Slavery Statement and Action Plan align with the delivery of these objectives. Progress is reported on internally on a quarterly basis and externally on an annual basis as part of the Fairer Westminster Delivery Plans and our Modern Slavery Statement annual updates.

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. Between 1 April 2023 – 31st March 2024 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 2023 was £14.76, which is significantly higher than the recommended London Living Wage rate of £13.15. Our apprentice staff are also paid above the London Living Wage, which goes above and beyond the Living Wage Foundation's requirements for accredited organisations.
- **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 £757 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.

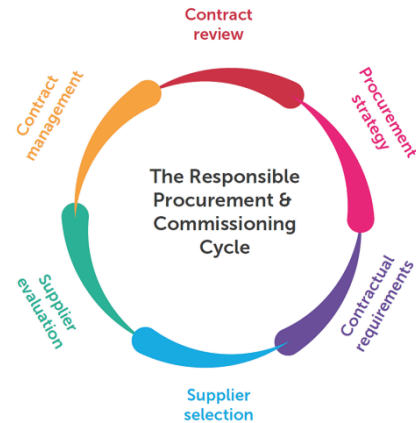
Procurement & Commercial Service has a responsible procurement function who oversees the council's approach to achieving social value, diversity and inclusion, environmental sustainability and ethical sourcing through its procurement and commissioning activities and leads on projects to make continuous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

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.

Mid 2024 will see the launch of the Responsible Procurement Report within this report will sit a section on Westminster City Councils actions to mitigate modern slavery.



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 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. The aim was then strengthened to work towards an increase of a minimum 20-30% by 2025/26 for those contracts with high leverage, value, risk and/or opportunity.

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.
 - November 2023 saw the launch of the council's new Contract Management Framework. The refresh of this procedural guidance was developed to ensure a standardised and more rigorous approach that Contract Managers could follow to ensure best practice. The council's contract management function is devolved, but Contract Managers are required to submit contract management plans including risk mitigation techniques and supplier performance indicators so that the centralised Procurement and Commercial Services function can have oversight of all contractual activity, and provide this to senior leaders. Reviews of the Contract Management Plans submitted identified the need for the Responsible Procurement team to be involved in follow-up support meetings to ensure an understanding of implementation of areas such as social value delivery, carbon reduction and modern slavery due diligence; this work started in March and will be ongoing until all higher risk Contract Managers have been supported.
 - Configuration of the council's new e-Contract Management Platform began this financial year and will go live in July 2024. This is the first such platform developed and used by the council and will facilitate compliance with the new Procurement Act, which comes into force in late October 2024, allowing the council to report externally on supplier performance against the KPIs associated with our largest contracts. The platform will be used internally to facilitate transparency of supplier performance not only at a

contractual level as part of the 'Contract Scorecard', but at a supplier level with the 'Supplier Scorecard'. Each Contract Scorecard includes responsible procurement as a performance category, with more specific performance indicators sitting below, so that performance within and across contracts can be scrutinised. As many of our contractors have multiple contracts with the council, the Supplier Scorecard can be used to assess performance at an organisational level and this also includes responsible procurement measures as set out in our Supplier Charter. It includes elements such as supplier prompt payment, sustainability actions and milestones expected on modern slavery due diligence.

Frameworks, direct awards and contract extensions:

- The council's Tendering Policy includes 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.

4.2 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.

In 2022 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

4.3 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 enhanced due diligence procedures 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.).

4.4 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/genderbreakdown)
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.

Each criterion 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.

6 A Self-Assessment Scorecard and Supporting Guidance for Local Authorities

6.1 Introduction

Upon review and assessment of the Modern slavery statements of our top 80 suppliers, it was noted that the highest scoring statements set out organisational approaches that were benchmarked against externally developed frameworks, allowing an objective evaluation of their performance. Consequently, Westminster City Council opted to align itself with the most robust tool available to councils; the Home Office-funded 'Self-Assessment Scorecard and Supporting Guidance for Local Authorities' jointly created by the *Shiva Foundation*, *The Mekong Club* and *STOP THE TRAFFIK*.

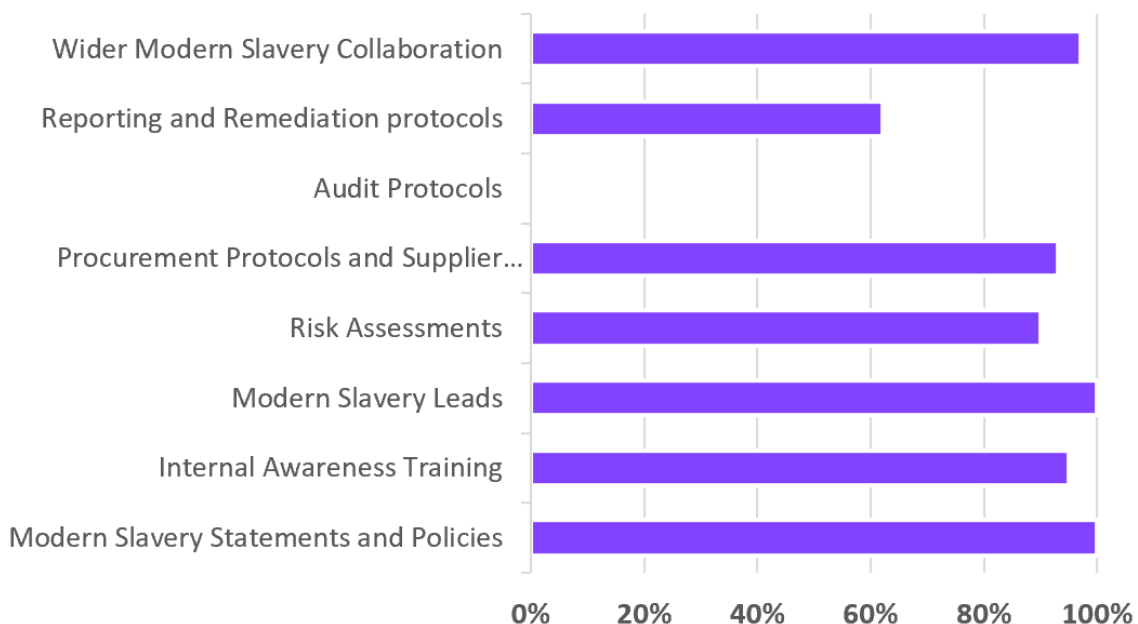
Undertaking the self-assessment involves completing an online form consisting of key thematic areas listed below. Upon completion, the Council received a score out of 400, along with a 'level of change' rating. There are four levels of change, which include: **No action, Developing, Advancing, and Leading**. This process highlighted the overall modern slavery risks and will serve as a guide for continuous improvement. The categories are as follows:

1. Modern Slavery Statements and Policies
2. Internal Awareness Training
3. Modern Slavery Leads
4. Risk Assessments
5. Procurement Protocols and Supplier Engagement
6. Audit Protocols
7. Reporting and Remediation protocols
8. Wider Modern Slavery Collaboration

Last year, the Council informally undertook the assessment and received a score of 247. When the assessment was retaken this year the score was 314 placing the Council in the **Leader** category. It is recognised that there are still improvements to make, particularly regarding audit protocols. The framework will act as the foundation for action undertaken by Westminster City Council in the following year.

Westminster City Council's self-assessment score breakdown:

A Self-Assessment Scorecard



5.2 Scorecard Categories

Modern Slavery Statements and Policies

This category examines if Westminster has a publicly available modern slavery statement that covers, the following: recruitment, labour rights abuses, procurement, supply chains, and reporting and remediation practices both within the organisation and its suppliers. It requires a framework for continuous improvement and ongoing strategy. This section also included questions on addressing the following areas: day-to-day operations, the level of involvement of senior leadership, and who signs off on the statement. The second section of this category examines what policies are currently in place to address modern slavery risks.

Westminster was defined as LEADING in this category

Westminster City Council has input and sign off from both Executive Directors and Councillors. The Supplier Charter and Ethical Procurement Policy are Westminster's cornerstone procurement mechanisms to address modern slavery. At the time of writing, the signatories account for 43% of Westminster overall spend. Furthermore, all newly engrossed contracts falling within the parameters set, sign the Supplier Charter and Ethical Procurement Policy as part of the procurement process. Additionally, the ethical procurement policy has now been integrated into all Westminster standard terms and conditions for contracts of £100,000+. Additionally, the Ethical Procurement Policy is embedded into direct award and framework specifications. This covers the following:

- Fundamental human and labour rights
- Employment, contractual and working conditions
- Freedom of association and collective bargaining
- Working hours and regular employment, including zero hours contracts
- Humane treatment, equalities, and blacklisting
- Living Wage

To ensure that the Supplier Charter is applied consistently across all direct award contracts, we have embedded the charter into specifications. However, this process was not fully integrated into the tendering process, resulting in some contracts being overlooked. To address this issue, we have planned a training session with the Commercial and Tendering team to ensure best practice going forward. As signing the Supplier Charter is voluntary, we will utilise strategic sessions highlighted below to increase sign up.

Internal Awareness Training

This category addresses Westminster's training practices to ensure that modern slavery expectations and policies are met. This section requires that staff and suppliers must be trained on modern slavery, relating to procurement and supply chain management. It is recommended that training sessions are facilitated by modern slavery leaders.

This section also includes questions on addressing the following areas: what is covered in the training, the number of people trained in the organization and if the knowledge is regularly tested.

Westminster was defined as LEADING in this category

To aid with overall awareness and to support the effective cascading of knowledge, modern slavery toolkits are being developed specifically for procurement colleagues. These toolkits will offer practical guidance and actionable steps tailored to their roles and responsibilities within tendering process. With these toolkits, procurement colleagues will have access to essential resources designed to enhance their understanding of modern slavery risks. Initially the tool kits will be produced for high-risk sectors. These include construction, waste, security, hospitality, agriculture, janitorial, logistics & transport, health & social care.

A standard practice is that all new starters within the procurement team are given responsible procurement training, this training will cover the basics of responsible procurement and will cover an introduction to modern slavery, which will include, current legislation, reporting requirements and general risk overview.

Westminster has secured funding from our partners to develop and roll out more training. The team are currently establishing the exact nature of this training in terms of what will be most relevant and impactful for recipients.

The work we will continue doing includes the below; but is not limited to:

- Maintaining responsible procurement training for all new starters
- Continuing to develop toolkits and adjust according to emerging risks and challenges
- Continuing to assess internal knowledge gaps and create and deliver training accordingly

In 2023, the Head of Responsible Procurement presented training to the Housing department's 'Strategic Alliance Core Group', a group comprised of seven key contractors that are considered key to Westminster strategy. The presentation provided an overview about the Supplier Charter and Ethical Procurement Policy and how it was applicable to their business models and relationship with Westminster City Council.

Furthermore, training on responsible procurement, including the Supplier Charter and the Ethical Procurement Policy has been developed for contract managers and will take place in the first quarter of 2024. The training will occur over two hour-long sessions and will aim to reach around 100 participants through the online Contract Management Forum. It will detail how responsible procurement is integrated into the tendering process and equip Contract Managers with the knowledge and tools necessary to effectively navigate their role in meeting responsible procurement KPI's.

Modern Slavery Leads

This category requires having a point of contact for whom tackling modern slavery is a core part of their role. This allows for best practice and encourages better communication across the organisation. This point of contact should be made known to staff and provided with the resources and training required for this role.

Westminster was defined as LEADING in this category

Following the launch of the Responsible Procurement Commissioning strategy (RPC) in April 2023, it became clear that additional expertise on modern slavery was required. As result, a resource with specialist knowledge was recruited and started in the role in November 2023. The remit of this role includes but is not limited to incorporating due diligence criteria into the specifications or scope of works for all high-risk category tenders, conducting risk assessments of suppliers and sectors, engaging with suppliers on modern slavery, conducting overall modern slavery due diligence, and fostering collaboration with other local authorities, businesses, and community organizations.

Since the last statement, due diligence criteria has been developed and included for each relevant procurement. The level of this is dependent on the sector, contract duration and spend. For example, in any tendering activity that requires a large amount of recruitment, a significant emphasis would be placed on the due diligence of the recruitment agencies. The questions and specifications would focus on the due diligence surrounding labour providers, this could involve ensuring compliance with right-to-work legislation, authenticity of sector appropriate documentation, and robust vetting of the recruitment agencies.

Furthermore, to ensure comprehensive oversight on all current live procurements, several processes were established to facilitate effective communication between the Responsible Procurement team and the procurement team at large. A key accomplishment is that these processes have resulted in eighty- nine percent of all high-risk tenders for high-risk contracts (over 100k) include modern slavery due diligence criteria. The eleven percent are those where the tendering process began prior to the RPC launch. With regards to the eleven percent, we will aim to work with the suppliers to but include them retrospectively.

Risk Assessments

This category reviews Westminster's risk assessment process when working with its suppliers. This involves identifying high risk areas, identifying those suppliers with whom you have the greatest leverage and targeting responses accordingly.

This section also includes questions on addressing the following areas: how we identify key risks, how we interact with suppliers, and our internal processes on risks assessment.

Westminster was defined as LEADING in this category

Continuing our ongoing efforts, we continuously assess the modern slavery statements of high-risk contracts. Westminster defines high-risk as 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 and/or suppliers sourcing high risk products e.g., food, construction materials, electronic equipment, other manufactured products e.g., textiles, PPE & medical supplier. Other high risk areas are also considered such as food, pest control, recycling picking. These high-risk areas are identified by using external sources such as external reports on modern slavery, country sourcing information, NGO and charities, and academic research and tools.

Key statistics are as follows:

- o The MS statements of 50 contractors have been assessed.
- o Of the suppliers assessed, the highest score was 154/156 and the lowest score was 3/156. The average score was 67/156

In addition, to statement risk assessment, we will launch our strategic supplier sessions. In these sessions we will engage directly with the supplier representatives to build a comprehensive understanding of the supplier risk and approach to modern slavery. This could potentially involve but is not limited to, reviewing documentation, and conducting site visits or inspections when necessary. The goal is to identify any potential risks, gaps, or areas for improvement within the supplier's operations and work collaboratively to address them. The suppliers that have been identified for these supplier strategic sessions are both high risk and high spend. Where relevant additional suppliers will be identified these could include:

- Low Spend but high-risk contracts e.g. waste collection.
- Particularly poorly performing suppliers in respect of their MS statement
- An outcome from our conversation with Contract Managers

To maximise the effectiveness of the strategic sessions, several stages of background work need to be conducted. In advance of meeting with any supplier, a pre-engagement plan should be developed which pre-assesses the supplier in several areas, including overall sector risks and a review of their current modern slavery approach. The Pre-engagement phase also involves various stakeholders including Contract Managers to best understand the relationship.

In summer 2024 will also see the launch of the new eSourcing and eContract management platform. The Modern Slavery assessment score will be recorded within this platform and will contribute to a supplier scorecard. This comprehensive scorecard will contain additional metrics related to modern slavery, all of which will be integrated to formulate the supplier's overall performance score.

There is planned improvement to strengthen the assessment of modern slavery risk at product level and work more closely with suppliers who procure products on our behalf. The SRM team and the Responsible Procurement plan to collaborate to develop standard specifications.

Procurement Protocols and Supplier Engagement

This category explores how engagement with suppliers during the procurement process was but also once they are in contract. This section also includes questions on what steps we take to ensure that suppliers are examining the modern slavery risks within their own supply chain.

Westminster was defined as LEADING in this category

Beyond the strategic sessions with suppliers, this was an internal drive to improve supplier engagement across the organisation. For this reason, a new Contract Management Framework was launched in October 2023. The new framework now includes a responsible procurement section which incorporates consideration for modern slavery. The contract management plan serves as a tool for Contract Managers to effectively assess and oversee the delivery of their contracts including the

responsible procurement commitments and supports effective supplier engagement and responsible procurement KPI's in the contracts they manage. Upon reviewing the plans, meetings were arranged with Contract Managers to further support them and conduct initial high level risk assessments of existing contracts. Points discussed at these meetings include:

- The context and the scope of the contract and the current relationship with the supplier
- Potential Modern Slavery Risks
- Identification of KPI's and supporting the contract manager in delivering them.

For the next statement we will continue to work with Contract Managers and maintain this level of engagement addressing any knowledge gaps when identified. It is worth noting that an initial challenge with this indicator is that Contract Managers are not a centralised function and therefore a proportion of the work was to identify Contract Managers across the organisation.

To further support supplier engagement and aid the above there has also been the introduction of the contract management oversight board.

Audit Protocols

In this category Westminster's approach is assessed on how they audit their suppliers. This auditing can involve such as questionnaires, management interviews, scheduled site visits, surprise site visits and worker interviews. This section asked Westminster to indicate the methods it uses to ensure all employees to effectively audit its suppliers.

Westminster was defined as NO ACTION in this category.

Part of this category is captured by the strategic sessions; however, improvement is needed in this area. An intended outcome of the strategic sessions is the development of an action plan. The aim of this is to audit against the commitments of the action plan and where necessary audit using one of the following methods: questionnaires, worker interviews, and site visits.

Reporting and Remediation protocols

This category details Westminster's approach on if all employees, inclusive of any subcontracted labour, across the organisation and supply chain should have access to the tools safely highlight any possible concerns related to modern slavery.

Westminster was defined as ADVANCING in this category.

This section asked Westminster to demonstrate the various pathways that both directly and indirectly employed staff report on modern slavery, it also asked on details on Westminster's remediation approach.

As stated in the initial section of this statement, Westminster City Council has a whistle blowing policy and associated channels of escalation. As of April 2023 – 31st March 2024 there were no concerns about potential risks of modern slavery raised through whistleblowing channels.

However, a national trend of adults being exploited in the care sector was recognised by the anti-slavery sector across the UK. The charity, Unseen, who run the Modern Slavery & Exploitation Helpline, noted a [606% increase from 2021 to 2022](#) of contacts regarding exploitation in the care sector. The Helpline noted 712 potential victims of exploitation in the care sector in 2022. Westminster City Council commission services to provide care for adults across the Borough, therefore there was a need to develop local knowledge of the issue. Westminster and Kensington and Chelsea's Safeguarding Adults Executive Board held a webinar in a bid to raise awareness of modern slavery in the care sector. The online event included speakers from the Metropolitan Police and Citizens Advice who provided information about the exploitation trend, the experiences of people in the care sector through a [Citizens Advice report](#), and how to respond to concerns when identified. The event was attended by Commissioners from the council, care providers, social workers and other professionals across the two boroughs.

A [briefing](#) was produced for the Safeguarding Adults Executive Board to increase awareness and encourage reporting. Although no instances of exploitation in the care sector have currently been identified in Westminster, an increased awareness and confidence in identification should contribute towards a more robust response if concerns were encountered.

Wider Modern Slavery Collaboration

This section required Westminster to highlight any broader modern slavery initiatives and efforts that drive significant progress or effect change. This could be inclusive of any initiatives with other local authorities, public sector, business, and community organisations.

Westminster was defined as LEADING in this category

One initial area of broader collaboration involves the work we intend to undertake is with frameworks. For certain procurements, the procurement team opt to use certain public procurement frameworks, these frameworks are widely used within the public sector to ensure efficient, transparent, and cost-effective procurement practices, however, a majority of these framework have limited modern slavery due diligence. Therefore, initial discussions have begun with key framework providers to gain a deeper insight into their modern slavery processes. This has resulted in a deeper understanding of what would motivate further due diligence. The next stage involves engaging with the London Responsible Procurement Network (LRPN), a collective comprised of local authorities and public procurement bodies.

An additional instance of collaboration is our collective on solar technology supply chains. With global temperatures rising and the consequences of climate change being increasingly felt, a shift towards sustainable energy, particularly solar technology is needed. Whilst ramping up our use of renewable energy is a vital step toward tackling climate change, Westminster City Council recognises the modern slavery risks surrounding this transition. The solar technology supply chain is particularly at risk of forced labour due to the challenges of sourcing the raw material 'polysilicon', as reports indicate that forced labour may be involved in its production in the XUAR region.

To mitigate this risk and to help ensure a 'just transition' in the roll out of future solar energy installations across our estate, Westminster City Council jointly funded and contributed to a guide to ['Addressing Modern Slavery and Labour Exploitation in Solar PV Supply Chains'](#) in 2023. This

procurement guidance *Action Sustainability - Procurement Guidance*. This guidance was produced with fifteen other funding partners with the sustainability consultancy Action Sustainability leading. The aim of the guidance was to highlight Modern Slavery risks within the supply chain, detailing the best practice risk mitigation and due diligence.

Westminster Council continuous improvement going forward

The council commits to building on all progress made to date to continuously improve our modern slavery due diligence processes. A summary of the principles we will follow include:

- Quality assuring and making any necessary improvements to processes we already have in place
- Supporting council staff to understand the most impactful measures to reduce the risk of modern slavery and exploitation in their areas of work
- Using the council's new eSourcing & eContract Management platform and Strategic Supplier Relationship Management to gain a deeper understanding of supplier performance, and support suppliers to identify risk and mitigate it throughout their supply chains
- Benchmarking our performance against recognised external assessment frameworks
- Collaborating with peers to aid continuous improvement across London and the wider public sector

More specifically, we will undertake the work set out in our Action Plan below and will measure and report on our performance next financial year.

Action Plan on Westminster City Council Modern Slavery due diligence April 2024 – March 2025

	QTR	Action	Measure
1	Ongoing	Facilitate the signing of the Supplier Charter into new contracts and use supplier relationship management to encourage voluntary signing by existing contractors	% contractors delivering high risk contracts signed up to Supplier Charter from top 80% council spend
2	QTR 1 – 4 starting with highest spend, highest risk contracts	Continue to assess the quality of Modern Slavery Statements of organisations delivering contracts from ‘high risk’ categories	% modern slavery statements assessed across top 80% council spend
3		Engage with contract managers and contractors on modern slavery due diligence through strategic SRM programme i.e. provide initial benchmark with MS statement feedback, highlight high level risks associated with sector	% contractors/associated CMs delivering high risk contracts within the council’s top 80% spend
4		Support development of action plans by contractors i.e. identifying specific risks associated with WCC’s contract(s) and formation of an action plan to mitigate these risks	% high risk contracts within top 80% spend with first action plan completed
5		Quarterly monitoring of contractor action plan delivery – auditing supplier performance against the action plans	% high risk contracts within top 80% spend with action plan on track
6		QTR 1	More detailed guidance on modern slavery due diligence incorporated into the council’s Contract Management Framework and new e-contract management platform
7	QTR 1 ongoing	Establish and meet regularly with peers from across London boroughs and subject matter experts to share learning and create case studies	Quarterly meetings held
8	QTR2	Develop sector specific modern slavery toolkits with guidance on risk key factors	% high risk sectors with toolkit developed
9	QTR 2 ongoing	Refresh and continue to roll out MS training to all relevant staff including procurement, contract managers and commissioners.	% relevant staff trained (all procurement colleagues, all contract managers/ commissioners of high-risk contracts)
10	QTR 3	Establish a standard specification for tenders in high-risk categories with tailored and robust due diligence criteria.	% new, high-risk contracts with MS&E due diligence requirements integrated from beginning QTR 3 onwards (October 2024)
11	QTR 3-4	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	% live frameworks used over the last 18 months with M&E due diligence criteria reviewed and improved where necessary
12	QTR 4	Establish improved pathways for direct and indirect employees to report modern slavery concerns.	Action consulted with relevant stakeholders, completed, and disseminated
13	QTR 4	Develop and disseminate reporting and remediation policy detailing what will done in the instance that a modern slavery concern involving contractors or supply chain businesses is raised with procurement	