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# UK Parliament Modern Slavery Statement

2020/2021



This statement covers the steps taken by the UK Parliament to understand all potential modern slavery risks related to our business and to implement steps to prevent slavery and human trafficking between 1 April 2020 – 31 March 2021. We have set ourselves goals at the end of this statement and we will update on progress in our next statement in 2022.

This statement will ensure that the public understand the steps we have taken to prevent modern slavery in our supply chains.

We have worked with the specialists on our Modern Slavery Advisory Group to inform the content of this statement, as well as self-assessing against the Ethical Trading Initiative's [evaluation framework](#) for modern slavery statements.

This is the UK Parliament's first Modern Slavery Statement and we will build on this year on year. We welcome constructive feedback on our statement and the work we are carrying out. If you would like to share feedback, please email [modernslaveryinfo@parliament.uk](mailto:modernslaveryinfo@parliament.uk).

# Contents

Foreword	4
<b>SECTION 1:</b>	
<hr/>	
Structure, Business and Supply Chains	5
<b>SECTION 2:</b>	
<hr/>	
Policies in relation to Modern Slavery	10
<b>SECTION 3:</b>	
<hr/>	
Risk Assessment and Due Diligence	14
<b>SECTION 4:</b>	
<hr/>	
Training and Awareness	18
<b>SECTION 5:</b>	
<hr/>	
Goals and Key Performance Indicators (KPIs)	20

# Foreword

At the UK Parliament we are committed to tackling modern slavery. We fully support the government's objectives to eradicate modern slavery and human trafficking. We are taking steps to ensure that there is no place for such abuse in our workforce and through our supply chains.

Evidence tells us that there are around 40 million global victims of modern slavery. Modern slavery is pervasive. It is therefore incumbent on public bodies to take a proactive approach to identify and mitigate the risk in our supply chains of goods and services.

At the UK Parliament we believe that everyone has a right to be treated with dignity and respect. Our Behaviour Code ensures that everyone working for Parliament, at Westminster or elsewhere, is responsible for Parliament meeting the highest ethical standards of integrity, courtesy and mutual respect.

Both Houses are committed to ensuring that our practices are fair and inclusive, and that the wellbeing of all of our colleagues, including our contractors and suppliers, is central to the work we carry out. This work is one part of that.

Parliament is committed to ensuring that taxpayers' money does not inadvertently fund this criminal activity and is committed to protecting vulnerable workers in its own supply chains from exploitation or harm.

We are taking a zero tolerance approach to modern slavery and human trafficking, and all forms of corruption and bribery associated with these criminal acts. To make this a reality, we know that we need to take action to identify the prevalence and mitigate the risk of modern slavery in our supply chains.

This work was identified as a priority by Sir Lindsay Hoyle on his appointment as Speaker of the House of Commons and carried forward by Frank Field MP who, upon his introduction to the House of Lords, continues to champion this cause. It is recognised by the Speakers of both Houses as a significant area of importance for Parliament.

Parliament's Modern Slavery Programme was therefore initiated in 2020 to drive forward our commitment to tackling modern slavery. The programme focuses on a range of development areas, including updating procurement processes, training, awareness raising and due diligence activity.

Under this programme over the last year we have started to make progress and have put some solid foundations in place to help us tackle modern slavery.

We are still at an early stage of this journey. However, we are committed to taking the steps we need to make real progress towards the ultimate goal: to provide a fair and inclusive working environment for everyone involved in delivering Parliament's work and services, both directly within our organisation and within our supply chains.

Legally, the UK Parliament is not required to produce an annual modern slavery statement. However, we have chosen to do so as this aligns to the values of both Houses, our commitments to diversity and inclusion, and because it is the right thing to do. This statement will help focus our efforts and ensure we are fully transparent in our approach each year.



**Rt Hon Sir  
Lindsay Hoyle MP**

The Speaker of the  
House of Commons



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

The Lord Speaker

## SECTION 1:

# Structure, Business and Supply Chains

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This section explains the structure of the UK Parliament, sets out our governance arrangements for preventing modern slavery in our supply chains and highlights the breadth of our supply base.

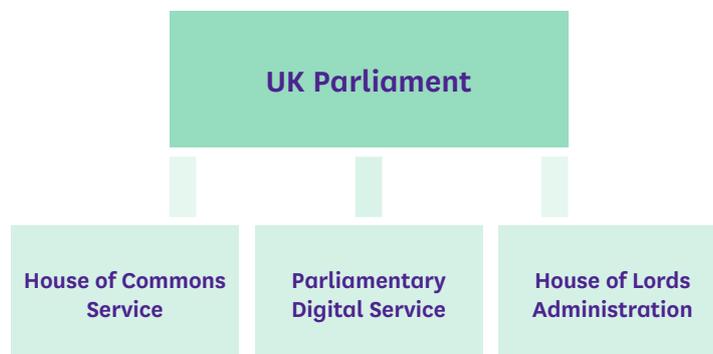
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# Overview of the UK Parliament structure

The UK Parliament consists of the House of Commons, the House of Lords and the Parliamentary Digital Service.

Parliament relies on the work of thousands of members of staff. There are a wide variety of job roles and functions across the House of Commons, House of Lords and Parliamentary Digital Service that contribute to the running of Parliament.

The Parliamentary Procurement and Commercial Service (PPCS) is a shared service, operated on behalf of both Houses by the House of Lords.



## Facts and Figures on UK Parliament spending<sup>1, 2</sup>



1 Supplier and contract data in this statement covers the financial year 1 April 2020 to 31 March 2021.

2 Approximate spend figures cover the financial year 1 April 2019 to 31 March 2020 and have been used for illustrative purposes. The House of Commons and House of Lords 2020/21 annual accounts will be made available [here](#) and [here](#), and will provide accurate figures for the 2020/21 financial year.

3 Approximate annual spend on goods, services and capital works.

# Organisational structure to mitigate modern slavery

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Parliament's Modern Slavery Programme was established in 2020 to drive forward our commitment to tackling modern slavery in the organisation and our supply chains. The In-House Services and Estates Director of Operations currently has overall responsibility for the Modern Slavery Programme.

A Modern Slavery Working Group has been set up to oversee the programme. The working group is a consultative forum which includes colleagues from Procurement, as well as the Diversity & Inclusion (D&I) and Human Resources teams in both Houses.

The House of Commons Diversity and Inclusion Strategy 2019-2022 includes an action to develop and implement a UK Parliament (bicameral) programme focusing on modern slavery in the supply chain. This provides additional accountability for the Modern Slavery Programme, with progress reported to the House of Commons D&I Steering Group on a quarterly basis. This work also links to the House of Lords Focus on Inclusion Strategy 2019-2021, which includes an action on training and running spot checks for the supply chain.

The UK Parliament also has representation on the cross-government Modern Slavery and Procurement Implementation Group, which has representatives from commercial teams from across government.

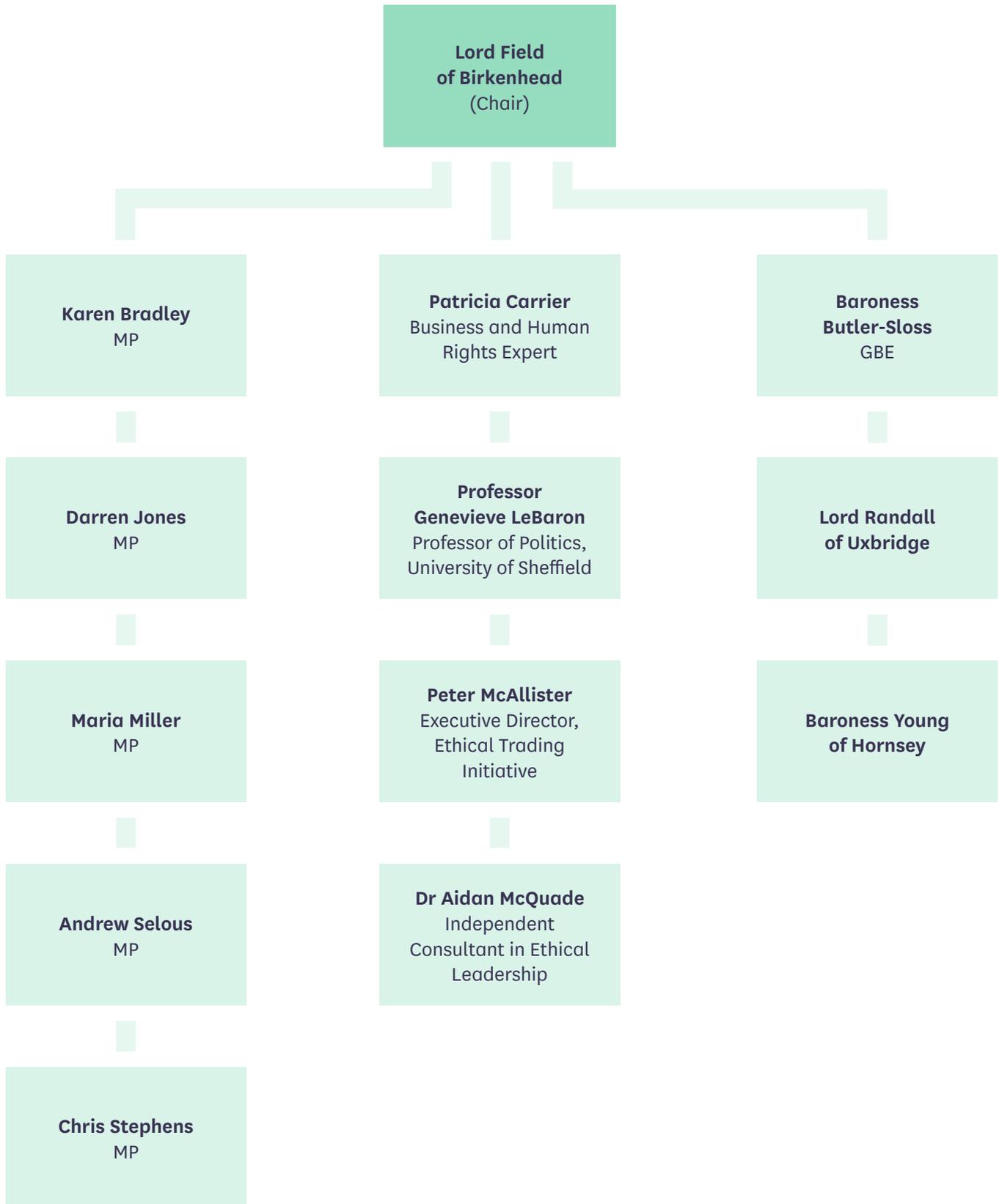
## Management Board Anti-Slavery Advocates

The House of Commons Executive Board and the House of Lords Management Board have both nominated board level Anti-Slavery Advocates - the Managing Director of In-House Services and Estates for the House of Commons and the Director of Facilities for the House of Lords. They are visible advocates for anti-slavery and the work of Parliament's Modern Slavery Programme, including raising awareness of the programme and our commitment to tackling modern slavery and ensuring that Parliament delivers on its commitments with regards to the Modern Slavery Programme.

## Advisory Group on Modern Slavery and the Supply Chain

We have set up a new external advisory group to provide a forum for consultation and sharing of best practice to inform key areas of Parliament's Modern Slavery Programme. The group is chaired by Lord Field of Birkenhead and comprises Members of both Houses from across political parties, as well as a number of specialists on modern slavery and ethical business.

# Membership of Parliament's Advisory Group on Modern Slavery



# Our supply chains

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The UK Parliament buys a large range of goods and services, from construction and design to food and facilities management. The UK Parliament has 704 contracts in place, 480 suppliers and 246 contract managers managing contracts across the organisation<sup>4</sup>.

The UK Parliament spends approximately £197 million buying goods and services and £348 million on capital works projects and programmes, from our direct (tier 1) suppliers<sup>5</sup>. Whilst a large number of our tier 1 suppliers are registered in the UK, many of their operations and supply chains are global. Some of our suppliers have complex supply chains with multiple tiers of sub-contracting, meaning it is more difficult to establish the origin of many of the products we receive. We are prioritising steps to achieve greater supply chain visibility, taking a targeted approach to focus on the areas of highest risk and worker vulnerability.

Over the last year, we have developed our early due diligence activity, which we are currently trialling with a number of our suppliers. In

developing this, we have taken into account the latest research and evidence about modern slavery, including the importance of commercial practices in shaping supply chain dynamics. One of our priorities moving forward is to carry out supply chain mapping of a number of our high-risk supply chains and collect data on suppliers beyond the tier 1 level. By increasing the visibility of our high-risk supply chains, we will gain a better understanding of how and where to target our future due diligence activity.

We aim to develop our supplier relationship strategy in the future. Our expectation is that major first tier companies will take a proactive and transparent stance with respect to modern slavery, in line with Parliament's requirements and the Modern Slavery Act, however for our smaller suppliers we may take a more active role in assessing risk in the first instance. The length of the contract will also need to be considered with regards to the development of supplier relationships and how far we are able to work with them to mitigate labour related issues.

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<sup>4</sup> Supplier and contract data accurate at 31 March 2021.

<sup>5</sup> Approximate spend figures are from the House of Commons and House of Lords annual accounts for the 2019/20 financial year. The annual accounts for the 2020/21 financial year will be made available [here](#) and [here](#), and will provide accurate figures for the 2020/21 financial year.

## SECTION 2:

# Policies in relation to Modern Slavery

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This section is about the UK Parliament's policies to prevent modern slavery in our operations and supply chains.

During the last year, we have developed a Modern Slavery and Human Trafficking Policy which provides a framework to implement action in relation to modern slavery.

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# UK Parliament Modern Slavery and Human Trafficking Policy

In the last 12 months, we have developed a [UK Parliament Modern Slavery and Human Trafficking Policy](#), which has been endorsed by the House of Commons Executive Board and the House of Lords Management Board. The policy was reviewed by Parliament's Advisory Group on Modern Slavery and the Supply Chain.

The policy sets out that Parliament has adopted a zero tolerance approach to modern slavery, human trafficking and all forms of corruption and bribery, directly and indirectly, associated with these criminal acts. While no such abuse is tolerated, we recognise that an open and transparent approach is required by Parliament and our suppliers, to ensure we take steps to identify and tackle any instances of modern slavery in our supply chains.

## **The policy provides a framework to ensure:**

- All members of the Parliamentary Community understand and are aware of their responsibilities in relation to modern slavery.
- The development of a strategic approach to identifying, mitigating and tackling any modern slavery within Parliament's supply chains.
- The implementation of robust, transparent and proportionate governance and assurance processes.
- Reporting and remediation of instances or concerns of modern slavery.

The policy will be reviewed and updated annually to reflect progression of our programme of work and any changes in modern slavery best practice. This will be informed by assessing any emerging case law and best practice, benchmarking Parliament's activities against statements and action plans undertaken by similar public and private organisations and re-evaluating the risk of non-compliance as part of our annual risk management and assurance processes.

The policy will be published on the UK Parliament website and will be communicated to all staff regularly. The policy will also be shared with all suppliers via targeted communications, and to new and potential suppliers by referencing it in the Invitation to Tender documents and in our Standard Contract Terms and Conditions.

In developing our policy, we have taken into account research and data, including an approach to ensuring robust and meaningful due diligence, rather than creating a box-ticking exercise.

## UK Parliament Behaviour Code

The UK Parliament Behaviour Code outlines clear guidelines on how people should be treated, and how they should treat others. These apply to everyone who visits and works for Parliament.

This includes respecting and valuing everyone, zero tolerance of bullying, harassment and sexual misconduct, ensuring Parliament meets the highest ethical standards of integrity, courtesy and mutual respect, and speaking up about any unacceptable behaviours.

## Guidance for Procurement and Commercial Professionals (PPN 05/19)

In September 2019, the Cabinet Office published guidance setting out action to identify and mitigate modern slavery risks throughout the commercial life cycle, from defining contract requirements and procuring goods, to managing supplier relationships and remediation where exploitation has been uncovered. The guide was produced primarily for government procurement and commercial practitioners; however, it contains guidance that can be applied to any organisation in the public sector.

We have used this guidance to aid the development of our modern slavery policy and processes so far, ensuring we take a risk-based approach to tackling modern slavery in the supply chain. We will continue to use this guidance where relevant in the development of our Modern Slavery Programme.

# Other relevant policies

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## Whistleblowing Policies

At the UK Parliament, we treat malpractice or impropriety very seriously. It is very important that everyone is encouraged and feels supported in speaking up about their concerns and we aim to provide a culture where everyone feels confident to do so.

Both Houses have policies for employees to disclose malpractice or impropriety (known as ‘Whistleblowing’).

**These procedures provide a means of dealing with issues of malpractice or impropriety such as:**

- criminal activity, for instance fraud, corruption, bribery or blackmail
- abuse of office or position
- failure to comply with any legal duty
- a miscarriage of justice (or deliberate and serious misrepresentation of information)
- endangering the health and safety of an individual or groups of individuals, including risks to the public
- environmental damage
- any deliberate attempt by any person to conceal any of the above.

## Safeguarding Policy

There is also a Safeguarding Policy in place to ensure we are providing a safe environment to children, young people and vulnerable adults, both during visits to the Parliamentary Estate and when our staff engage with them in the community.

The policy ensures that all adults who work for or on behalf of the UK Parliament, including those adults who use the facilities provided on site or undertake work within the wider community, are clear about their responsibility to safeguard and promote the wellbeing of all children and vulnerable adults who visit the Parliamentary Estate, whenever and wherever they are in a position to do so. It also ensures that both Houses act in accordance with the relevant legislation and statutory guidance for the protection of children and vulnerable adults and that all working practices are regularly reviewed from a safeguarding perspective to ensure that the welfare and safety of children and vulnerable adults is not compromised.

We are reviewing the potential link between these policies and the Modern Slavery and Human Trafficking Policy and will reflect any interdependencies as part of the planned annual policy review.

## SECTION 3:

# Risk Assessment and Due Diligence

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This section describes the modern slavery due diligence we have undertaken. This section also details our understanding of the most significant modern slavery risks in our supply chains and where we want to prioritise action.

During the last year we started our modern slavery due diligence activity by carrying out a risk assessment, identifying our high-risk suppliers and inviting them to participate by using the Modern Slavery Assessment Tool (MSAT).

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## Supplier mapping and risk assessment

We began our due diligence activity with a mapping exercise to bring together details of all our tier 1 suppliers. We carried out a risk assessment of our suppliers, taking into account value and size of contract, services provided, business models, operating context and the nature and location of work. It is recognised there may be a particular risk to the UK Parliament of exploited workers engaged in the construction, maintenance and servicing of its facilities, especially where these functions are outsourced to third-party suppliers.

This risk assessment identified 94 high-risk suppliers, consisting of 22 suppliers of contracts worth £5 million and above, and 72 suppliers of contracts worth between £1 million and £5 million or other high-risk contracts (such as cleaning, catering and maintenance contracts).

## Modern Slavery Assessment Tool

We invited all 94 of our high-risk suppliers to complete the Modern Slavery Assessment Tool (MSAT), a modern slavery risk identification and management tool, produced by the Government, for public bodies to use with their suppliers. The tool gives suppliers tailored good practice recommendations to improve their anti-slavery

activity, from how they conduct risk assessments to ensuring their due diligence helps prevent debt bondage.

MSAT can provide an individual supplier with up to 35 tailored recommendations based on the six themes in the Home Office's modern slavery guidance.

As of 31 March 2021, 43% of the invited suppliers have completed the MSAT. This includes 17 of our suppliers of contracts worth £5 million and above. The aggregate value of contracts held by these 17 suppliers is currently £381 million (excluding VAT)<sup>6</sup>.

Across these suppliers, MSAT provided recommendations focussing largely on due diligence, key performance indicators, risk assessment and training. The MSAT results suggested our higher risk suppliers are performing better in the areas of policy/procedures and governance.

We will use this information to inform how we work with our supply chain moving forward and where there may be particular areas we need to address or support.

We will also target efforts to ensure completion of the MSAT by the remaining suppliers identified as high-risk.

Suppliers identified as high-risk will be invited to complete MSAT annually and we aim to monitor the implementation of their MSAT recommendations.

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<sup>6</sup> Approximate figure accurate at 31 March 2021.

## Supplier terms and conditions

We have carried out work to significantly strengthen our supplier terms and conditions. We have developed a more detailed and robust set of modern slavery clauses to include in all supplier contracts. The updated clauses will be included in all new contracts and will also be considered for inclusion, where possible, in existing contracts on renewal.

### **Our modern slavery clauses stipulate that:**

- Suppliers must ensure their supply chains are compliant with the law including the annual reporting requirements where relevant (as defined by section 54 of the Modern Slavery Act) and the UK Parliament Modern Slavery & Human Trafficking Policy.
- Suppliers must notify us of any previous or current investigations or convictions related to modern slavery and will notify us immediately if any suspected issues or breaches arise.
- Suppliers are required to cooperate extensively with any investigations/audits we undertake.
- Suppliers must produce an action plan for approval to remedy any issues if we request it.
- Suppliers must complete any questionnaires/surveys regarding modern slavery within a specified timeframe (e.g. The Modern Slavery Assessment Tool).

- Any breaches, where the supplier does not take steps to resolve the situation, entitle Parliament to withhold/reduce payments, terminate the contract or request that a subcontractor/specified persons be removed from the supply chain if necessary, provided steps have been taken to ensure workers are not harmed as a result.
- Suppliers will implement appropriate due diligence procedures to tackle and mitigate the risk of slavery or human trafficking in their supply chain.

## Escalation and remediation

In our communications so far, we have signposted staff to the Modern Slavery Helpline. We are keen to also develop an internal reporting route. We are working with experts in this area to understand the particular issues we may need to consider, and we aim to develop an escalation and remediation strategy informed by best practice.

If we become aware of any allegations of human trafficking or slavery activities against any of our suppliers, we will take appropriate action depending on the nature of the incident. This may include engaging with the supplier to ensure they investigate the issue, accessing victim support to protect any modern slavery victims and reporting it to the authorities where appropriate.

# Responsible Purchasing Practices

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The UK Parliament recognises its purchasing power and the impact our own purchasing practices can have on the conditions of workers in supply chains. We have a Sustainable Procurement Policy in place and both Houses of Parliament are accredited London Living Wage Employers.

We are exploring how to further optimise our purchasing practices to address the root causes of modern slavery in our supply chains.

## Sustainable Procurement Policy

The UK Parliament has a Sustainable Procurement Policy which aims to ensure that sustainability objectives agreed by one or both Houses are implemented when running procurements and managing contracts.

### These objectives include:

- The supplier understands the importance to Parliament of and practices equal opportunities, inclusivity and diversity in relation to staff performing our contracts.
- The staff concerned with providing the goods and services work in conditions that are beneficial to their welfare.
- Consideration will be given to whether there is a competitive market in which to purchase Fair Trade products.

## Living Wage

Both Houses of Parliament are accredited by Citizens UK as London Living Wage Employers. As a condition of contracting with the UK Parliament, contractors and their sub-contractors are required to pay all personnel assigned to the contract the current London Living Wage where the contractor has dedicated personnel working on the UK Parliament premises or providing services to Parliament from another location in London.

Additionally, where the House of Commons contracts on its own<sup>7</sup> and for joint Lords and Commons contracts, suppliers and sub-contractors which provide services from outside of London must pay their dedicated personnel at least the UK Living Wage.

The Parliamentary Procurement and Commercial Service (PPCS) monitors compliance with these conditions of contract. Further details are available in the General Terms and Conditions of both Houses<sup>8</sup>.

We aim to carry out work to further explore the living wage, particularly regarding payment to subcontractors and outsourced workers, and to improve onsite awareness about the application of the living wage and how suspected breaches can be reported.

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7 Each House is a separate legal entity and it may contract on its own or jointly with the other depending on the requirement.

8 General Terms and Conditions are available on the UK Parliament [website](#).

## SECTION 4:

# Training and Awareness

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This section describes the progress we have made with modern slavery training and awareness raising activity.

During the last year, we have started our awareness raising activity, including initial staff communications, holding a targeted modern slavery session at our supplier summit, and developing an initial training plan.

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## Training

We have started to develop a modern slavery training plan by mapping out our key learning outcomes. We have identified our main audience groups as all staff, contract managers and commercial staff, Members of Parliament and Peers, and those responsible for responding to instances of modern slavery.

Our intention is to begin to roll out training within the organisation over the next year. Our initial focus will be on contract managers, procurement staff and commercial staff, because of their responsibility in helping to prevent modern slavery in supply chains.

## Supplier engagement

In December 2020, the In-House Services and Estates Team hosted its first online supplier summit, to present the In-House Services and Estates vision and values to its supply chain partners. A total of 72 of our tier 1 suppliers were in attendance.

The summit included a session on modern slavery, providing an introduction to the issue and an overview of Parliament's programme of work. Suppliers were encouraged to follow our lead and use some of our early work as a case study for their own activity.

We have also carried out supplier engagement as part of our Modern Slavery Assessment Tool campaign.

## Awareness raising

We have worked with the Communications Teams in both Houses to develop an initial communications plan, focused on both internal and public communications, to enable us to start raising awareness about modern slavery and the work we are doing to tackle it.

We have published initial communications to all staff to highlight Parliament's Modern Slavery Programme and our commitment in the fight against modern slavery. This also included an overview of what modern slavery is and how colleagues can seek advice and support.

A series of communications are being planned to take place later in 2021 and will include further detail about the issue of modern slavery, how to spot the signs and encouraging workers to report any experience or suspicions of modern slavery.

There has been early engagement with our Workplace Equality Networks to raise awareness of modern slavery and our programme of work. They were invited to review the UK Parliament Modern Slavery and Human Trafficking Policy and the accompanying equality analysis. We will carry out further engagement with the Workplace Equality Networks and their members moving forward, to develop wider awareness and understanding of the issue and available support routes.

## SECTION 5:

# Goals and Key Performance Indicators (KPIs)

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This section provides information on our work on KPIs and outlines our goals for the next financial year as part of our efforts to continuously improve how we protect workers from exploitation.

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## Management Information

During the early stages of our Modern Slavery Programme we have focused primarily on collecting targeted management information relating to Parliament's work on modern slavery.

### **Our early management information measures are:**

- Total number of suppliers to complete the Modern Slavery Assessment Tool.
- Number of suppliers of contracts valued at £5 million and above to have completed the Modern Slavery Assessment Tool.
- Number of suppliers of contracts valued between £1 million and £5 million to have completed the Modern Slavery Assessment Tool.
- Number of other high-risk category suppliers to have completed the Modern Slavery Assessment Tool.
- Number of suppliers we have delivered a modern slavery session to (as part of a supplier summit or equivalent).
- Total number of suppliers we have engaged with regarding modern slavery activity (via all mediums).

As the programme develops, it is anticipated that these measures will be converted into key performance indicators. We will also add further measures as our work progresses, for example, regarding the provision and impact of modern slavery training.

Our aim is to develop a full KPI framework in order to set the pace of (and drive, rather than simply track) performance in relation to modern slavery.

## Next steps for 2021-2022

In 2021, our strategic focus will be on developing our due diligence structure and processes to better mitigate the risk of modern slavery in our supply chains. We will also have a focus on training and awareness raising to ensure our workforce understand the risks presented by modern slavery, how to spot the signs and where to report any suspicions.

Delivery against the goals in this statement will be monitored by the Modern Slavery Working Group. The areas below will be incorporated into our KPI framework to help us monitor delivery of these outcomes.

**We will continue to build capability across the organisation, particularly in commercial and procurement roles, so that our staff understand what steps they should be taking to prevent modern slavery in our supply chains. To achieve this, in 2021/22 we will:**

- Make all staff aware of the Modern Slavery and Human Trafficking Policy.
- Roll out training for commercial staff and contract managers.
- Develop a training offer for all staff to increase understanding about modern slavery, including how to spot the signs and how to report any instances or suspicions.
- Identify and deliver bespoke training for those involved in responding to any incidents of modern slavery.
- Deliver a suite of awareness raising communications to all staff, including newsletters, online, posters and at team meetings.
- Deliver a second modern slavery session at the 2021 supplier summit.

**We will strengthen our risk identification and due diligence measures. To achieve this, in 2021/22 we will:**

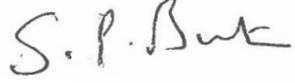
- Consider the latest research and evidence about the root causes of forced labour in supply chains.
- Strengthen our network of supply chain intelligence and work with modern slavery and forced labour experts on bespoke due diligence audits.
- Engage with providers and carry out deep dive activity in some of the areas we have identified as high risk (for example, construction, maintenance and servicing of facilities).
- Carry out further analysis of supplier MSAT submissions, to better understand how and where we may wish to develop our risk assessment processes.
- Implement the [Social Value Procurement Model](#), including evaluation criteria on modern slavery. This model takes account of the additional social benefits that can be achieved in the delivery of contracts.
- Develop and implement a Modern Slavery Escalation and Remediation Strategy.
- Develop a modern slavery KPI framework.
- Gather lessons learned and ensure transparency regarding emerging risks, any instances of modern slavery that may be identified and any remediation measures that are implemented.

This statement has been approved by the House of Commons Executive Board and the House of Lords Management Board. This statement was approved in June 2021, for the financial year ending 31 March 2021.

Signed:   
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Date: 30 June 2021  
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**Signed by Dr John Benger,**  
the Clerk of the House of Commons,  
for the House of Commons Service.

Signed:   
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Date: 30 June 2021  
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**Signed by Simon Burton,**  
the Clerk of the Parliaments,  
for the House of Lords Administration.

