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# UK Parliament Modern Slavery Statement

2021/2022



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# Foreword

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At the UK Parliament we are committed to tackling modern slavery. At least 40.3 million people are estimated to be trapped in modern slavery around the world, though the true number is thought to be much higher. The International Labour Organisation claims that almost 25 million people are thought to be caught in the grip of forced labour, the majority of whom are working in the private economy.

The public sector has a crucial role to play in the fight against modern slavery, with public procurement representing a significant share of the global economy. Given the pervasiveness of this crime, it is essential for public bodies to identify and mitigate the risk of modern slavery in the supply chains of their goods and services.

At the UK Parliament, we have adopted a proactive approach to mitigating modern slavery and all forms of corruption and bribery associated with these criminal acts. We are taking considerable steps to ensure that there is no place for such abuse anywhere in our workforce or supply chains. We are committed to ensuring that taxpayers' money does not inadvertently fund this crime.

We believe that everyone has a right to be treated with dignity and 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 integral to the work we do.

This work was identified as a priority by Sir Lindsay Hoyle on his appointment as Speaker of the House of Commons and is recognised by both Mr Speaker and the Lord Speaker as a significant area of importance for Parliament.

Parliament's Modern Slavery Programme was implemented in 2020 as part of our commitment to tackling modern slavery. As part of this work, we published our first ever Modern Slavery Statement last year, which outlined Parliament's commitment and efforts with regards to preventing modern slavery. One year on, we have made significant strides in this area; raising awareness of modern slavery across our workforce, training parliamentary staff on how to spot the signs of exploitation, and refreshing our approach to supply chain risk management.

This year's statement reflects on our evolving programme of work and highlights our ambitions for the future. The statement also showcases the key partnerships we have made to strengthen our response to modern slavery as well as acknowledging some of the challenges we have faced in the past year.

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

Our statement demonstrates our commitment to maximising transparency, by giving the public a full understanding of the steps we have taken to prevent modern slavery in our supply chains. We recognise that we still have some way to go, however we will not stop until we are confident that vulnerable people are protected from exploitation and are treated with the dignity and respect they deserve.



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

A handwritten signature in blue ink, appearing to read 'Lindsay Hoyle'.



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

A handwritten signature in blue ink, appearing to read 'John'.

# Executive Summary

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This statement details the steps that the UK Parliament has taken between 1 April 2021 and 31 March 2022 to mitigate and prevent modern slavery risk within our business operations and supply chains.

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

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

## Progress update

The UK Parliament's [Modern Slavery Statement 2020/2021](#) identified 14 goals for the 2021/2022 financial year. Below, we provide a snapshot summary of our progress against these goals, including explanations in cases where goals were adjusted or postponed to align with a change in approach. This summary provides a brief progress update on the Modern Slavery Programme for ease of reference.

### Goal 1

Make all staff aware of the Modern Slavery and Human Trafficking Policy

In the past year, we have raised awareness of the policy across Parliament, utilising a mixed media approach to suit all audiences. This has included the following:

- Ensuring the policy is accessible to all colleagues by hosting it on the UK Parliament website, staff intranet and SharePoint Hub.
- Promotion of the policy in a variety of newsletters across Parliament, as well as at a range of staff meetings, including department wide meetings and Workplace Equality Networks.
- Signposting to the policy at all modern slavery training sessions.
- Promotion of the policy in an 'Introduction to Modern Slavery' podcast episode, featuring Andrew Selous MP and Baroness Young of Hornsey.

### Goal 2

Roll out training for commercial staff and contract managers

We have developed, tested and implemented a bespoke commercial training offer for all contract managers, focusing on their unique responsibility to mitigate modern slavery in the supply chain. As of 31 March 2022, we delivered six sessions, training 32% of contract managers in total.

### Goal 3

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

We also developed and implemented an all-staff 'Introduction to Modern Slavery' bitesize session, to deepen the understanding across Parliament with regards to the topic of modern slavery. As of 31 March 2022, we trained 75 staff members through these sessions.

## Goal 4

Identify and deliver bespoke training for those involved in responding to any incidents of modern slavery

In March 2022, an external partner, [Slave Free Alliance](#), was procured to develop a modern slavery escalation and remediation procedure. As part of the project, Slave Free Alliance will provide specialist training for responding to modern slavery incidents. This project will be completed by the end of 2022.

## Goal 5

Deliver a suite of awareness raising communications to all staff, including newsletters, online, posters and at team meetings

In alignment with goal 1, we have delivered a suite of awareness raising communications to inform parliamentary staff about our Modern Slavery Programme, including the Modern Slavery and Human Trafficking Policy.

## Goal 6

Deliver a second modern slavery session at the 2021 supplier summit

At our 2021 supplier summit, suppliers were provided with an update on the work of Parliament's Modern Slavery Programme and plans for future supplier engagement.

## Goal 7

Consider the latest research and evidence about the root causes of forced labour in supply chains

Throughout the year we have created numerous opportunities to account for the latest research and evidence on forced labour. The Advisory Group on Modern Slavery and the Supply Chain regularly invited subject matter experts to speak on related topics, such as:

- The Living Wage as a protective mechanism against forced labour
- The [ETI Human Rights Due Diligence Framework](#)
- Best practice approaches to anti-slavery in large corporations

## Goal 8

Strengthen our network of supply chain intelligence and work with modern slavery and forced labour experts on bespoke due diligence audits

We have been delivering on the first phase of this work, through the mapping and engagement of our Tier 1 suppliers. This began with a supply chain risk assessment in 2020/21, which asked a selection of high-risk suppliers to complete the Modern Slavery Assessment Tool (MSAT) <sup>1</sup>. The purpose of this mapping exercise is to build supply chain capability, develop relationships and gain buy-in to support future work in this area. Once this has been achieved, we plan to carry out vertical supply chain mapping (to gain visibility of suppliers beyond Tier 1) and due diligence audits.

This year we have been refreshing our approach to supplier engagement. As part of this we reworked the segmentation of Parliament's suppliers according to their risk level. Once the pool of high-risk suppliers has been updated, we will invite them to complete the MSAT. In the future (see the next steps for 2022/23 section at the end of the statement), we aim to analyse the results of these new MSAT submissions to steer our supplier engagement approach and help us prioritise which due diligence audits to carry out first.

## Goal 9

Engage with providers and carry out deep dive activity in some of the areas we have identified as high-risk

Due to the priority work to refresh the segmentation of our high-risk suppliers, the plans to initiate some deep dive activities were postponed. Within the next year, we will utilise new MSAT submissions to steer how we approach deep dives into higher-risk areas of the supply chain.

This approach will create visibility beyond Tier 1 where it is most needed, fostering a more risk-based approach for our future deep dive work.

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1 In 2020/21 we asked 94 high-risk suppliers to complete the MSAT, 46% of whom have completed it.

## Goal 10

Carry out further analysis of supplier MSAT submissions, to better understand how and where we may wish to develop our risk assessment processes

This goal has been postponed whilst work is being carried out to update the pool of high-risk suppliers to be prioritised for MSAT completion. Once this pool of suppliers have participated, we will analyse the results and establish where further risk mitigation work is needed.

## Goal 11

Implement the Social Value Procurement Model, including evaluation criteria on modern slavery

We have started work on implementation of the Social Value Model<sup>2</sup>. Our initial focus is on developing a suitable approach for Parliament before we implement this later in the year. Relevant key stakeholders have been engaged, including via a newly formed Social Sustainability Working Group, and mapping of processes has begun.

## Goal 12

Develop and implement a Modern Slavery Escalation and Remediation Strategy

Slave Free Alliance has been procured to help us develop an escalation and remediation procedure and approach. This project will be completed by the end of 2022 and reported on in next year's Modern Slavery Statement.

## Goal 13

Develop a modern slavery KPI framework

A KPI framework was established in March 2022 to measure our effectiveness in mitigating the risk of modern slavery. See our KPI framework in section 6 for more detail.

## Goal 14

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

In 2021, we discovered that there had been a possible incident of forced labour in one of our supply chains. We were alerted to the fact that some of the disposable gloves on the Parliamentary Estate were linked to a company accused of using forced labour in its factories in Malaysia. The UK Parliament purchases gloves from a Tier 1 supplier who had been procuring these gloves.

This incident encouraged us to reconsider Personal Protective Equipment (PPE) as a high-risk area and initiated wider conversations about how to prevent such instances from happening across the supply chain. In addition, the work we are carrying out to develop a formal escalation and remediation procedure will increase our ability to deal with potential future incidents in the supply chain.

In section 4 of this statement, we reflect on the lessons we learnt from this incident and outline the specific remediation steps we have taken. We also highlight PPE as a high-risk area for Parliament's procurement, examining some of the factors that enable forced labour to take place in the sector.

**We have set ourselves goals at the end of this statement for 2022/23, many of which build on the progress made against last year's goals.**

<sup>2</sup> This model takes account of the additional social benefits that can be achieved in the delivery of contracts.

## SECTION 1

# Structure, Business and Supply Chains

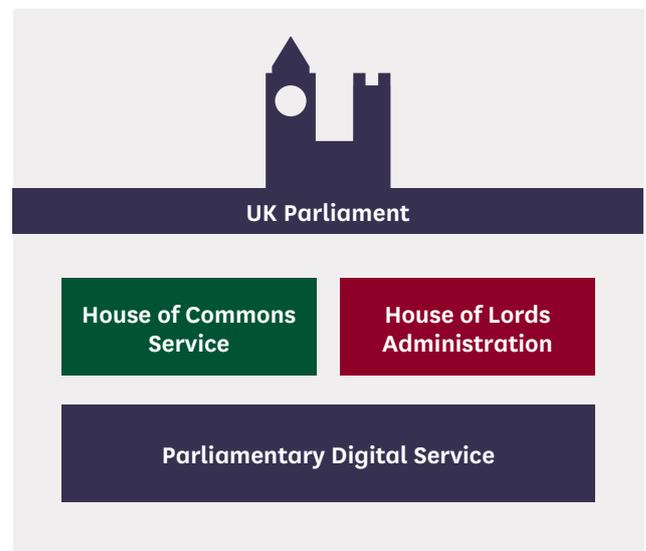
This section outlines the structure of the UK Parliament and explains our internal governance arrangements for modern slavery mitigation and prevention. It also demonstrates the breadth of our supply base, providing some approximate facts and figures on UK Parliament spending.

## Overview of the UK Parliament

### Structure of Parliament

The UK Parliament workforce consists of the House of Commons Service, the House of Lords Administration and the Parliamentary Digital Service (PDS). Our workforce comprises a diverse skill set and demography, which contributes to the running of Parliament. The House of Commons and House of Lords are separate employers and PDS works as a joint department serving both Houses.

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



### Parliament's procurement functions

The Parliamentary Procurement and Commercial Service (PPCS) is responsible for procurement processes conducted in the House of Lords, the House of Commons and PDS.

It provides professional procurement and commercial services and ensures compliance with the procurement policies of both Houses. Separate supply chain teams operate alongside PPCS in numerous departments, who focus on procurement functions

relevant to departmental needs. Parliament operates a deployed model for contract management, which allows for relevant staff in a position of responsibility to manage commercial contracts. All contract managers are required to undergo specific training on the procurement policies, as well as being invited to carry out bespoke training on modern slavery. The responsibility for the management and performance of each contract ultimately sits with the contract manager.

## Summary of supply chains

The UK Parliament buys a large range of goods and services, from construction and design to food and facilities management to hardware and digital services.

Parliament has 732 contracts in place, 448 suppliers and 267 contract managers managing contracts across the organisation.

Parliament spends approximately £192 million buying goods and services and £253 million on capital works projects and programmes, from our direct (Tier 1) suppliers, the majority of which are UK-based<sup>3</sup>. We are aware that many of our suppliers have complex supply chains with multiple tiers in other countries. We are therefore prioritising steps to increase our supply chain visibility. Please see section 3 for our planned approach to this.

## Facts and Figures on UK Parliament spending<sup>4</sup>



<sup>3</sup> Approximate spend figures cover the financial year 1 April 2020 to 31 March 2021 and have been used for illustrative purposes. The House of Commons and House of Lords 2021/22 annual accounts will be made available [here](#) and [here](#), and will provide accurate figures for the 2021/22 financial year.

<sup>4</sup> Employee, supplier and contract data in this statement covers the financial year 1 April 2021 to 31 March 2022.

<sup>†</sup> Approximate annual spend on goods, services and capital works.

# Internal governance of anti-slavery work

## Governance

**Parliament's Modern Slavery Programme was established in 2020. The In House Services and Estates Director of Operations has overall responsibility for the Modern Slavery Programme and the programme ultimately reports to the management boards of both Houses.**

In September 2021, the Modern Slavery Programme was absorbed into the newly formed Social Sustainability Team. The Social Sustainability Team is responsible for developing Parliament's approach to social sustainability, with a focus on business ethics, diversity & inclusion, health & wellbeing and community engagement. This work has an emphasis on the approach to supply chain management in these areas. Modern slavery fits into this wider programme of work, under our business ethics workstream. The Social Sustainability Team works across Parliament on behalf of both Houses and PDS.

A Social Sustainability Working Group has been set up to oversee Parliament's social sustainability agenda, including the Modern Slavery Programme. The working group is a consultative forum, which includes colleagues from Procurement, Learning and Development, Environmental Sustainability and Diversity & Inclusion. The working group provides accountability for our modern slavery targets and supports the advancement of the programme.

## Management Board 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.

## Advisory Group on Modern Slavery and the Supply Chain

**Parliament's Advisory Group on Modern Slavery and the Supply Chain is important to the governance of Parliament's anti-slavery work. The group provides a forum for consultation and anti-slavery best practice and is comprised of Members of both Houses from across political parties, as well as a number of specialists on modern slavery and ethical business.**

Throughout the year we have created numerous opportunities to account for the latest research and evidence on forced labour. The Advisory Group on Modern Slavery and the Supply Chain regularly invited subject matter experts to speak on related topics, such as:

- The Living Wage as a protective mechanism against forced labour
- The [ETI Human Rights Due Diligence Framework](#)
- Best practice approaches to anti-slavery in large corporations

# Membership of Parliament's Advisory Group on Modern Slavery

In March 2022, Peter Bone MP was appointed as chair of the group, following the chairmanship of Lord Field of Birkenhead. Mr Bone has been the Conservative Member of Parliament for Wellingborough and Rushden since 2005. Formerly the co-chair of the APPG on Human Trafficking, tackling the issue of modern slavery has always been one of Mr Bone's priorities as a Member of Parliament.



**Peter Bone MP**  
(Chair)



**Karen Bradley MP**



**Baroness  
Butler-Sloss GBE**



**Patricia Carrier**  
Business and  
Human Rights Expert



**Darren Jones MP**



**Professor  
Genevieve LeBaron**  
Professor and Director of  
the School of Public Policy  
at Simon Fraser University



**Peter McAllister**  
Executive Director,  
Ethical Trading  
Initiative



**Dr Aidan McQuade**  
Independent Consultant  
in Ethical Leadership



**Maria Miller MP**



**Andrew Selous MP**



**Chris Stephens MP**



**Baroness Young  
of Hornsey**

## SECTION 2

# Policies in relation to Modern Slavery

This section is about the relevant UK Parliament policies in place to prevent exploitation in our operations and supply chains.

## UK Parliament Modern Slavery and Human Trafficking Policy

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

We are committed to annually reviewing the policy to ensure Parliament's approach continues to follow best practice. This year [Slave Free Alliance](#) conducted a policy review as part of a broader piece of work focused on escalation and remediation development.

The review identified areas for improvement within the policy's section on reporting mechanisms. This

included the need to specify that for incidents with a high level of threat, risk or harm, there should be a requirement to always refer to emergency authorities without delay. This is to ensure victims of modern slavery can be appropriately safeguarded. These identified improvements are currently being implemented and will be reported on in next year's Modern Slavery Statement.

### Raising awareness of the policy

One of our aims for the past year was to make all parliamentary staff aware of the Modern Slavery and Human Trafficking Policy. In this endeavour, we delivered a suite of mixed media communications to all staff.

We uploaded the policy to the [UK Parliament website](#), the staff intranet and more recently our Social Sustainability SharePoint hub, making it accessible to all staff. To ensure that staff knew where to find the policy, we shared it in a wide range of newsletters across Parliament, including via communications marking Anti-Slavery Day in October 2021. We also promoted the policy to suppliers via the In House Services and Estates supplier newsletter as part of our tactical supplier engagement approach.

Members of the Social Sustainability Team attended numerous departmental meetings and Workplace Equality Network<sup>5</sup> meetings to raise awareness of the Modern Slavery Programme and policy. We also promoted the policy as part of all our modern slavery training sessions, reaching 163 people.

Finally, we established advocates within the organisation to champion and promote the policy. This included members of the Modern Slavery Working Group (now part of our Social Sustainability Working Group), the Advisory Group on Modern Slavery and the Supply Chain, and our Management Board Advocates. To ensure we reach our goal of making all staff aware of the policy, we intend to continue with the communication approach detailed above throughout 2022/23.

5 The House of Commons and House of Lords have established Workplace Equality Networks (WENs) to provide an opportunity for groups of people to discuss and consider issues relevant to their situation or of interest to them. In particular, WENs can be useful forums for groups protected by equality legislation.

# Guidance for Procurement and Commercial Professionals

## PPN 05/19

PPN 05/19 is a Procurement Policy Note, published by the Cabinet Office in 2019. It sets out guidance on how to identify and mitigate modern slavery risks throughout the commercial life cycle.

This guidance supported the development of our Modern Slavery and Human Trafficking Policy as well as our approach to risk mitigation in the supply chain. We continue to use this guidance where relevant in the development of our Modern Slavery Programme.

## PPN 06/20

PPN 06/20 is a Procurement Policy Note, published by the Cabinet Office in September 2020. It considers the role of social value<sup>6</sup> in the award of contracts and creates a standardised approach to assessing and incorporating social value in public procurement.

The Social Value Model has five central themes:

1. COVID-19 recovery
2. Tackling economic inequality
3. Fighting climate change
4. Driving equal opportunity
5. Wellbeing

The model indicates that a minimum weighting of 10% should be placed on social value within the tender evaluation criteria of all procurements. Theme 4 of the model covers equal opportunity and tackling workforce inequality. It is within this theme that modern slavery is covered, with the criterion outlined as ‘demonstrate action to identify and manage the risks of modern slavery in the delivery of the contract, including in the supply chain’.

We are carrying out work to explore the implementation of this procurement model within Parliament. This work is ongoing and we aim to have implemented the model, or something similar, during the next year. This programme of work will be supported by Parliament’s Social Sustainability Working Group.

In order to ensure progress and to measure our success aligned with implementation of the model, we have plotted several intervention stages where we will assess ourselves against the Government Commercial Assessment Tool, under practice area 8.2. The final assessments will take place three months after implementation of PPN 06/20, to ensure the model is embedded in practices and processes.

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6 Social Value refers to the additional benefits to society created by an organisation throughout its work and day-to-day activities.

## Other relevant policies

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

<b>Sustainable Procurement Policy</b>	<p>The UK Parliament recognises its purchasing power and the impact our own purchasing practices can have on the conditions of workers in supply chains. We have a Sustainable Procurement Policy in place to foster a supply chain that supports its workers and acts in a way that is beneficial to their welfare. This policy is due to be updated.</p>
<b>Behaviour Code</b>	<p>The UK Parliament <a href="#">Behaviour Code</a> outlines clear guidelines on how people should be treated, and states that bullying, harassment and sexual misconduct will not be tolerated. The Behaviour Code applies to everyone who visits and works for Parliament.</p>
<b>Whistleblowing policies</b>	<p>At the UK Parliament, malpractice and impropriety is treated very seriously. As such, both Houses have policies for employees to disclose malpractice or impropriety for instances such as criminal activity, abuse of office or a miscarriage of justice.</p>
<b>Safeguarding Policy</b>	<p>There is a <a href="#">Safeguarding Policy</a> in place to ensure children, young people and vulnerable adults are provided with a safe environment when on the Parliamentary Estate or when engaging with our staff in the wider community.</p>
<b>Living Wage Employers</b>	<p>Both Houses of Parliament are accredited by Citizens UK as London Living Wage Employers. This applies to our direct employees, our contractors and their sub-contractors if they have personnel working directly on UK Parliament premises or are providing services to Parliament from another location in London.</p> <p>Additionally, where the House of Commons contracts on its own and for joint Lords and Commons contracts, suppliers and subcontractors which provide services from outside of London must pay their dedicated personnel at least the UK Living Wage.</p>  <p>The logo consists of three overlapping circles in blue, green, and yellow. The text 'We are a Living Wage Employer' is written across the circles in a white, sans-serif font.</p>

## SECTION 3

# Risk Assessment

This section details our understanding of the most severe and tractable modern slavery risks in our supply chain, and how we are working to mitigate them. We also highlight the construction industry and examine some of the factors that make it a high-risk sector for modern slavery.

## Supplier mapping and risk assessment

### Modern Slavery Assessment Tool (MSAT)

**In 2020/21, we carried out a risk assessment of our Tier 1 suppliers, taking into account value and size of contract, operating context and the nature and location of their work. This 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, recruitment and maintenance contracts). We invited all suppliers to complete the Modern Slavery Assessment Tool (MSAT), with 46% of them doing so by 31 March 2022.**

Since initiating this piece of work in late 2020, we have had limited resources to increase the completion rate of the MSAT. In this time, there have also been some changes to our supply base. As such, some of our contracts have ended or changed to suit our changing needs as an organisation. This justified a refresh of our approach to supplier engagement, including a review of the suppliers being targeted for completion of the MSAT.

Therefore, our focus in the last financial year has been to refresh the segmentation of Parliament's suppliers according to their modern slavery risk level. Once the pool of high-risk suppliers has been updated, we will invite them to complete the MSAT. Once completed, the MSAT will provide suppliers with tailored good practice recommendations on how to improve their anti-slavery activity, from how they conduct risk assessments to ensuring their due diligence helps prevent debt bondage.

We aim to analyse the recommendations of these new MSAT submissions to steer our risk mitigation approach. This may include:

- Gaining greater visibility of our Tier 2 supply chain by increasing our engagement with Tier 1 suppliers.
- Conducting vertical supply chain risk mapping.
- Working with particularly high-risk suppliers to conduct deep dive activity around their supply chain, below Tier 2.
- Engaging forced labour experts to conduct bespoke due diligence audits.
- Requiring suppliers identified as high-risk to complete the MSAT annually, as well as monitoring the implementation of their MSAT recommendations.

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

#### Key Performance Indicator

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

#### Key Performance Indicator

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

## Identified risks

The risk assessment carried out in 2020, in combination with recent research and events, has enabled us to identify our most salient and tractable modern slavery risks. We recognise that the highest-risk procurement areas for Parliament are PPE, construction, facilities management, recruitment and catering, especially where these functions are outsourced to third-party suppliers.

We understand that these sectors have a higher distribution of agency workers and migrant labour<sup>7</sup>. In cases where these factors are coupled with a workforce that has a lack of knowledge of local language or

fewer livelihood options, the abuse of vulnerability is more likely<sup>8</sup>. Below we provide a case study on the construction sector and examine the factors that can make this a high risk area.

### Risks in construction

The Gangmasters & Labour Abuse Authority (GLAA) stated that in 2020 exploitation in the UK construction industry was most frequently reported in London<sup>9</sup>. As the UK Parliament is based in Westminster, London, we have chosen to prioritise this sector for risk mitigation work.

Though forced labour and modern slavery represent the most severe forms of exploitation within the construction industry, Parliament recognises that exploitative practices can also include excessive working hours, poor health and safety standards and the withholding or underpayment of wages.

At present we have mitigated risk in this area by mandating that all our Tier 1 suppliers commit to paying the London Living Wage for workers, as well as ensuring their staff all have a Right to Work. This also applies to suppliers' subcontractors and any dedicated personnel working on the premises or providing services from another location in London. Contractual conditions such as these will go some way in establishing protective mechanisms against forced labour in our construction supply chain.

Modern slavery and forced labour exist at one extreme of a spectrum, the other end of which is decent work. In committing to the Living Wage, people will have increased access to non-exploitative and decent work. In the future, we will be exploring further work focused on Living Wage compliance in the supply chain. In addition, we plan to utilise the MSAT submissions to support our highest-risk construction suppliers in carrying out targeted anti-slavery work.

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7 The Migration Observatory. 'Migrants in the UK Labour Market: An Overview', Figure 8: Migrant workers across economic sectors 2020 (viewed June 2022).

8 Impactt. 'Tackling modern slavery in PPE supply chains: Tools and further guidance', 2021, page 4.

9 GLAA. Industry Profile – Construction - 2020 (viewed April 2022).

## SECTION 4

# Due Diligence Processes

This section describes the modern slavery due diligence steps we have undertaken during the last year. We also highlight the potential incident of forced labour uncovered in one of our supply chains last year and the steps we have taken since.

## Escalation and Remediation procedure

**One of the areas we identified to be improved upon in 2020/21 was our approach to modern slavery escalation and remediation. It is recognised that without a formal escalation process in place, concerns regarding modern slavery might not be responded to appropriately.**

In March 2022, Parliament initiated a partnership with [Slave Free Alliance](#), to help us develop an escalation and remediation procedure. Phase 1 of the work was initiated, starting with a policy review. The project will be comprised of several stages, including process implementation and tailored training sessions for first responders. By the end of 2022, we aim to have formalised the escalation and remediation procedure, such that we can efficiently and consistently escalate concerns or reports of modern slavery and ensure appropriate protection and remediation for potential victims.

## Supplier terms and conditions

**In 2020/21 we carried out work to strengthen our supplier terms and conditions, by developing a detailed and robust set of modern slavery clauses. To read about these clauses, please refer to our [Modern Slavery Statement 2020/21](#).**

This year we have made a concerted effort to include the updated terms and conditions into all new general supplier contracts. We are also considering including these terms and conditions, where possible, in existing contracts, especially those coming up for renewal.



SLAVE-FREE  
ALLIANCE

Working Towards a  
Slave-free Supply Chain

## Lessons Learnt

**Something we will include in Parliament's Modern Slavery Statements moving forward is a reflection on the lessons we have learnt in the previous year. This is because we understand that information sharing and transparency are vital in the fight against modern slavery. Recent events and research have led us to identify a new high-risk area in Parliament's supply chain – Personal Protective Equipment (PPE).**

In 2020, the COVID-19 pandemic caused a huge increase in demand for the manufacture of PPE, including the increased need for disposable gloves. In 2021, evidence was found linking several Malaysian glove manufacturers to forced and bonded labour within factories<sup>10</sup>.

Malaysia's manufacturing workforce is made up of many migrant workers, some of whom are required to pay high recruitment fees to work in the country<sup>11</sup>. Weak protective mechanisms in Malaysia, paired with a lack of appropriate legal enforcement, have created an environment more prone to

exploitation, especially in high-risk industries such as manufacturing. The evidence suggested that a significant number of those exploited in glove factories were migrant workers, many of whom had paid exorbitant recruitment fees to secure their position. This left them vulnerable to abuses such as debt bondage, threats and coercion from employers and sub-contractors.

Last year we were alerted to a potential incident of forced labour in our PPE supply chain. Below we report on our response to the incident.

### Procurement of gloves

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

Though we were initially assured that the gloves on our estate came from an alternative destination to the site identified, we took the incident extremely seriously. At Parliament, if we become aware of any allegations against our suppliers, at Tier 1 and beyond, we will always take appropriate action.

We believe in an approach of working proactively and collaboratively with suppliers to remediate forced labour, and supporting them in eliminating it.

We have requested that further orders from Supermax are paused whilst remediation takes place. There have been two independent audits commissioned by Supermax. We have analysed the results of both audits so far and are pleased to see that progress is being made. These include, but are not limited to:

- The roll out of a Foreign Worker Management Policy to strengthen its Human Resources management and migrant workers policies and practices.
- Committing to remediation payments for all current and former workers, as well as tracking and locating workers who have returned to their home country.
- Setting up an ex-gratia payment to all its workers and adding a further element of interest on the amount of past recruitment related fees and costs paid by workers.

We will continue to work with the Tier 1 supplier during this remediation and improvement process and keep a close eye on the situation.

The incident itself caused us to reflect on our approach. We have since reconsidered PPE to be a high-risk procurement area, which will allow us to carry out targeted risk mitigation work. In addition, the work we are carrying out to develop a formal escalation and remediation procedure will increase our ability to deal with potential future incidents in the supply chain.

<sup>10</sup> Modern Slavery and Human Rights Policy and Evidence Centre. 'Forced Labour in the Malaysian Medical Gloves Supply Chain before and during the COVID-19 Pandemic: Evidence, Scale and Solutions' 2021, page 29.

<sup>11</sup> In 2019, migrant and irregular migrant workers were estimated to make up between 20-27% of Malaysia's labour force. See, 'Forced Labour in the Malaysian Medical Gloves Supply Chain before and during the COVID-19 Pandemic: Evidence, Scale and Solutions' 2021, page 22.

## SECTION 5

# Training and Awareness

This section describes the progress we have made with modern slavery training and awareness raising. During the last year we launched two training programmes – one targeting contract managers with a commercial focus and one for all-staff, aimed at raising awareness of modern slavery. We also increased our awareness raising communications internally and refined our supplier engagement approach.

## Training

As of 31 March 2022, we had trained a total of 163 staff members in how to spot the signs of modern slavery and where to report suspicions. After every training session we asked for participant feedback to aid with measuring the impact of the training, so that we can make regular improvements where required.

### Commercial staff training

**In October 2021, we rolled out a modern slavery training programme called the ‘Introduction to Modern Slavery for Contract Managers’. This training programme has a unique commercial focus and explores a case study of forced labour in the supply chain. It emphasises the role of contract managers in carrying out appropriate due diligence and preventing exploitation within Parliament’s supply chain. The training consists of a 1.5-hour virtual workshop with interactive elements, with the following learning outcomes:**

- To understand what modern slavery is, the national and global scale and the types of modern slavery.
- To understand the work of Parliament’s Modern Slavery Programme.
- To be aware of the role of contract managers in mitigating modern slavery risks in the supply chain.

Parliament has 267 contract managers. As of 31 March 2022, we had trained 88 contract managers through six of these training sessions. Of those who have attended the sessions and completed the feedback survey, 100% agreed that the training was a useful and worthwhile investment of their time.

We plan to continue running these training sessions throughout 2022/23, with the ambition of reaching as many contract managers as possible. This goal is so important to us that we have developed a KPI to track our performance against it:

#### Key Performance Indicator

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

## All-staff sessions

**The second of the training programmes developed last year was the all-staff ‘Introduction to Modern Slavery Bitesize Session’. We ran two sessions around Anti-Slavery Day in October 2021 and subsequently rolled out a series based on their success. The purpose of this additional training programme is to ensure that parliamentary staff can increase their understanding of modern slavery, even if they do not sit in a commercial role.**

The training consists of a 45-minute virtual workshop session with interactive elements, with the following learning outcomes:

- To explore what modern slavery is, the national and global scale and the types of modern slavery.
- To have an overview of the work of Parliament’s Modern Slavery Programme.
- To understand how to spot the signs of modern slavery, and how to seek support and advice.

As of 31 March 2022, we had trained 75 staff members through these sessions. We have further monthly training sessions planned until September 2022. Later this year we will review the success of this training and consider making changes to the format where appropriate.

We plan to continue running this training throughout 2022/23, as this is a highly important part of Parliament’s anti-slavery work. We have therefore developed a KPI to track our performance in this area:

### Key Performance Indicator

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

## Future plans

**As well as continuing to deliver both training offerings detailed above, Parliament’s Modern Slavery Programme has the following goals in the pipeline for 2022/23 to create more opportunities for learning:**

### Gap analysis

At the end of March 2022, we conducted a gap analysis on both training programmes. One of our ambitions for 2022/23 is to implement any recommended changes and update the training where appropriate. This is part of our continuous improvement approach to ensure we are providing the best possible training to our colleagues.

### Escalation and remediation training

As part of the escalation and remediation project, Slave Free Alliance will develop and deliver specialist training to the relevant group of stakeholders on how to respond to modern slavery incidents in the supply chain and on the Parliamentary Estate.

## Awareness raising

Raising awareness of our Modern Slavery Programme is an important part of our work. As part of our public-facing communications, we added information about Parliament's Modern Slavery Programme on the [UK Parliament website](#). In addition, we launched a press release to mark the publishing of our first Modern Slavery Statement.

Internally, we worked with the Communications Teams in both Houses to develop a staff focused communications campaign, reaching hundreds of colleagues. Below we detail aspects of this internal campaign<sup>12</sup>.

### Anti-Slavery Day 2021

The UK Parliament commemorated Anti-Slavery Day 2021 by raising awareness about the issues of modern slavery and human trafficking. This included the launch of a podcast episode, as well as including information in a variety of newsletters. During the week of Anti-Slavery Day, we also conducted two all-staff training sessions on how to spot the signs of modern slavery.

### Podcast

To expand our reach to new audiences, especially in the parliamentary estate-based community (non-desk-based colleagues), we developed a podcast episode as part of the In House Services and Estates Podcast Series. The 20-minute episode included special guests, Baroness Young of Hornsey and Andrew Selous MP, and raised awareness on the presence of modern slavery within the UK. Due to the success of the podcast, which has been listened to over 80 times, we aim to develop more episodes in the future.

## Supplier engagement

**Important to Parliament's awareness raising work is its engagement with suppliers on the issue of modern slavery. As outlined in section 3, we have spent the last financial year refreshing our approach to supplier engagement, including updating the segmentation of our suppliers according to their risk level. Once the pool of high-risk suppliers has been updated, we will invite them to complete the Modern Slavery Assessment Tool (MSAT).**

We will then carry out further data analysis of the submissions to identify any strengths and areas for improvement, which we will use to inform how we engage with our high-risk suppliers moving forward.

We carried out some supplier engagement at the annual Supplier Summit in September 2021, where we provided suppliers with an update on the work of Parliament's Modern Slavery Programme. Suppliers were also issued a feedback questionnaire after the event, which we used as an opportunity to engage with them about our work on modern slavery, including whether they would like to be included in our future supplier engagement and if they would like any guidance to develop their own approach to modern slavery mitigation. Of the suppliers who responded, 67% were interested in being involved and we plan to follow up on this as part of our supplier engagement approach this year.

We also issued an email bulletin to suppliers carrying out work for the In House Services and Estates (IHSE) team, with detail about Parliament's anti-slavery work. Further work will be carried out to include information more regularly within an external supply chain newsletter which is currently being developed. We will monitor our progress in supplier engagement by using the following KPI, with the aim of reaching more suppliers year on year:

#### Key Performance Indicator

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

<sup>12</sup> Refer to section 2 for detail on how we raised awareness of Modern Slavery and Human Trafficking Policy.

## SECTION 6

# KPIs and Effectiveness

This section details the development of our Key Performance Indicator framework to track our progress on anti-slavery work. It also outlines our next steps for 2022/23 and how we plan to build on the progress made in the last year.

## KPIs

### Development of KPIs

A KPI framework was developed in March 2022. The KPIs were developed using last year's goals and considered against Parliament's longer-term ambitions for our anti-slavery work. It has been acknowledged that the framework may need to be reviewed, supplemented and improved as the Modern Slavery Programme matures.

The KPIs below have been designed to track our progress across the next two years. We are still at the early stages of this programme of work, which is why we have received lower scores across some KPIs. Our aim is that by the next reporting period we will have significantly advanced in a number of these areas. As well as this, we plan to have developed additional KPIs focused on due-diligence and raising awareness.

### KPI framework

Key Performance Indicator	Progress
1. Percentage of contracts of high-risk & high value where the supplier has completed the Modern Slavery Assessment Tool (MSAT)	
2. Percentage of contract managers who received bespoke commercial training on modern slavery	
3. Number of all-staff participants to receive awareness raising training on modern slavery	
4. Total number of suppliers/contractors communicated with regarding modern slavery activity	
<b>Progress Key:</b>	 <b>Developing</b>  <b>Progressing</b>  <b>On Target</b>

# Goals

## Next steps for 2022/23

In 2022/23, our strategic focus will be on advancing the work of Parliament's Modern Slavery Programme across the organisation. This will involve building on the progress made last year and initiating new workstreams where appropriate.

**We will continue to build capability across the organisation so that staff and contractors understand what steps they should be taking to prevent modern slavery in our supply chains. To achieve this, in 2022/23 we will:**

- Continue to deliver a suite of awareness raising communications to all staff, including development of a SharePoint hub so that all staff can access any relevant modern slavery content. This will include a targeted effort to reach the estate-based community (non-desk-based colleagues) via on-site communications.
- Review and develop our current formal training offering for commercial staff and contract managers.
- Review and develop our formal training offering for staff to increase estate-wide understanding of modern slavery and how to spot the signs.
- Progress steps to implement and deliver bespoke training for those involved in responding to any incidents of modern slavery, alongside the development of our escalation & remediation procedure.
- Develop our approach to supplier engagement and communication to ensure our high-risk suppliers understand their role in mitigating the risk of modern slavery in the supply chain.
- Develop an internal advocacy approach for those appointed as Anti-Slavery Advocates on the House of Commons Executive Board and the House of Lords Management Board.

**We will build on our risk identification and due diligence measures. To achieve this, in 2022/23 we will:**

- As part of our commitment to continuous development, utilise the latest research and evidence about the root causes of forced labour in supply chains, through our subject-matter experts.
- Refresh and update segmentation of the suppliers invited to complete the MSAT to ensure our highest-risk suppliers are included in the risk mapping exercise.
- Analyse the results of the refreshed MSAT submissions to inform our risk mapping and supplier engagement approach.
- Further implement our supplier engagement approach, which will include engaging with high-risk Tier 1 suppliers to gain visibility of their suppliers at Tier 2. In some areas this may include vertical mapping or deep dive activity.
- Continue to implement the Social Value Procurement Model, which includes tender evaluation criteria on modern slavery.
- Develop and implement a modern slavery escalation and remediation procedure and approach.
- 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.

# Sign off

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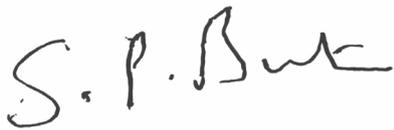
This statement has been approved by the House of Commons Executive Board and the House of Lords Management Board. This statement was approved in July 2022, for the financial year ending 31 March 2022.

Signed:   
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Date: 21 July 2022  
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**Signed by Dr John Benger,**  
the Clerk of the House of Commons,  
for the House of Commons Service

Signed:   
\_\_\_\_\_

Date: 21 July 2022  
\_\_\_\_\_



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