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| <b>Meeting</b><br><b>Police Committee</b><br><br>Procurement Sub-Committee<br>Port Health and Environmental Services Committee<br>Establishment Committee<br>Community and Children’s Services Committee<br>Policy & Resources Committee | <b>Date</b><br><b>5 December 2018</b><br><br>16 January 2019<br>27 November 2018<br>29 October 2018<br>2 November 2018<br>15 November 2018 |
| <b>Subject</b><br>City Corporation Modern Slavery Statement  | <b>Public</b>  |
| <b>Report of</b><br>The Chamberlain  |  |
| <b>Report Author</b><br>Natalie Evans, Responsible Procurement Manager,<br>City Procurement  | <b>For Information</b>   |

### **Summary**

1. This Report accompanies the proposed City of London Corporation ‘Modern Slavery Statement’ developed in response to the Modern Slavery Act 2015. It is proposed that the City Corporation complies with the annual reporting requirements associated with the Modern Slavery Act, on a voluntary basis, in the interest of due diligence and transparency, and to appropriately reflect the organisation’s strong commitment to responsible business principles.
2. The City of London Police has a responsibility to help identify and eliminate modern slavery through its law enforcement remit and the City Corporation through its business activities, ensuring effective due diligence procedures are in place to safeguard against modern slavery taking place within our organisation, our jurisdiction and our supply chain.
3. The Corporation also plays a philanthropic role by funding activities designed to support refugees and asylum seekers who have experienced human trafficking, disrupt global human trafficking and combat its practice in the UK.
4. This Modern Slavery Statement brings together the roles, remits, commitments and all work undertaken by the City of London Police, Department for Children and Community Services, Community Safety, Port Health & Public Protection, HR, City Procurement, the Barbican, City Bridge Trust and Heart of the City, also detailing future plans for continuous improvement.

### **Recommendations**

That Police Committee:

- Approves the publication of a voluntary Modern Slavery Statement by the City Corporation

- Approves the version submitted, including the 'Modern Slavery Policy'.
- Notes and specifically approves the 'continuous improvement' sections detailed throughout, which will form the basis of the action plan used to drive progress amongst all relevant departments over the next year.

## **Main Report**

### **Background**

5. The Modern Slavery Act 2015 was enacted in response to prioritisation of this issue by the UK Government. It requires commercial entities that operate in the UK, with a turnover of more than £36m, to produce an annual Modern Slavery Statement detailing current and planned actions to tackle this crime.
6. The City Corporation is not a relevant commercial organisation as defined by section 54 of the Act. However, it is recommended that the City Corporation comply with its annual reporting requirements on a voluntary basis in the interest of due diligence and transparency, and to appropriately reflect the organisation's strong commitment to responsible business principles. It should also be taken into account that many other public authorities, including numerous London boroughs have already published their own Statement.
7. Representatives from the City of London Police, the Barbican, City Procurement, Children and Community Services, Community Safety and Corporate Strategy and Performance came together in early 2018 to establish the City Corporation's inter-departmental Working Group on Modern Slavery.
8. The first priority of the Working Group was to bring together all current action taking place to tackle modern slavery, to harmonise approaches and ensure that resources and lessons learned are shared across the Corporation. The proposed Modern Slavery Statement was developed based on this work.
9. Earlier this year, the City Corporation made a pledge, signed by the Chairman of Policy & Resources Committee, to tackle modern slavery as part of the Evening Standard's anti-slavery campaign. This Statement would represent a transparent way of demonstrating the organisation's commitment to this pledge.
10. The Modern Slavery (Transparency in Supply Chains) Bill 2017-2019 is currently progressing through the House of Lords. Amongst other amendments, this Bill proposes to extend the scope of the existing Act to public sector authorities. The voluntary publication of this Modern Slavery Statement could therefore also be viewed as a way of future proofing the City Corporation's approach.

## Methodology

11. The Statement is divided into five sections, structured to reflect our actions according to the City Corporation's responsibilities and the level of control or influence the organisation is able to exert:

- **Our Organisation** – Overarching commitments and organisational approach
- **Our People** – The Corporation's employees.
- **Our Jurisdiction** – People living, working in and visiting the Square Mile.
- **Our Wider Community** – Charitable organisations and business community.
- **Our Supply Chains** – Domestic and global supply chains.

12. Each section is separated into four parts, according to the requirements of a Modern Slavery Statement under s.54 of the Modern Slavery Act.

- **Remits and relevant risks** – Within the remit of each department; identifying the people, places, trades and industries at the highest risk.
- **Policies and commitments** – Overarching and department-specific policies and commitments to tackling modern slavery and other labour rights abuses.
- **Existing interventions** – Actions already being undertaken to identify and deal with modern slavery and to minimise the risk of it occurring.
- **Continuous improvement** – Assessing the effectiveness of our current interventions, creating plans to bridge identified gaps, developing appropriate performance indicators, monitoring and reporting on progress.

All actions described within the 'continuous improvement' sections will be combined to form an action plan, which will be overseen by the Responsible Business Implementation Group, coordinated by the Inter-departmental Working Group on Modern Slavery and undertaken by relevant City Corporation Officers.

## Corporate and Strategic Implications

13. The following aims and outcomes within the Corporate Plan underpin the City Corporation's commitment to combatting human and labour rights abuses:

### ***Contribute to a flourishing society:***

- People are safe and feel safe
- People enjoy good health and wellbeing
- People have equal opportunities to enrich their lives and reach their full potential

### ***Support a thriving economy:***

- Businesses are trusted and socially and environmentally responsible

14. The Responsible Business Strategy 2018-23: sets out the City Corporation's stance on advocating for human rights in its decision-making processes so that

people are treated appropriately and with dignity. It also details its commitment to actively preventing fraud, corruption and bribery in its own operations and influencing supply chains and partners to do the same.

15. The Responsible Procurement Strategy 2015-18 aims to deliver best value in a way that improves the lives of those in its supply chain and helps the City Corporation make procurement decisions that act as a catalyst for positive change. It details the City Corporation's commitment to tackling human and labour rights violations, including modern slavery.

## **Conclusion**

16. The publication of a Modern Slavery Statement would constitute a clear and transparent demonstration of the City Corporation's commitment to tackling modern slavery, both internally and externally. It brings current and future actions into one place allowing all departments and other relevant entities an oversight and a point of reference to ensure effective collaboration.

17. The length of the Statement reflects the requirements set under s.54 of the Act and moreover the comprehensive amount of work already being undertaken.

## **Appendices**

Appendix 1 - City of London Corporation Modern Slavery Statement

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