



City of London Corporation Modern Slavery Statement

1. This Modern Slavery Statement, covering November 2018 – June 2019, is made in response to s.54 of the Modern Slavery Act 2015 (“the Act”). It sets out the steps that the City of London Corporation (“City Corporation”) has taken and is continuing to take to ensure that modern slavery is not taking place within our business, within the Square Mile or within our supply chains.
2. For the purposes of this Statement and associated Policy, the term ‘Modern Slavery’ encompasses slavery, servitude, human trafficking, forced or compulsory labour and child labour.
3. The City Corporation is not a relevant commercial organisation as defined by section 54 of the Act. However, it will comply with its annual reporting requirements on a voluntary basis in the interest of due diligence and transparency, and to appropriately reflect the City Corporation’s strong commitment to responsible business principles.
4. This Modern Slavery Statement is divided into five sections:
 - i. **Our Organisation** – The City Corporation’s approach to tackling modern slavery. This overarching commitment is supported at the highest level and inter-departmental collaboration is used to ensure a harmonised and effective approach.
 - ii. **Our People** – Helping to protect our own employees, based at any City Corporation location, from becoming victims of modern slavery through fair recruitment practise, pay and conditions, and having support mechanisms in place such as access to whistleblowing and an employee assistance programme.
 - iii. **Our Jurisdiction** - Creating conditions that minimise the risk of modern slavery occurring within the Square Mile, identifying modern slavery that does occur within our geographical jurisdiction, referring any victims on to the help and support they need and ensuring any perpetrators of this crime are brought to justice.
 - iv. **Our Wider Community** – Using our influence to facilitate positive action on modern slavery amongst charitable organisations and our wider business community.

- v. **Our Supply Chains** – Using responsible procurement and contract management due diligence procedures to minimise risks of modern slavery taking place within our domestic and global supply chains.
5. Within each of these five sections, the following aspects are described, as per the requirements of a modern slavery statement under s.54 of the Act:
- a. **Remits and relevant risks** – Within the remit of each department; identifying the people, places, trades and industries at highest risk of being associated with modern slavery
 - b. **Policies and commitments** – Overarching and department-specific policies and commitments to tackling modern slavery and associated human and labour rights abuses
 - c. **Existing interventions** – Actions already being undertaken to identify and deal with modern slavery and to minimise the risk of it occurring. This includes training & awareness programmes and due diligence procedures such as referrals, site visits & spot checks, contractual provisions and contract monitoring & management.
 - d. **Continuous improvement** – Assessing the effectiveness of our current interventions, creating plans to bridge identified gaps, developing appropriate performance indicators, monitoring and reporting on progress.

i. Our organisation

a. Remit and relevant risks

6. The Square Mile is the historic centre of London and is home to the ‘City’ – financial and commercial heart of the UK. The City Corporation provides local government services for the Square Mile and supports and promotes the City as the world leader in international finance and business services. The organisation’s responsibilities extend far beyond the City boundaries in that it also provides a host of additional facilities for the benefit of the nation, including air and sea ports, the Barbican and various open spaces.
7. City Bridge Trust is the funding arm of Bridge House Estates, of which the City Corporation is the sole trustee. It was established to make use of funds surplus to bridge requirements and provides grants totalling around £20m per year towards

charitable activity benefitting Greater London. Heart of the City is a business-led charity, limited by guarantee and housed the City Corporation, which is its main funder and Treasurer.

8. The City of London Police is the territorial police force responsible for law enforcement within the City of London, with other specific remits nationally. The City of London Police is divided into four directorates: Crime Investigation, covering serious & organised crime, terrorism, acquisitive criminality and violent crime; Economic Crime, which looks at fraud; Intelligence and Information, responsible for coordination of intelligence and information management; and Uniform Policing, providing policing response and specialist skills and support both internally and to other police forces.
9. From an organisational perspective, it is recognised that modern slavery is a crime that is prevalent both within and outside of the UK, across many industries and as such it is a risk that the City Corporation takes seriously. However, rather than this risk being looked at in isolation, modern slavery is managed alongside a range of other risks that must be dealt with as part of our business activities e.g. implementing responsible procurement, tackling serious and organised crime, safeguarding of children and vulnerable adults, health and safety in construction etc.

b. Policies and commitments:

10. The recently published Corporate Plan (2018-2023) sets out the priorities of the City Corporation as the governing body of the Square Mile, dedicated to a vibrant and thriving City, supporting a diverse and sustainable London within a globally successful UK. The following aims and outcomes within the Plan underpin the City Corporation's commitment to combatting human and labour rights abuses such as modern slavery:

10.1 *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

10.2 *Support a thriving economy:*

- Businesses are trusted and socially and environmentally responsible

11. The Responsible Business Strategy 2018-23: 'Towards a Sustainable Future' describes in more detail how the City Corporation intends to achieve the above aims and outcomes. This Strategy sets out the organisation's objective of creating positive

impact and reducing negative impact across all its activities and decisions. More specifically, the Strategy states the City Corporation's stance on advocating for human rights in its decision-making processes so that people are treated appropriately and with dignity. The Strategy 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.

12. The following is the City Corporation's stand-alone Policy on modern slavery:

Overarching City of London Corporation Modern Slavery Policy

The City Corporation recognises its responsibility to help identify and eliminate modern slavery through its business activities. The organisation will ensure that effective due diligence procedures are in place to safeguard against any form of modern slavery taking place within our business, our jurisdiction or our supply chain. These procedures will be reviewed and continuously improved upon over time.

c. Existing interventions

13. Representatives from the City of London Police, the Barbican, City Procurement, Department for Community and Children's Services, Community Safety and Corporate Strategy and Performance Team came together in early 2018 to establish the City Corporation's inter-departmental Working Group on modern slavery.

14. The first priority of the Working Group was to bring together all current action taking place to tackle modern slavery by the City Corporation, to harmonise our approach and ensure that resources and lessons learned are shared across the City Corporation. This current Modern Slavery Statement was developed based on this work.

d. Continuous improvement

15. The Working Group plans to invite representatives from other relevant departments to contribute their ideas going forward, including HR and Licensing. A network of 'Safeguarding Champions' is to be re-launched in the coming months, acting as departmental points of contact and channels for dissemination of key messages to and from the Working Group.

- 16. The next priority of the Working Group going forward is to identify any gaps or weaknesses and plan future interventions and areas for potential collaboration that could be used to continuously improve our approach. The principal areas identified so far are an increased number of internal and external training and awareness raising initiatives.
- 17. Specific continuous improvement plans are discussed more fully as part of the following sections covering Our People, Our Community and Our Supply Chain.

ii. Our People

a. Remit and relevant risks

- 18. This section covers the City Corporation’s work helping to protect our own employees from becoming victims of modern slavery. These City Corporation-wide efforts are led by our Human Resources Department.

b. Policies and commitments

- 19. Alongside the City Corporation’s Modern Slavery Policy outlined in Section 1.b, the City Corporation has a series of policies, codes of conduct and adopted principles that set out how the organisation makes sure that people are working legally, that everyone is treated fairly and with dignity, and that people conduct themselves appropriately.
- 20. **Recruitment Policy:** The City Corporation operates a robust recruitment policy, including conducting ‘right to work in the UK’ checks for all employees. All offers of employment are conditional on these checks being completed to the organisation’s satisfaction. Where an individual is working in the UK on a visa or work permit of a fixed term, the City Corporation requires the individual to provide proof of their continuing right to live and work in the UK before continuing their employment.
- 21. These processes are managed and overseen by our HR department and guidance is provided to all recruiting managers to ensure these checks are carried out effectively. They represent an initial measure of safeguarding against the City Corporation employing any individual that has been illegally trafficked and/ or is being forced to work against their will.
- 22. **Whistleblowing Policy:** [The City Corporation’s Whistleblowing Policy](#) applies to all staff. It details the channels through which employees should raise serious concerns,

providing assurance that there should be no fear of reprisals. Concerns regarding potential instances of modern slavery can be raised in this way alongside other forms of abuse and coercion staff may be experiencing or suspicious of. Staff are made aware of this Policy through various channels including during induction training and the staff intranet.

23. **Codes of Conduct:** Our continued success relies on the trust and confidence of the public and therefore all staff and elected representatives are expected to uphold the highest standards of personal conduct and integrity including a requirement for all staff to uphold the [Nolan Principles on standards in public life](#).
24. There are 100 Common Councilmen and 25 Aldermen serving as elected representatives, collectively referred to as 'Members'. Members represent public interest and inform how the City Corporation should carry out its various activities. Members adhere to the City Corporation's [Code of Conduct for Members](#).
25. Similarly, City Corporation employees must adhere to the [City of London's Employee Code of Conduct](#). This incorporates requirements to abide by City of London anti-corruption measures and that all employees are treated with fairness and equality.
26. The Code also sets out the expectation that employees, and other stakeholders including suppliers, who have serious concerns about the conduct of any aspect of the City Corporation's work to come forward and voice those concerns. It commits the organisation to treating any suspicion of wrongdoing seriously, with concerns reviewed and analysed in accordance with the Whistleblowing or Complaints Policy, considering the Public Interest Disclosure Act, the Human Rights Act and if appropriate the City Corporation's Anti-Fraud and Corruption Strategy.

c. Existing interventions

27. **Policy implementation:** The City Corporation strives to be an excellent employer with a modern suite of employment policies and procedures. Corporate HR ensures the effective management of policies, this includes routine reviews to be in compliance with legal and mandatory requirements, alignment to best practice, monitoring and enforcement oversight.
28. It is the responsibility of all managers across the organisation to put written policies and procedures into practice. Under the 'Managing People Policy', managers are primarily responsible for ensuring their consistent application so that all employees

are managed in a fair and consistent manner. It is also important for Managers to support employees in understanding and interpreting policies correctly.

29. Corporate HR ensures the ready accessibility of its HR policies and procedures through the Employee Handbook, HR Topics pages, Managers' Guide and a New Starters' Resource page; all of which are located on the intranet. In addition, the provision of a suite of training workshops/briefings, e-learning, team meetings and staff/manager news items are just some of the means of cascading either changes or new policies and procedures.
30. The City Corporation has an Employee Assistance Programme, which operates 24/7 for 365 days of the year, to provide staff and their partner or a family member confidential support on a wide range of work and personal issues which may include cases of modern slavery.
31. **Training:** The City Corporation has made an e-learning course available to all staff and Members. This hour-long online modern slavery training aims to raise awareness of the issue and help staff recognise their role in identifying and reporting concerns.
32. **Living Wage:** The City Corporation is proud to be an accredited Living Wage employer. This commits us to paying at least the Living Wage to all staff, contractors and sub-contractors according to the parameters set by the Living Wage Foundation. The City Corporation also goes one step further by paying the Living Wage to all apprentices and interns.

d. Continuous improvement

33. The City Corporation has on-going commitment to train all managers as part of the organisation's Health and Wellbeing Strategy. The strategy has also included the roll out of Mental Health First Aiders within the departments. These roles are well placed as the potential first point of contact for employees who are experiencing any mental health issues or emotional distress, to identify potential signs of Modern Day Slavery.
34. The City Corporation is currently reviewing methods of monitoring payment of the Living Wage, along with the scope of the policy application. Any changes will be reported on as part of the next City Corporation modern slavery statement published in July 2019.
35. Coinciding with the publication of this Modern Slavery Statement, Chief Officers will encourage all staff to take a high-level version of the online modern slavery training.

The number of staff that have undertaken this training will be used as a performance indicator of information dissemination going forward.

iii. Our Jurisdiction

a. Remit and relevant risks

36. This section covers the protection of the community of the Square Mile from modern slavery. It is the City Corporation's responsibility to create conditions that minimise the risk of modern slavery occurring, monitor the highest risk trades and industries to identify any instances of modern slavery that do occur within our geographical jurisdiction. Any cases on modern slavery identified in the City would need to be referred to the City of London Police and the City of London's Single Point of Contact (SPOC), the Safeguarding and Quality Assurance Service Manager. Support would be offered to victims of modern day slavery through the Adult Social Care Team or Children's Social Care team. These services would then make a referral through to the National Referral Mechanism to support the victims of modern slavery and ensure any perpetrators of this crime are brought to justice. These interventions involve the Safer City Partnership (SCP), Community Safety team, Markets and Consumer Protection Department's Licensing team, the Department for Community and Children's Services Safeguarding and Quality Assurance team and the City of London Police.
37. The SCP brings together statutory and non-statutory representatives who aim to contribute towards keeping the City safe. Statutory partners include the City Corporation, City of London Police, London Fire Brigade, London Probation trust and the NHS Clinical Commissioning Group.
38. There is no typical victim of slavery. Victims are men, women and children of all ages, ethnicities and nationalities and cut across the population. However, it's normally more prevalent among the most vulnerable or within minority or socially excluded groups. Potential victims of human trafficking were reported from 116 different nationalities in 2017 according to the National Crime Agency's National Referral Mechanism statistics. Albanian, UK and Vietnamese nationals were the most commonly reported potential victims. 5,145 potential victims were submitted to the National Referral Mechanism in 2017, which was a 35% increase on 2016. In 2017, the National Referral Mechanism received 4714 referrals in England of which 2,464 potential victims of modern slavery cases were men, while 2247 were women, 2753 were adults and 1961 were children. The biggest increase in type of exploitation for adults is sexual

exploitation and children is labour exploitation. Other vulnerable groups include, but are not limited to, people who are/ have been involved in illegal activities, those who do not have a right to remain in the UK, children who are fleeing their home countries and seek out refuge in the Square Mile.

39. People at the highest risk of being victims of modern slavery in the Square Mile include sex workers, street traders, people employed in the hospitality industry i.e. hotels and restaurants, cleaners, construction workers and those providing domestic and care services or personal health and beauty services.

40. The City of London Corporation has responsibilities for over 40 sites outside the Square Mile including air and sea ports, open spaces, schools, housing estates, markets and cultural attractions. In terms of the sections of this modern slavery statement that cover our responsibilities in these areas:

40.1 In terms of people within our workforce, the interventions described in 'Section ii: Our People' applies, no matter the location of the site

40.2 In terms of suppliers or contractors, the interventions described in 'Section v: Our Supply Chains' applies, no matter the location of the site or department

41. In terms of any other person, who is not an employee or supplier to the City Corporation, being identified to be at risk of, or of currently being a victim of modern slavery on one of our sites outside the Square Mile, or being identified by someone affiliated with one of these satellite sites, the relevant police force, and Border Force in the case of ports, should be informed as they would have jurisdiction in this geographical area and would deal with the matter as part of their own policing strategy and through the National Referral Mechanism.

b. Policies and commitments:

42. The Department for Community and Children's Service's has identified a representative who will be acting as the single point of contact (SPOC) for modern day slavery for the City Corporation. This role is currently being held by the Safeguarding and Quality Assurance Service Manager, who supports referrals through to the National Referral Mechanism.

43. The Community Safety Team's commitment is to help keep all those who live, work or visit the Square Mile safe. The Team works closely with our communities to

understand their concerns and priorities and provide advice to help prevent people becoming a victim of crime and to promote awareness of how to report problems.

44. The City of London Police's Action Plan on Modern Slavery and Human Trafficking uses a four-pronged approach based on protection, preparation, prevention and pursuit. The actions are described in part c) below.

c. Existing interventions

45. **City of London Police:** Specific roles and responsibilities are delegated within the Force around training and intelligence and to deal with the victim(s), the suspect or organised crime groups and the subsequent investigation. The City of London Police's response to modern slavery is coordinated through the Force Lead, the Chief Inspector of Uniformed Policing – Custody and Response. The current Action Plan on Modern Slavery and Human Trafficking uses a '4 P's' approach:

45.1 **Protect:** This action includes close working with public bodies and private industry to identify vulnerabilities and improve the Force's target hardening capability in response. Intelligence and information sharing is essential to this work, enabling all parties to identify the threat and protect the economy and our communities:

- Promote awareness of the signs of modern slavery;
- Develop victim centric processes; and
- Collaborate with stakeholders and partners to identify early intervention opportunities.

The City of London Police form an essential part of the City Corporation's Working Group on Modern Slavery.

45.2 **Prepare:** This work includes developing positive relationships with law enforcement agencies and wider community, including the public, private and third sectors. The aim is to engage strategically and tactically to build specialist knowledge, enhance the Force's capability and effectiveness and to cut crime and protect the public:

- Intelligence picture to be regularly updated;
- Roll out training to frontline officers to educate and promote awareness in recognising victims at the earliest opportunity;
- Establish best practice regarding investigation of modern slavery offences; and
- Educate and inform City of London Police staff and partners/stakeholders.

As an example of recent work carried out as part of this action, train-the-trainer training was rolled out in Summer 2018 to City of London Police officers in order to facilitate knowledge as widely as possible on recognising the signs of modern slavery whether as part of the role of front office staff, a PC on patrol or a Detective executing a search warrant.

45.3 Prevent: This action encompasses the design and management of campaigns with partners to highlight the impact of the organised crime gang. These initiatives should deter individuals from committing organised crime and encourage people to report it. Creating a hostile operating environment for organised crime groups is essential.

- Conduct visits to perceived vulnerable premises;
- Promote convictions in media;
- Conduct prison visits;
- Promote use of orders for Slavery and Trafficking Prevention Orders.

The City of London (CoL) Police take an active role in identifying victims of modern slavery and human trafficking within the Square Mile and within high risk industries, for example by speaking to sex workers in brothels in collaboration working with partner charities and also by visiting construction sites and providing inputs within the community to other areas considered to be more susceptible to this crime type such as within the hospitality trade.

45.4 Pursue: This includes arrests, seizures and criminal prosecutions. Work takes place alongside public, private and third sector professionals to disrupt organise criminals, their associates, business endeavours and way of life.

- Identify offenders involved in modern slavery and bring to justice;
- Disruption of organised crime groups continuing to offend;
- Establish strong and effective collaborations to tackle modern slavery.

46. Department for Community and Children's Services (DCCS): has a responsibility to safeguard children and adults in the City of London, this responsibility is in conjunction with other agencies, as set out in the 'Working Together to Safeguard Children' guide to inter-agency working to safeguard and promote the welfare of children, published in July 2018. Further guidance is also available within the Pan London Safeguarding procedures for adults and children. The Joint City and Hackney Safeguarding Board for Adults and the corresponding Board for Children has oversight on the training and development of strategies on modern slavery, as does the Safer Community Partnership.

47. **Serious and Organised Crime (SAOC) Board:** The Board works to improve the collection, collation and analysis of data on modern slavery, including sexual and labour exploitation in order to understand and help mitigate the threat of these crimes.
48. **Public Protection and Environmental Health:** The City Corporation's Markets and Consumer Protection Department, amongst other remits, is responsible for regulating most of the premises within the Square Mile. As part of the Department's everyday duties they conduct inspections e.g. to ensure health & safety or food safety, at sites that may pose a risk of being associated with modern slavery including massaging and special treatment premises, construction sites, hotels, restaurants and street trading stalls. The team forms part of the Safer City Partnership and Serious and Organised Crime Board and responds to requests from HM Revenue & Customs and Police requests to look out for certain activities they are suspicious of.

d. Continuous improvement

49. **The City of London Police:** The comprehensive interventions that form part of the Action Plan on Modern Slavery and Human Trafficking detailed in part c) above will continue to be rolled out over the coming year. The effectiveness of these measures will be monitored alongside other policing objectives as part of the Force's overall approach.
50. **The Department of Community and Children's Services:** It is currently working with safeguarding partners, formally known as the Local Safeguarding Board for both Children and Adults on the development of a 'Joint Strategy for Modern Day Slavery'. The City of London has been tasked by the Board to develop a Strategy on Modern Slavery that focuses on the demography and needs of the City. There will be a focus on raising awareness around modern slavery across the City Corporation, including through training. Resources and ideas from both organisations will be pooled and lessons learned from similar local authority initiatives will be drawn on to create a meaningful and effective joint approach.
51. **Serious and Organised Crime (SAOC) Board:** The SAOC Board has identified modern slavery as a high priority threat that can have devastating impacts. It provides an advisory function and reports into the Safer City's Partnership. The SAOC will continue to find effective ways of raising awareness about modern slavery and working in partnership with agencies that intercept and dismantle organised crime groups, preventing them from profiting from modern slavery and human trafficking. Improved procedures to share intelligence on organised crime groups will be

developed with the eventual aim of preventing recruitment of vulnerable people into modern slavery.

52. **Community Safety:** Events aimed at raising awareness of modern slavery amongst City Corporation staff and City businesses will take place over the next year. These will be focused on helping delegates to recognise potential signs of modern slavery and to know what to do in such circumstances.

iv. **Our Wider Community**

a. **Remit and relevant risks**

53. This section covers the City Corporation's wider influence within surrounding boroughs, Greater London, the UK and further afield.
54. **City Bridge Trust:** The City Corporation plays a philanthropic role through the City Bridge Trust, which provides £20m per annum in grant funding across Greater London. The Trust supports work which reduces inequality and grows more cohesive communities for a London that serves everyone. The Trust aims for London to be a city where all individuals and communities can thrive, especially those experiencing disadvantage and marginalisation.
55. **Heart of the City:** runs the UK's only responsible business programme specifically designed to include SME's. This two-year Foundation programme equips and coaches business leaders to run successful companies that make a positive difference to people, places and the planet. Focusing on the practical, its events, online resources/templates and network are designed to support those companies new to responsible business with complex issues, such as tackling modern slavery. Heart of the City's network of contributor companies has responsible business expertise and resource in-house and they provide foundation members with support, mentoring and guidance. Funding from the City of London Corporation, City Bridge Trust and the City of Westminster Council has made places available for year one of the programme, enabling businesses to get involved without a designated responsible business budget.
56. Members of the network are businesses across a broad spectrum of industries, operating across London. The main risks of modern slavery within financial and other professional service industries are within their wider supply chain.

57. **The City of London Fairtrade Steering Committee** is administered by the charity JustShare on behalf of the City of London Corporation. Chaired by the Lord Mayor's Chaplain and attended by City Corporation Elected Members and relevant staff, the Recorder of London, Cheapside Business Alliance and various livery company representatives; it leads action on promoting fair trade within the Square Mile.

b. Policies and commitments:

58. Following a review of its charitable funding, the City Bridge Trust launched its new grant programme, 'Bridging Divides'. This programme has the following funding priorities: a) Connecting the Capital, b) Positive Transitions, and c) Advice & Support. These will help the Trust to achieve its vision for London to be a city where all individuals and communities can thrive, especially those experiencing disadvantage and marginalisation.

59. The City Corporation believes that the concept of fair trade is central to sustainable development and aims to be recognised by its stakeholders and partners as an organisation that actively supports and promotes the concept of Fairtrade and fairly traded products. In support of this commitment, the City Corporation signed its Fairtrade Resolution in 2007.

c. Existing interventions

60. **City Bridge Trust:** The Trust is currently inviting applications from specialist support services that will enable positive transitions in relation to children and young people, migrants and refugees, disabled people, ex-offenders and survivors of domestic and sexual abuse; modern day slavery; trafficking; and hate crime.

61. The Trust currently funds the 'Helen Bamber Foundation', which supports refugees and asylum seekers who have experienced human trafficking, 'Stop the Traffik', which aims to systemically disrupt global human trafficking and modern slavery networks by building resilient communities and the 'Human Trafficking Foundation', which was established to support and add value to the work of the many charities and agencies operating to combat human trafficking in the UK.

62. **Heart of the City** supports businesses to create and implement a responsible business strategy, focusing on increasing activities across four key areas – community, environment, workplace and marketplace. To date over 750 businesses (600 of which are SMEs) have completed the charity's Foundation programme. Each member is supported by an account manager and online resources including modules,

templates and tip sheets on ethical sourcing within procurement and tackling issues of modern day slavery.

63. **The Fairtrade Steering Committee** organises a number of events to promote fair trade and ethical sourcing more generally. In November 2017, it ran an event aimed at raising a broader awareness of modern slavery, which featured speakers from the City Corporation's Procurement team and the Cambridge Centre of Applied Research in Human Trafficking, alongside Baroness Young of Hornsey, sponsor of the Modern Slavery (Transparency in Supply Chains) Bill 2017-2019.

d. Continuous improvement

64. The Bridging Divides grant programme will see around £100m distributed over the next five years to tackle inequality across the Capital and will continue to fund organisations that help to tackle modern slavery in the UK and support its victims.

65. Heart of the City provides online resources for its members regarding responsible procurement as well as a guide to the Modern Slavery Act. Should a Foundation Programme member have specific questions, Heart of the City can connect them to a volunteer from a Contributor company (often larger firms). These experienced responsible business professionals should be able to assist or signpost elsewhere.

v. Our Supply Chains

a. Remit and relevant risks

66. City Procurement is the City Corporation's centralised procurement team who deal with the majority of contracts worth £10,000 or more. Exceptions to this include agreements between the Barbican and its artists and services commissioned by the Department for Community and Children's Services. Interventions described in this section relate to those contracts for supplies, services and works over the £10,000 threshold. Staff undertaking procurement exercises below this value on behalf of the Corporation will be encouraged to undertake online training to ensure they consider the risks of modern slavery as part of their due diligence processes.

67. City Procurement take the lead on tackling modern slavery within our supply chains, but work in conjunction with stakeholder departments with the greatest risk of procuring goods, services or works associated with this crime.

68. The highest risks of people falling victim to modern slavery in our UK-based supply chain include construction workers, those undertaking service contracts in relatively low paid industries such as cleaning, catering, security, agriculture and the care industry. Although not necessarily defined in the same way, the City Corporation recognises that those industries can often operate as part of the gig economy
69. The highest risks of modern slavery further up our globalised supply chain, especially forced and child labour, are associated with the production and manufacture of electronic equipment, textiles, agricultural commodities and construction materials. Conflict minerals including gold, tin, tantalum and tungsten, found in computer equipment and vehicles are also of significant concern.

b. Policies and commitments:

70. The City Corporation's [2015-2018 Responsible Procurement Strategy](#) aims to deliver best value in a way that improves the lives of those in its supply chain and help the City Corporation make procurement decisions that act as a catalyst for positive change. It is based on three pillars; social value, environmental sustainability and ethical sourcing. The latter details the City Corporation's commitment to tackling human and labour rights violations, including but not limited to modern slavery.

c. Existing interventions

71. **Commercial Contract Management (CCM):** The CCM team's role is to embed best practice consistently across the City Corporation's contract management provision, including supplier performance monitoring. The team have developed a 'Performance Scorecard' to ensure that a standard and robust approach is taken to monitor, gather evidence and handle risks or failing performance. One of the ten elements covered by the Scorecard is ethical sourcing and in particular; supplier compliance with the Modern Slavery Act.
72. All relevant suppliers that wish to tender for City Corporation contracts must provide evidence that they have met the requirements of the Modern Slavery Act 2015 in order to be able to bid.
73. A series of interventions are currently being used to ensure compliance with human and labour rights legislation, including the Modern Slavery Act, according to the nature of the contract in question. The following are interventions currently taken amongst our highest risk categories of spend:

- a. **Communities and Children's Services:** Services for vulnerable young people, such as care leavers, and vulnerable adults are monitored regularly to ensure that safeguarding requirements are in place. New services are commissioned using the Corporation's minimum safeguarding standards. These are based on the set of minimum expectations developed by The City & Hackney Safeguarding Children Board (CHSCB) and provide clarity to both commissioners and contractors of services as to what must be considered when engaging external services. Due diligence procedures include Disclosure and Barring Service (DBS) checks, reviews of safeguarding policies, procedures and complaints. Providers ability to meet these standards are tested through the procurement process.
- b. **Textiles:** As part of the City Corporation's current police uniform contract led by the Metropolitan Police, contractors are required to meet a strict corporate responsibility code of conduct covering product, environmental and ethical standards. Specific requirements include annual third-party audits, declarations of manufacturing facilities and registration with a shared audit database.
- c. **Electronic equipment:** Over the last year, the City Corporation has introduced ethical sourcing requirements within the specifications of contracts involving electronic equipment including closed circuit television (CCTV) cameras and multi-functional devices (MFDs). Within 12 months, contractors are required to produce a supply chain map highlighting key risks including forced and child labour. Subsequently the contractors establish a strategy, in collaboration with the City Corporation, to mitigate these risks. Specific actions may include strengthened contractual requirements with their own supply chain, internal or third-party auditing and/or affiliations with organisations who specialise in supply chain transparency. As part of its social value offering, the City Corporation's IT managed service provider is currently undertaking a supply chain mapping exercise on IT hardware used to support the services delivered to the City Corporation.
- d. **Construction materials:** The City Corporation is now taking a more robust approach to mitigating the risks associated with construction materials used as part of works contracts e.g. bricks, steel, timber, natural stone products etc. As part of the recently established intermediate and major works frameworks, the City Corporation requires contractors to present their current due diligence procedures within a month of contract

commencement. Feedback is then provided on any further interventions the City Corporation considers necessary. Proposals for continuous improvement are then developed by the contractor and mutually agreed as part of an ongoing action plan, which is monitored quarterly as part of ongoing key performance indicators (KPIs).

74. The Barbican, of which the City Corporation is the founder and principal funder, publishes its own annual [Modern Slavery statement](#). As committed to in its 2017/18 statement, the Barbican has recently introduced a standard clause in all its future contract for services and suppliers that commits suppliers to comply with the Barbican/City Corporation's Policies on modern slavery and human trafficking, both in engaging the supplier's own staff or in relation to sub-contractors and agents.
75. Additional clauses also recently introduced require suppliers to ensure they fulfil the obligations set out City Corporation's Equal Opportunities Policy and ensure all staff and all other people engaged or managed by external suppliers and visiting companies are treated with dignity and respect.
76. The City Corporation helped establish and co-Chairs the London Responsible Procurement Network (LRPN), a group of public sector representatives who meet regularly to share best practice and develop harmonised approaches to achieving social value, environmental sustainability and ethical sourcing. This Group also feeds into the London Heads of Procurement Network, facilitated by London Councils. A series of meetings and workshops dedicated to modern slavery have already taken place with the aim of sharing effective interventions and learning lessons from one another on how to effectively tackle modern slavery within London's public sector supply chains.

d. Continuous improvement

77. Over the next year, a 'Supplier Code of Conduct' will be developed by City Procurement with the aim of detailing the City Corporation's expectations more clearly to our supply chain and facilitating a more rigorous approach to contract management.
78. Work planned for the coming year to improve our approach to implementing appropriate due diligence procedures within specific high-risk categories includes:
 - a. **Construction Sites:** Moving forward, City Surveyors, the Department of the Built Environment and others involved in managing construction works on behalf of the City Corporation will work with City Procurement, City of

London Police and others to develop an approach to mitigating the risk of modern slavery taking place on its construction sites. It will involve the use of more detailed contractual provisions, awareness raising with supervisors on site and compliance checks. This work will take place alongside other action taken in response to increased levels of CSCS card fraud and incidences of illegal workers on UK construction sites.

- b. Textiles:** When establishing our new corporate uniform contract, the City Corporation will undertake an approach similar to that currently implemented in the existing police uniform contract, especially in regards to increased transparency of manufacturing locations and audit procedures.

- c. Food:** During the mobilisation period of the new corporate catering contracts, the City Corporation will work with its three catering contractors, as part of the CCM approach and through supplier relationship management, to ensure appropriate due diligence procedures are undertaken, especially in relation to mitigating risks of exploitation of workers involved in food processing, harvesting and the fisheries industry.

79. The City Corporation will continue to collaborate with other public sector bodies as part of the LRPN and with the London Heads of Procurement (LHoP) to improve its own approach to tackling modern slavery and share learning and best practice with other public authorities.

80. Through its Commercial Contract Management team, the City Corporation will form closer relationships with a broader set of key suppliers and use a partnership approach to identify and help mitigate the risks of modern slavery occurring in our global supply chains.



81. The City Corporation will refresh its Modern Slavery Statement annually; the next will be published in July 2019, which is more aligned to the organisation’s annual financial reporting. This new Statement will include updated policies and commitments, interventions, with a summary of progress made during November 2018 – June 2019 alongside future plans for continuous improvement.

Chief Officer sign-off: This Modern Slavery Statement was approved by the City of London Corporation's Summit Group on 26th September 2018

Signed: John Barradell Town Clerk

Elected Member sign-off: This statement was approved by the City of London Corporation's Policy and Resources Committee on 15th November 2018

Signed: Catherine McGuinness Chairman, Policy & Resources Committee