

2024-2029 Modern Slavery Statement Summary



Introduction

The City of London Corporation acknowledges its responsibility to identify and eradicate modern slavery within its operations.

Building on our previous statements, this document outlines the actions we have taken – *and continue to take* – to safeguard against any form of modern slavery occurring within **our organisation**, across **our jurisdiction**, and throughout **our supply chains**.

It is made pursuant to Section 54 of **the Modern Slavery Act 2015** ('the Act'). Although the City Corporation is not classified as a relevant commercial organisation under Section 54 of the Act, we made a clear commitment to publish a Modern Slavery Statement to align with our dedication to responsible business.

Part 1: Our Organisation

How we prioritise our commitment at the highest level, protecting and educating staff and taking dedicated action and collaborating across the City Corporation to combat modern slavery.

Core Policy Framework - Our commitment to ensure that the City of London offers the best place to live, work, learn, and explore is guided by our core policy framework of:

- **Our Corporate Plan 2024-2029:** All six outcomes of our Corporate Plan are and, through activities undertaken across the organisation and in partnership with our stakeholders, ensure impactful delivery of services.
- **Our People Strategy 2024-2029:** Working in parallel with our Corporate Plan, our People Strategy works to enable the City Corporation to become a world-class organisation by creating a culture that encourages excellent performance and embeds equality, equity, diversity, inclusion, and health and safety in everything we do.

Established Process, Policies and Commitments - We have committed to tackling modern slavery through an up-to-date suite of HR policies, including:

- Robust Committee Governance
- Recruitment Policy
- Whistleblowing Policy and Employee Assistance Programme
- Learning and Development Programmes
- Our Living Wage Commitment
- Codes of Conduct

Key Teams - The Town Clerk's Department, The People & Human Resources Department, Comptroller & City Solicitor's Department, Corporate Strategy & Performance.

Continuous Improvement and Progress.

- We have launched our Corporate Plan 2024-2029 and People Strategy 2024-2029 – each with clear outcomes to embed equality, equity, diversity, inclusion across our organisation with impactful delivery of services.
- We have conducted an internal review to ascertain how we can improve on our efforts to combat modern slavery. Recommendations have been taken forward to relevant Department leads and incorporated within this statement.
- To give corporate oversight, the Deputy Town Clerk has been appointed as Corporate Lead.
- We have continued collaboration through members of the CoLC Modern Slavery Working Group.

Part 2: Our Jurisdiction

How we minimise the risk of modern slavery occurring in any place the City Corporation has a presence, referring any victims to the help they need, and ensuring perpetrators are brought to justice.

Core Policy Framework - To combat modern slavery in our jurisdiction, we operate a clear approach outlined in:

- **Our City of London Policing Plan:** Outlines how policing will be delivered and sets out our policing priorities, whilst maintaining a commitment to our values of integrity, compassion and professionalism and the principles of the Police Code of Ethics.
- **National Legislation and Guidance:** Modern Slavery Act 2015, Modern Slavery Statutory Guidance, Children Act 2004, Care Act 2014, Homelessness Code of Guidance for local authorities, Licensing Act 2003, National Referral Mechanism (NRM) 2009.

Established Process, Policies and Commitments - We ensure a collaborative and robust approach to modern slavery in our jurisdiction through:

- [The Safer City Partnership Board](#)
- The Serious Organised Crime Board
- [Our Multi-Agency Child Exploitation \(MACE\) Group](#)
- [City Corporation Early Help services](#)
- [The City & Hackney Safeguarding Children Board \(CHSCB\)](#)
- [CBF Bridging London Strategy](#)

Key Teams - City of London Police (CoLP), Department of Community & Children's Services (DCCS), Port Health & Public Protection (PHPP).

Continuous Improvement and Progress

- We conduct Internal Service Development Plans and ongoing quality assurance measures (including practice reviews, observation, management oversight, and sign-off) monitor the day-to-day practice, impact, and user experience of services and enhance safeguarding response.
- We have modern slavery, exploitation and human trafficking training available to officers and staff through our commissioned training providers.
- We have established arrangements to monitor the successful implementation of the Modern Slavery and Human Trafficking '4P' Plan.
- The CoLP continue to develop partnerships across the community and within policing to improve the identification and response to modern slavery.
- The Children's Social Care and the City of London Police have joined forces to ensure any child stopped and searched is seen through a safeguarding lens and accesses early, supportive, intervention, that diverts from risks and harm.

Part 3: Our Supply Chains

How we use responsible procurement, contract management, and due diligence procedures to minimise risks of modern slavery taking place within our supply chains.

Core Policy Framework - Our commitment to responsible business is outlined and guided by our:

- **Responsible Procurement Policy:** Founded on three pillars: social value, environmental sustainability, and ethical sourcing. This policy underscores our commitment to addressing human and labour rights violations, including modern slavery.
- **Climate Action Strategy 2021-2027:** Ensures a Just Transition for the workforce, aiming to create decent work and quality jobs while safeguarding workers' rights and livelihoods.

Established Process, Policies and Commitments - We use robust processes, commitments and contract management to minimise the risk of modern slavery in our supply chains, including –

- Our Procurement Code: Rules 45 and 50
- Clear Contract Terms compliant with the Modern Slavery Act
- A dedicated Human Rights Toolkit for staff
- Annual Procurement Impact Reports
- Our City Corporation Fairtrade Resolution
- UN Global Compact signatory

Key Teams - The Chamberlain's Department - Commercial, Change, & Portfolio Management team.

Continuous Improvement and Progress

- The City Corporation has joined the newly formed London Responsible Procurement Network (LRPN) working group dedicated to modern slavery.
- The Commercial, Change, and Portfolio Management team has been created to better assess investment impact.
- A procurement governance review of the Commercial Service has begun to strengthen human rights and modern slavery due diligence throughout the commercial lifecycle.
- An Impact and Reporting function has been created to enhance transparency and measure the benefits of third-party spending and project investments, particularly in high-risk areas.
- An e-procurement system compliant with the new Procurement Act 2024 to provide the functionality to manage contracts through an e-system with alerts.
- The City Corporation will publish all six of our responsible procurement toolkits on our website alongside our Responsible Procurement Policy.
- Successful audit against the ISO 20400 standard for Sustainable Procurement.