

Modern slavery in local government supply chains

Transparency statement
guidance and procedures

Modern slavery in local government supply chains

To accompany existing guidance on Modern Slavery transparency statements¹, this guide is aimed to give you practical advice on how to draft your first statement; what to include; where to publish it and how to avoid some of the common pitfalls as well as offer some practical procedural suggestions when carrying out supply chain due diligence.

It can also be used to assist those looking to build on previous statements; to implement year-on-year improvements and evidence the practical progress on how you are tackling the risks and incidence of Modern Slavery in your operations and supply chains.

Mandatory requirements	
Do	Don't
Publication and accessibility	
Report annually on the past financial year within six months of your organisation's financial year-end	Report either in advance of the end of a financial year or after six months of your organisation's financial year
Improve the statement year on year – it is a live document	Reproduce your old statement with minor word changes or merely altered dates
Keep a record of old statements accessible to the public (providing URL links etc). This allows for progress to be monitored	Delete old statements, only have the current statement publicly available
Publish the statement in a prominent place on your website, eg bottom of homepage or obvious drop-down menu	Publish it in a place difficult to find or password protected
Formulation and approval process	
Ensure the statement is approved at the highest level and signed by a senior member of the organisation (chief executive/leader of the council); providing their post and name, signature and approval date	Leave the statement unsigned/dated or in draft format; simply state it has been approved without specifying
Ensure the statement is a genuine reflection of your business, practices, and culture	Use templates without making the statement your own
Formulate the statement as a collaboration between departments, with procurement teams leading and others participating eg human resources, legal and safeguarding teams	Leave it to one department or person to write the statement without input and contribution of others
Provide relevant information in your statement with sufficient detail	Use the statement to showcase non-Modern Slavery and human rights related activities and overwhelm the reader with excessive details, ie too much legal or technical information

Substantive content of statements	
Do	Don't
Organisational policies	
Showcase your Modern Slavery policy if you have it and explain the link between your existing policies and Modern Slavery	List or reproduce all of your organisational policies
Amend existing policies to include references to Modern Slavery or create a standalone Modern Slavery policy	Refer to policies that have no relation to Modern Slavery
If approving a standalone Modern Slavery policy, clearly set out the obligations on staff, suppliers, business partners and agents, as well as procedures to be followed	Create a Modern Slavery policy composed of a collection of empty statements with no clear impact on your council's work and behaviour eg. merely referring to a zero-tolerance approach is not enough
Clearly state who is responsible for the implementation of the relevant policies, how implementation will be monitored and how it should be reported on	Publish a policy without a responsible department/person and an enforcement, reporting and review mechanism
Circulate policies in your organisation and relevant parties to make it known to all and explain how this is done in the statement	Have policies your staff, constituents and customers, business partners, suppliers and other stakeholders don't know about and wouldn't be able to find unaided
Due diligence: identifying and prioritising risks	
Show you understand the risks of abuse your organisation and practices pose: <ul style="list-style-type: none"> towards your own staff related to recruitment practices (including use of agencies) related to sub-contracting related to the products/services you procure in your supply chains. 	Reproduce the risks found in other statements or templates without assessing how they relate to your own practice and suppliers
Consider risks associated by country; sector; transaction; and business partnerships as set out in Tackling Modern Slavery in Government Supply Chains Guide for Commercial & Procurement Professionals ²	State that procuring solely from the UK means your supply chains are at a low or no risk of Modern Slavery. Modern Slavery is occurring every day in public sector supply chains in the UK
Highlight your high-risk areas, whether product or service based, in your supply chain	Merely list all products or services procured
Prioritise risks and focus on high-risk supply chain mapping	Try to map all of the supply chain at once
Understand that risks may change	Reproduce the same risks year on year in your statement

Substantive content of statements	
Do	Don't
Due diligence: preventing, mitigating and remedying abuses	
<p>Ensure that you have functioning and responsible procurement and contract management due diligence procedures to minimise risks of modern slavery taking place within domestic and global supply chains. For example:</p> <ul style="list-style-type: none"> • referrals, site visits and spot checks • contractual provisions and contract monitoring and management • asking for suppliers to provide their own due diligence of their sub-contractors and supply chains • use online modern slavery risk identification and management tool such as the government's Modern Slavery Assessment Tool (MSAT)³ 	<p>Do not make ambiguous and generalised declarations stating that you take all appropriate measures without providing details</p>
<p>Seek assurances from suppliers during the tendering process. Ask the questions up front and probe responses, where appropriate</p> <p>Pre-procurement specification, questionnaires and checklists can be found in Tackling Modern Slavery in Government Supply Chains⁴</p>	<p>Solely rely on a checklist and allow this to become a tick box exercise</p>
<p>Introduce Modern Slavery related clauses into contracts and terms and conditions and use them to engage with suppliers meaningfully, making your expectations clear</p>	<p>Simply inform suppliers of your policies or ask them for theirs and seek vague anti-slavery assurances</p>
<p>Work with suppliers to create action plans, take corrective measures, and if suppliers refuse to cooperate, consider measures against them</p>	<p>Immediately terminate the business relationship</p>
<p>When contracting services robustly question recruitment processes</p>	<p>Use minimal vetting techniques, or state that you use 'reputable recruitment agencies' which you have not assessed</p>
<p>Report on planned monitoring and auditing measures for your own sites and sites of your suppliers</p>	<p>Outsource the responsibility to your suppliers, merely assuming they will carry out adequate monitoring</p>
<p>When using third party audits engage in the process and create action plans</p>	<p>Rely on the audit without a follow-up</p>
<p>Identify and report violations, and address how you will mitigate them</p>	<p>Hide or dismiss violations or rely on suppliers to resolve them when they take place lower down in your supply chain</p>

Substantive content of statements	
Do	Don't
Establish Modern Slavery working groups internally in which relevant departments are involved to address instances where you have identified risks or actual abuse	Make due diligence the responsibility of one sole individual or department in the institution – it is an organisation wide process
Review these procedures annually and continuously seek to innovate and improve on these over time	Be complacent that current due diligence practices will always mitigate the risk of Modern Slavery in your supply chains – unscrupulous suppliers will always be looking for new ways to exploit the situation
Collaborating with external partners	
Provide details of your collaboration with external partners, including the measures taken	Sign up to partnerships or collaborations, expecting for them to resolve the problem for you
Collaborate within your sector and share good practice	Treat the statement as a competition or a trade secret
Seek to collaborate with organisations working in different sectors that can help you manage modern slavery risks – for example Electronics Watch ⁵ who provides intelligence, collaboration and support about working conditions in factories that assemble ICT	Think you can combat Modern Slavery on your own, pooling resources and intelligence will often be required
Measuring effectiveness and planning for the future	
Report on how you will measure effectiveness and who is responsible for this measurement	State the procedures have been reviewed without indicating the assessment and impact they had
Provide information on existing Key Performance Indicators (KPIs)	Make ambiguous and general commitments for the coming years
Ensure KPIs are Modern Slavery related, including responsible procurement KPIs	List commitments which are not directly relevant
Track progress at short, medium and long term, and allow for substantive measurement	Fail to assess and report on the effectiveness of measures undertaken
Review your aims, goals and KPIs annually, with distinct future goals	Reproduce the same KPIs year on year without measuring their effectiveness
Be honest, if you've not had much success it's fine to be upfront about this whilst striving to improve in the future	Be afraid of publishing a lack of progress or hide setbacks

Substantive content of statements	
Do	Don't
Training and capacity	
Provide Modern Slavery specific training which is relevant to your organisation	Cite training unrelated to Modern Slavery in your statement or provide training which is not relevant to your work
Provide training to all staff, including refreshers and new courses.	Reduce Modern Slavery training to induction processes for new staff
Provide targeted Modern Slavery supply chain and contract management training for relevant staff, especially to procurement teams, contract managers, trading standards, compliance, legal and finance teams	Use a one fits all approach
Use external and internal training	Outsource all training responsibilities to consultants

Endnotes

- 1 www.gov.uk/government/publications/transparency-in-supply-chains-a-practical-guide
- 2 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/830150/September_2019_Modern_Slavery_Guidance.pdf
- 3 <https://supplierregistration.cabinetoffice.gov.uk/msat>
- 4 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/830150/September_2019_Modern_Slavery_Guidance.pdf
- 5 <https://electronicswatch.org/en>

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Further resources can be found on the LGAs Modern Slavery in the Supply Chain Hub: www.local.gov.uk/topics/community-safety/modern-slavery/supply-chains



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