



## City of London Corporation Modern Slavery Statement

1. At the City of London Corporation, we are committed to upholding the highest standards of ethical governance and transparency in our operations.
2. This Modern Slavery Statement continues the work laid out in our 2018 and 2021 statements, outlining 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 organisation, within the Square Mile, or within our supply chains.
3. This Modern Slavery Statement 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 have made a clear commitment to publish a Modern Slavery Statement to align with our dedication to responsible business.
4. 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.
5. This Modern Slavery Statement sets out the steps the City Corporation is taking in a) discharging its functions to ensure that modern slavery is not taking place in its business, jurisdiction or supply chains, and b) to use its wider influence to reduce modern slavery risks and impacts. It is divided into three sections:

**Part 1: Our Organisation** - Prioritising our commitment at the highest level, protecting and educating staff and taking dedicated action and collaborating across the City Corporation to combat modern slavery.

**Part 2: Our Jurisdiction** - Minimising the risk of modern slavery occurring in the City of London and on City Corporation property, referring any victims to the help they need, ensuring any perpetrators are brought to justice and helping to identify modern slavery in any place the City Corporation has a presence.

**Part 3: Our Supply Chains** - Using responsible procurement and rigorous contract management to mitigate the risk of modern slavery taking place within our UK supply chain,

and effective due diligence procedures to minimise the risks of using global suppliers who contravene human and labour rights and exploit people through modern slavery.

## Part 1: Our Organisation

6. This Section outlines how the City Corporation prioritises our commitment at the highest level, protecting and educating staff and taking dedicated action and collaborating across the City Corporation to combat modern slavery.
7. It is intended this Statement will be valid for the period from 2024-2029 in line with our Corporate Plan and People Strategy, with any required textual changes to be updated annually. Our efforts to combat modern slavery will be reflected in respective Departmental and Institutional reporting.

### The City of London Corporation

8. The City Corporation has a long history, a unique constitution, our own Lord Mayor, and a dedicated police service keeping the City safe.
9. The City of London Corporation looks after the City of London ('the City' or 'Square Mile') on behalf of all who live, study, work, and visit; providing modern, efficient, and high-quality local services and policing for all.
10. Aside from acting as a key spokesperson for the UK's Financial and Professional Services sector, we support London's communities through responsible business, as the corporate Trustee of a number of charities, including City Bridge Foundation, providing schools and skills for young people, and delivering affordable housing across London.
11. Beyond the City boundaries, our organisation's responsibilities to providing a host of additional facilities for the benefit of the nation including air and seaports, charitable giving, the Guildhall School of Musica and Drama, the Barbican Centre and over 11,00 acres of open spaces.

### Our Corporate Plan 2024-2029

12. 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. Launched in April 2024, our [Corporate Plan 2024-2029](#) guides planning and decision-making for the City of London Corporation through six strategic outcomes, reflecting the vast portfolios covered by the City of London Corporation.

13. The six Corporate Plan outcomes are as follows:

- [\*\*Vibrant Thriving Destination\*\*](#) — Attracting businesses and people to a safe, secure, and dynamic location is vital to our future. A world-leading culture and leisure offer is integral to creating a vibrant, thriving destination where everyone prospers.
- [\*\*Providing Excellent Services\*\*](#) — Supporting people to live healthy, independent lives and achieve their ambitions is dependent on excellent services. Vital to that continued pursuit is enabling access to effective adult and children’s social care, outstanding education, lifelong learning, quality housing, and combatting homelessness.
- [\*\*Diverse Engaged Communities\*\*](#) — Across our residents, workers, businesses, and visitors, everyone should feel that they belong. Connecting people of all ages and backgrounds will help build diverse, engaged communities that are involved in co-creating great services and outcomes.
- [\*\*Dynamic Economic Growth\*\*](#) — The City of London is the engine in the country’s economy. Driving dynamic economic growth in financial and professional services at local, national, and international levels will create jobs, attract investment, and support businesses across communities and the country.
- [\*\*Leading Sustainable Environment\*\*](#) — We have a responsibility to ensure that we act as a leader on environmental sustainability and strive to enhance it in all aspects of how we work. Climate action, resilience, air quality, and sustainability are all facets of ambitious targets for the entire City to be net zero by 2040.
- [\*\*Flourishing Public Spaces\*\*](#) — From our markets and cultural icons, such as the Barbican, to our world-famous bridges and amazing green spaces, we are stewards of unique national assets. Major capital investment into our civic fabric will secure flourishing public spaces, enabling a more successful London overall.

14. Though this statement principally supports our ambition to Provide Excellent Services, all six outcomes are interlinked and delivered through activities across the organisation and in partnership with our stakeholders to ensure impactful delivery of services.

## People Strategy 2024-2029

15. Launched in parallel with our Corporate Plan, our [\*\*People Strategy 2024-2029\*\*](#) works to enable the City Corporation to become a world-class organisation. It does so by creating a culture that encourages excellent performance and embeds equality, equity, diversity, inclusion, and health and safety in everything we do.

16. Our People Strategy emphasizes a key theme of *'My Wellbeing and Belonging'* where we outline our work to ensure our people feel physically and psychologically. It outlines specific measures to support our staff in this regard which include but not limited to:

- Introduce an anonymous HR reporting system and process to investigate and resolve employee complaints
- Research, benchmark and implement a holistic and proactive wellbeing offer to create consistent conditions for our people to flourish
- Undertake an annual employee survey, creating collective and individual action plans and connecting these directly to future year people strategy initiatives.

## Our People, Our Policies and Our Commitments

17. Underpinning our People Strategy, the City Corporation has a suite 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.

18. These policies and processes are managed and overseen by the People and Human Resources Department and guidance is provided to all recruiting managers to ensure these checks are carried out effectively.

19. 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 – they include:

- **Recruitment Policy:** The City Corporation enforces a strict recruitment policy, including mandatory 'right to work in the UK' checks for all employees. Employment offers are conditional on satisfactory completion of these checks. For employees on a visa or work permit, continued employment requires proof of ongoing right to live and work in the UK. These processes, overseen by the People and Human Resources Department, are designed to prevent the illegal employment of trafficked or coerced individuals.
- **Whistleblowing Policy:** The City Corporation's Whistleblowing Policy applies to all staff, offering clear channels to raise serious concerns without fear of reprisal. This includes reporting potential instances of modern slavery or other forms of abuse and coercion. Staff are informed of this policy through induction training and the staff intranet.
- **Employee Assistance Programme:** 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.

- **Learning and Development Programs:** People and Human Resources ensures easy access to HR policies via the Employee Handbook, HR Topics pages, Managers' Guide, and New Starters' Resource on the intranet. Changes or new policies are communicated through training workshops, e-learning, team meetings, and staff/manager news updates. The City Corporation also offers a one-hour e-learning course on modern slavery to raise awareness and help staff and Members identify and report concerns.
- **Our Living Wage Commitment:** 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 subcontractors 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, as well as any person working under any of our contracts for two or more hours.
- **Codes of Conduct:** Our success depends on public trust, so all staff and elected representatives must uphold the highest standards of conduct and integrity, including adherence to the Nolan Principles. The City Corporation's 100 Common Councilmen and 25 Aldermen, known as 'Members,' represent public interests and follow the City Corporation's Code of Conduct.

Similarly, employees must follow the Employee Code of Conduct, which includes anti-corruption measures and promotes fairness and equality. Employees, suppliers, and stakeholders are encouraged to report serious concerns, which are addressed under the Whistleblowing or Complaints Policy, the Public Interest Disclosure Act, the Human Rights Act, and, when relevant, the Anti-Fraud and Corruption Strategy.

## Governance & Accountability

20. The City of London Corporation operates under a historic and distinct governance system. Corporate oversight and governance are principally conducted through a committee system, each responsible for oversight and accountability for given remits. Meanwhile, the City Corporation's Town Clerk and Chief Executive, with respective Chief Officers, oversee day-to-day operations and delivery.
21. The primary Member-led bodies with responsibility for services which work towards preventing modern slavery are as follows:

- **Court of Common Council** — With 100 elected Common Councillors and 25 Alderman, the Court of Common Council serves as the principal decision-making body.
- **Policy and Resources Committee** — Oversees governance and considering matters of policy and strategic importance to the City of London Corporation including matters referred to it by other Committees and/or Chief Officers. It directs economic development initiatives and promotes the City of London as a global financial hub.
- **City of London Police Authority Board** — Delegated by the Court of Common Council, the Board ensures the City of London Police operates effectively, holds the Commissioner accountable, and sets priorities that enhance community safety and protection.
- **Community & Children's Services Committee** — Manages Children's and Adults' Services, Education, and Social Services, overseeing care and support to promote the safety and well-being of residents and addressing issues related to safeguarding and care.
- **Corporate Services Committee** — Oversees personnel and staffing for the City of London Corporation, including all graded and non-graded employees, employees on the professional payrolls, staff, and including casual workers, across Corporation departments and Institutions. They ensure employment practices support the well-being of staff and uphold best practice.
- **Licensing Committee** — This Committee manages the City of London's licensing under the Licensing Act 2003 with several key objectives, including: preventing crime and disorder, ensuring public safety, preventing public nuisance, and protecting children from harm.

## Continuous Improvement and Progress

22. A Corporate Plan and People Strategy have been launched – each with clear outcomes designed to embed equality, equity, diversity, inclusion across our organisation and enable impactful delivery of services.
23. In 2023, an internal review was conducted 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.
24. The Deputy Town Clerk (DTC) has been put forward by the Town Clerk's Executive Leadership Board as Corporate Lead. for the Corporation's Modern Slavery Statement, to be supported by a Modern Slavery Strategic Lead, to help coordinate delivery of our Modern

Slavery Statement. This will give corporate oversight and support in the publication of our Modern Slavery Statement commitments.

25. This statement is a product of continued collaboration through members of the CoLC Modern Slavery Working Group.

## Part 2: Our Jurisdiction

26. This Section outlines how the City Corporation minimizes the risk of modern slavery occurring in the City of London and on City Corporation property, referring any victims to the help they need, ensuring any perpetrators are brought to justice and helping to identify modern slavery in any place the City Corporation has a presence.

### The Safer City Partnership Board

27. The City Corporation takes a collaborative approach across all our service departments and multi-agency partners to ensure that comprehensive support is available to protect children, families, and adults from harm and exploitation.
28. Much of this comes together through the [Safer City Partnership Board](#) – the statutory community safety partnership for the City of London. It brings together statutory agencies, known as the Responsible Authorities, and invited and co-opted participants with the role of keeping the Square Mile safe. The Responsible Authorities are as follows:

#### **Responsible Authorities (Statutory Members)**

- The City of London Corporation
- The City of London Police
- London Fire Brigade
- NHS North East London Integrated Care Board
- The National Probation Service – London

#### **Invited and co-opted participants**

- British Transport Police
- London Ambulance Service
- East London Foundation Trust
- The Guinness Partnership
- City and Hackney Public Health
- City and Hackney safeguarding Adults
- City and Hackney safeguarding children
- Victim Support

- City of London Crime Prevention Association
- Safer Business Network
- City of London Business Improvement Districts

## The City of London Police (CoLP)

**29.** The City of London Police's action plan on Modern Slavery and Organised Immigration Crime uses a four-pronged approach based on **protection, preparation, prevention** and **pursuit**:

- **Protection** focuses on identifying and safeguarding victims. This includes providing support services, such as shelter and medical care, and connecting victims to the National Referral Mechanism (NRM). The police work closely with other agencies to remove individuals from harmful situations and prevent further exploitation.
- **Preparation** involves training officers to recognise signs of modern slavery and exploitation. The plan also strengthens partnerships with local authorities, businesses, and other organisations to enhance intelligence gathering and improve the police's ability to respond effectively to these crimes.
- **Prevention** aims to reduce the occurrence of these crimes by raising public awareness and working with businesses to prevent exploitation within supply chains. Additionally, the police collaborate with at-risk communities to provide support and create a hostile environment for organised crime groups (OCGs).
- **Pursuit** focuses on investigating, prosecuting, and disrupting offenders and OCGs involved in modern slavery and organised immigration crime. This includes targeting the financial operations of criminal networks and working with national and international partners to dismantle these organisations.

**30.** Due to the nature of the crime, many victims are hidden out of sight, may not know they are victims, and/or may not present as a victim initially. Outside of exploring the data of those victims managed under National Referral Mechanism or direct reports into Police it difficult to accurately quantify the true scale of this crime. Beyond those sources mentioned there is no definitive data source or method to accurately capture the number of victims in the UK, including the Square Mile, therefore there is a high reliance on the creation of opportunities for generation of community and wider intelligence. CoLP are committed resources to assist in developing intelligence in this way to better understand the threat , harm and risk picture within the Square Mile.

**31.** The City of London Police are focused on continuous improvement of data quality recorded, specifically around nationality of victims and suspects, location of offence and dates of exploitation to assist in generating opportunities and activity for prevention and pursuit of

offenders. This includes seeking to gain licenses for CoLP for the Traffik Analysis Hub - run by [Stop the Traffik](#) - to develop our overall intelligence picture locally, regionally and nationally.

32. In addition, the CoLP supports the Modern Slavery and Organised Immigration Crime (MSOIC) Programme, which focuses on identifying and protecting victims, preventing reoffending, disrupting criminal activities, and breaking the business models of Organised Crime Gangs (OCGs).

## The Department of Community and Children's Services (DCCS)

33. DCCS has a wide remit to provide care and support to the 8,600 residential and 614,500 worker population of the City of London. Within DCCS, the People's Department provides comprehensive, consent-based and statutory safeguarding services for all City residents – covering Adult's Social Care, Children's Social Care and Early Help, Homelessness and Rough Sleeping, and Safeguarding & Quality Assurance.
34. Their work is guided by statutory regulations and legislation. For modern slavery, this includes the [Modern Slavery Act 2015](#) and its accompanying statutory guidance. This framework is further supported by broader safeguarding laws, including the [Children Act 2004](#), [Care Act 2014](#), and the [Homelessness Code of Guidance for local authorities](#). Plus wider multi-agency partnership safeguarding strategies such as the [CHSAB Strategy 2020-2025](#).
35. When significant harm or modern slavery is identified, the department takes immediate action to remove individuals from danger, safeguard them, and provide services to address trauma and prevent recurrence. The department refers cases of exploitation and trafficking to the [National Referral Mechanism \(NRM\)](#) through our dedicated Single Point of Contact.
36. This response is coordinated with partner agencies to create a robust support network around victims, providing immediate support, including emergency accommodation, and raising awareness among partners and staff to recognise and act on indicators of exploitation. In all cases, the safety of victims pursuing prosecution is prioritised, recognising the risks posed by exploiters.
37. The [Multi-Agency Child Exploitation \(MACE\) Group](#), chaired by the Head of Children's Social Care and attended by multi-agency partners, meets regularly to monitor issues such as criminal and sexual exploitation, trafficking, gangs, county lines, and modern slavery. This group ensures that trends are understood, and appropriate responses are in place to support victims and disrupt exploiters. Additionally, street-based outreach services provide direct, location-based support to homeless individuals, offering immediate advice and referrals to services.

38. [City Corporation Early Help](#) services are readily available to children and families to address emerging needs and prevent the escalation of vulnerabilities. This includes a universal youth service that encourages participation in extracurricular activities, reduces social isolation, and provides safe community spaces for children.
39. The City Corporation also has a dedicated commissioning team within the Community & Children's Services department, particularly for vulnerable young people, such as care leavers, and vulnerable adults. These services are regularly monitored to ensure safeguarding requirements are met. New services are commissioned using the City Corporation's minimum safeguarding standards, based on the expectations set by [The City & Hackney Safeguarding Children Partnership \(CHSCP\)](#). Due diligence procedures include Disclosure and Barring Service (DBS) checks, and reviews of safeguarding policies, procedures, and complaints, with providers' ability to meet these standards tested during the procurement process.

### Port Health and Public Protection (PHPP)

40. PHPP teams provide comprehensive and effective environmental health, trading standards, air quality and licensing services for the City of London, ensuring that, through monitoring, regulation and enforcement, City residents and businesses can enjoy an environment and services which are, so far as possible, safe and without risks to their health or welfare.
41. As per of their core duties, Public Protection officers frequently visit sites in the Square Mile posing risks of modern slavery and are vigilant in observing and reporting any suspicious circumstances.
42. Officers work closely with the City of London Police, Border Force, other external services – such as the Licensing Liaison Partnership - and other City Corporation services. Together, they collaborate on issues related to exploitation and modern slavery, with ongoing efforts focused on addressing concerns at specific locations.

### Supporting Our Wider Community

43. [City Bridge Foundation](#) ('CBF' or 'the Charity') was established over 900 years ago and now manages and maintains five of London's city Bridges, at no cost to the taxpayer. They are powered through property and financial investments, initially supported and funded by medieval Londoners to maintain the first stone London Bridge. Funds surplus to the Bridges' needs are distributed each year to organisations that are working for a fairer, greener capital — via our funding team.
44. The City Corporation has a wider influence within surrounding boroughs, Greater London, the UK and further afield. We are committed to work together to ensure our approach to modern slavery is shared beyond our immediate jurisdiction.

45. Through our charitable funding, last year the charity provided £688,000 in grants specifically aimed at addressing modern slavery.
46. The City Corporation, acting by the Court of Common Council, is the charity trustee of CBF and carries out its functions as trustee in accordance with the City Corporation's internal governance framework, including through authority delegated to the CBF Board and its Committees, and to officers.
47. CBF's focus on Equity, Diversity, and Inclusion (EDI) supports initiatives that address conditions leading to exploitation and modern-day slavery. This includes funding and support for marginalized groups and those vulnerable to human trafficking. By promoting ethical treatment in supply chains and providing long-term, flexible finance for social change, CBF actively contributes to combatting modern-day slavery.
48. The Charity's vision, outcomes and values are set out in its overarching strategy 'Bridging London'. The vision is for London and Londoners to be truly connected. CBF aims to address the systemic causes that lead to modern slavery by supporting vulnerable populations, through its convening power and advocacy, and through collaborations and partnerships.
49. CBF will continue to evaluate its influence and collaborate with other funders and stakeholders to effectively tackle modern-day slavery.
50. [Heart of the City](#) runs a responsible business programme specifically designed for Small and Medium-sized Enterprises based in the UK to become a force for good. With the City of London Corporation having helped establish and fund Heart of the City, both share a commitment to fostering a sustainable and ethical business environment.
51. 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, resources and guidance.

## Continuous Improvement and Progress

52. The City of London Police, and the City of London Corporation more widely, continues to develop partnerships across the community and within policing to improve the identification and response to modern slavery.
53. Internal Service Development Plans, updated quarterly, drive practice improvements to enhance safeguarding responses, while the Children's Safeguarding Partnership and City and Hackney Adult's Safeguarding Board monitor and improve multi-agency safeguarding efforts.

- 54.** In addition, regular performance monitoring and statutory reporting continue to ensure that services are delivered at the right time to meet the needs of City residents. These ongoing quality assurance measures, including practice reviews, observation, management oversight, and sign-off, monitor the day-to-day practice, impact, and user experience of our services.
- 55.** Recognising the importance of appropriate training, a range of modern slavery, exploitation and human trafficking training is provided to workers in People's Services through our commissioned training providers.
- 56.** For the City of London Police, this includes enhanced training for officers and staff around spotting the signs of exploitation, with a focus on areas which have limited information and/or intelligence, such as sexual and labour exploitation. This includes:
- All front-line officers and custody staff have now received modern slavery training inputs
  - 14 officers have completed the four-day modern slavery investigator course
  - 17 officers have completed the specialist modern slavery victim liaison course
  - Staff from Learning and development have attended an MSOIC train the trainer course and the next cycle of vulnerability training in force will focus on MSOIC and delivered to all staff
  - And new guidance has been issued for officers around a uniform way to record NRMs on across record systems at the City of London Police.
- 57.** To ensure clear records across our services, Children's and Adults' Services operate a clear duty system to respond immediately to safety concerns, supplemented by an out-of-hours service. Here, Children's Social Care and Early Help and Adult's Social Care utilise the Mosaic 'Warnings' system, creating a red alert on the person summary page to notify any who access the record that there are warnings in place which indicate risk and high vulnerability across our service records.
- 58.** Children's Social Care and the City of London Police are operating a collaborative project which ensures any child stopped and searched is seen through a safeguarding lens and accesses early, supportive, intervention, that diverts from risks and harm.
- 59.** CBF is expanding its responsible business practices to create a more positive impact by adding new roles focused on EDI and Climate Action. These roles will ensure a commitment to social justice, fostering an equitable, inclusive, and diverse environment that promotes ethical treatment in supply chains and works to prevent exploitation and forced labour.

## Part 3: Our Supply Chains

- 60.** The City Corporation spends around £151 million annually on goods and services, with an additional £292 million allocated to construction works. These contracts support a wide range of services across the City Corporation and its institutions, including the Barbican Centre, City of London Police, and City Bridge Foundation.
- 61.** This Section outlines how the City Corporation is using responsible procurement and contract management due diligence procedures to minimise risks of modern slavery taking place within our domestic and global supply chains.

### Our Domestic Supply Chains

- 62.** The highest risks of modern slavery in our UK supply chain are found in entry-level roles across construction, security, waste management, cleaning, laundering, food harvesting, processing, and care industries—sectors typically filled by agency, seasonal, and migrant workers with low skill levels or without formal UK qualifications. Although not necessarily defined in the same way, the City Corporation recognises that those in the latter industries can often operate as part of the gig economy.

### Our Global Supply Chains

- 63.** Globally, the greatest risks, particularly forced and child labour, are linked to the production of electronics, textiles, agricultural commodities, and construction materials. Conflict minerals like gold, tin, tantalum, tungsten, lithium, cobalt, copper, and nickel—used in electronics and electric vehicles—are also a significant concern.

### The Commercial, Change and Portfolio Management Team

- 64.** The Commercial, Change, and Portfolio Management team oversees centralised and responsible procurement for contracts over £100,000, focusing on supplies, services, and works. This team leads the City Corporation's efforts to tackle modern slavery in supply chains, working with stakeholders and contract managers to mitigate risks and ensure best practices.
- 65.** They monitor supplier performance and incorporate modern slavery and human rights safeguards throughout every stage of procurement. The team now includes an Impact and Reporting function to measure and communicate the value of investments, improving data and transparency.

## Training and Development

- 66.** All commercial services personnel receive responsible procurement induction and training from the Corporation's Responsible Procurement Manager. Responsible Procurement is also a module in our Commercial Academy, an e-learning course accessible to all City Corporation officers. This year (May – June 2024), a 'refresh' series was delivered, featuring sessions on each responsible procurement commitment with practical steps for implementation. The series was recorded and is available to officers.
- 67.** Additionally, a toolkit has been developed for each of the six responsible procurement commitments. It explains the importance of each commitment, outlines actions for each stage of the commercial lifecycle (pre-procurement, procurement, and contract management), and provides relevant contacts for reporting.

## Procurement Processes

- 68.** Before starting a procurement exercise, our buying team assists departmental stakeholders in exploring procurement options. All relevant suppliers wishing to tender for City Corporation contracts must provide evidence of compliance with the Modern Slavery Act 2015 to be eligible.
- 69.** Procurement frameworks, which include pre-approved suppliers with agreed terms and conditions for specific goods, works, or services, are another available option. As part of due diligence, our buying officers ensure that framework providers comply with the Modern Slavery Act, and address any gaps if necessary. For high-risk categories of spend, officers must include specific wording in specifications requiring suppliers to conduct due diligence or be prepared to do so upon request. The Human Rights toolkit provides specification wording and questions for officers to include in their tenders.

## Contract Monitoring

- 70.** The City Corporation has made ambitious commitments to reducing carbon emissions through sustainable procurement, while also ensuring that the transition to a low-carbon economy does not marginalize people or violate human rights. To address this, the City Corporation has recruited temporary resources to specifically review 40 of our suppliers through a Just Transition lens and identify practical actions for both this year and the five-year action plan.
- 71.** A framework, based on the [SDGs World Benchmarking Alliance Transition Methodology](#), and [International Labour Standards](#), was developed, followed by a risk assessment. For suppliers identified as high or medium risk, an action plan will be created, which may include supplier training, workshops, updates to the Human Rights toolkit, and revisions to procurement specifications and tender questions, as well as internal officer training.

72. To focus on modern slavery risks, we assessed the modern slavery statements of 40 of our top suppliers using the [Government's Modern Slavery Assessment Tool \(MSAT\)](#). Scores ranged from 31/156 to 151/156, with an average of 66/156. In the coming year, we will engage with suppliers to improve their approach to modern slavery through category training, one-on-one conversations, and collaboration with commercial leads.
73. Additionally, in early 2024, the Responsible Procurement team implemented a Modern Slavery in the Supply Chain Due Diligence Report, requiring suppliers to detail their due diligence efforts and planned actions for the specific financial year. This report has been used for major facilities management and minor works contracts.
74. A 'Performance Scorecard' is also available to contract managers to ensure a standardized and robust approach to monitoring, gathering evidence, and addressing risks or performance issues. One of the ten elements covered by the Scorecard is ethical sourcing, particularly supplier compliance with the Modern Slavery Act.

## Continuous Improvement and Progress

75. The City Corporation helped establish and is an active member of the London Responsible Procurement Network (LRPN). This group of public sector representatives meets regularly to exchange best practices and develop strategies for social value, sustainability, and ethical sourcing. The group focuses on modern slavery, sharing interventions and learning how to address it in public sector supply chains. Their goal is to use their collective influence to reduce modern slavery and human rights risks, with efforts directed at improving training and due diligence.
76. A comprehensive procurement governance review is underway, starting in summer 2024 and expected to run into 2025. This review will assess governance, practices, spending behaviours, and roles to improve efficiency and compliance. The review aims to strengthen the City Corporation's due diligence on human rights and modern slavery, with updates to procurement templates for high-risk areas. Expected outcomes include:
- A risk-assessed compliance audit
  - An improvement plan for procurement and contract management
  - A commercial assurance framework with updated data and reporting requirements
  - A corporate capability assessment and training plan
  - An updated Procurement Code
  - Revised officer-level governance proposals
77. Officers are developing a new e-procurement system following the introduction of the [Procurement Act 2023](#), featuring contract management and alert functions. This system will

integrate the current commercial scorecard and may be updated following the review. Led by the City Corporation's Strategic Contract Management Lead, this project will enhance visibility on responsible procurement and modern slavery issues.

78. The temporary position on secondment from Westminster City Council, 'Responsible Procurement Officer – Just Transition', will engage with suppliers to improve their approach to modern slavery. The engagement will include category training, 1-2-1 conversations, and engagement with the commercial leads.
79. In late 2023, the City Corporation's Commercial Service underwent an audit against the ISO 20400 standard for Sustainable Procurement. This audit reviewed our procurement policy, toolkits, templates, and the application of these resources by buyers and stakeholders. The City Corporation scored 2.73, which is above average for a first-time assessment. The standard emphasizes managing risks, addressing adverse sustainability impacts through due diligence, and promoting decent work and ethical behaviour as part of sustainable procurement.
80. Additionally, the City Corporation was a founding partner for [Action Sustainability's Practical Procurement Guidance](#) aimed at combating modern slavery in solar PV supply chains. While this guidance focuses on solar panels, it is also applicable to other technologies with similar supply chain risks. We have shared this guidance through our category boards and climate action strategy team.

## Policies and Commitments

81. The City Corporation has a suite of policies, toolkits and reporting commitments to promote responsible business and ensure we minimise risks of modern slavery taking place within our domestic and global supply chains.
  - **City Corporation Responsible Procurement Policy:** Our [Responsible Procurement Policy](#) aims to deliver optimal value while enhancing the lives of those within our supply chain. It is 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.

Applicable to all contracts awarded by the City Corporation, it requires action from officers with purchasing responsibilities and suppliers providing goods, services or works contracts. The City Corporation has six Responsible Procurement commitments, which includes a specific commitment to “*protect human rights in our supply chain by working with suppliers who undertake due diligence to guard against modern slavery and other human rights abuses.*”

- **Human Rights Toolkit:** Mitigating modern slavery and ensuring human rights in our supply chain are integral to our six responsible procurement commitments. Each commitment is supported by a dedicated toolkit that helps officers understand the risks, statutory duties, and considerations at each stage of the commercial lifecycle, including escalation procedures. The Human Rights toolkit provides links to valuable external resources, such as the Supply Chain Sustainability School and Government Commercial Colleges e-learning suite.
- **Oversight and Reporting:** We publish an annual report to assess the impact of our supply chain against our six responsible procurement commitments. The Responsible [Procurement Impact Report for the financial year 2023-24](#) is available on our website. Additionally, we will publish all six responsible procurement toolkits alongside our Responsible Procurement Policy on our website. These toolkits explain the importance of each commitment, outline steps for advancement, and set expectations for suppliers. Our aim in publishing these resources is to enhance supplier awareness, improve bid quality, and foster more meaningful discussions with our current suppliers.
- **Climate Action Strategy:** [Our 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.
- **Procurement Code:** Rules 45 (Responsible Procurement) and 50 (Modern Slavery and Human Rights) of our [Procurement Code](#) require officers to minimize ethical sourcing risks and uphold human rights within our supply chain.
- **Contract Terms:** Our standard terms and conditions mandate contractor compliance with the Modern Slavery Act 2015 and reserve the right to terminate contracts for non-compliance.
- **Fairtrade Commitment:** We adhere to [a Fairtrade Resolution](#), using Fairtrade products exclusively in the Guildhall Club and for City Corporation Hospitality Events, including 100% of products such as tea, coffee, sugar, bananas, and chocolate.
- **UN Global Compact:** As a signatory to the [UN Global Compact](#), we integrate considerations for workers, communities, and the environment into our business decisions. Our commitments include Goal 8 (Decent Work and Economic Growth), ensuring International Labour Organisation standards are met, and Goal 12 (Responsible Consumption and Production), focusing on reducing waste and promoting reuse to mitigate modern slavery risks in mining and materials critical to climate action.

This statement was approved by the City Corporation's Court of Common Council on **Thursday  
5 December 2024**