



Cabinet Office

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Modern Slavery Statement 2021

Ministerial Foreword from Lord Agnew (Minister for Efficiency & Transformation)



Modern slavery is a serious human rights issue with innocent people being treated as commodities and exploited for criminal gain, including here in the UK. It is essential that British taxpayer's money is not spent with those who exploit vulnerable people and public procurement has an important role to play in preventing Modern Slavery and Human Rights abuses.

We will take action to identify, mitigate and manage the risks in the contracts which are held across the Cabinet Office and its agencies. We will also take a wider role in working with both the Crown Commercial Service and other Government Departments to ensure that we are working with our strategic suppliers to eliminate modern slavery in our supply chains. As part of this work we have set out guidance notes on Tackling Modern Slavery in Government Supply Chains ([Procurement Policy Note 05/19](#)) and on Taking Account of Social Value in the Award of Central Government Contracts ([Procurement Policy Note 06/20](#)).

This, our first modern slavery statement, sets out the actions we have already taken to identify, prevent and address modern slavery in our supply chains. It also sets out our goals, future plans and our unwavering commitment to tackling this heinous crime.

Section 1: Organisation structure and supply chains

Background on department's function

The **Cabinet Office** supports the Prime Minister and ensures the effective running of government. It is supported by [25 agencies and public bodies](#). The Cabinet Office has expanded from undertaking traditional secretariat work to a much wider role at the centre, coordinating delivery and driving change across government. The ultimate goal is world-class public services, delivered with maximum value for the taxpayer. This is achieved through the following strategic objectives:

- (1) Deliver the priorities of the Prime Minister and government
- (2) Seize the opportunities of EU Exit
- (3) Secure a safe, prosperous and resilient United Kingdom
- (4) Improve levels of equality across the UK
- (5) Increase the efficiency, effectiveness and accountability of government through modernising and reforming the work of the Government Functions

The Crown Commercial Service (“CCS”) has published its own statement which is available on [GOV.UK](#). All other Cabinet Office Arms Length Bodies have signed up to and are included in this statement.

Sourcing Arrangements

Cabinet Office's procurement functions were outsourced to **CCS** in 2013. Since then, CCS (which is an executive agency and trading fund of the Cabinet Office) has managed the procurement activity of both departments in line with its standard processes and procedures. CCS is the procurement arm for the significant majority of goods and services which are sourced by the department.

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CCS manages over 100 commercial agreements for the purchase of common goods and services, organised into four category groups, called “pillars”. The four pillars in CCS are Buildings, Corporate, People and Technology. There were approximately 10,000 suppliers registered on these commercial agreements in the reporting period, the significant majority of which are UK registered. Spend through CCS agreements was £22.71b for the reporting period.



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Cabinet Office and CCS work together to assure both customers and the public that spend on goods and services is not funding abuses of human rights. This is particularly important in view of the volume and value of procurements that CCS are involved in running across Whitehall and the wider public sector.

Reporting period

This statement sets out the steps that Cabinet Office have taken during the year 1 April 2020 to 31 March 2021 to prevent modern slavery and human trafficking in its business and supply chains.

Organisation facts and figures:

Workforce management information for the **Cabinet Office** for the period 2020 to 2021 is available [here](#).

Cabinet Office staff (including the United Kingdom Security Vetting (“UKSV”) team) are based in our ministerial offices in London and the following locations around the United Kingdom:

- England: North East (Newcastle), North West (Liverpool, Manchester, Cheadle Hulme), Yorkshire & the Humber, Leeds, York and Sheffield (Northallerton), West Midlands (Birmingham), East Midlands (Nottingham), East (Cambridge and Norwich, Huntingdon), South East (Basingstoke, Milton Keynes, Gosport, Portsmouth, Aldermaston, Salisbury), South West: Bristol, Blandford, Plymouth, Gloucester, Hereford, Shrivenham and London
- Northern Ireland (Belfast)
- Scotland (Edinburgh; Helensburgh¹)
- Wales (Cardiff and Barry)
- We also have a small UKSV occupancy overseas in Cyprus

Supply chain facts and figures

Cabinet Office spend with third party suppliers via contracts for 2020/21 financial year was £1.1b. This included 18 contracts which were classified as “Gold”² following a tiering exercise.

The contracts are risk assessed using a tiering tool which looks at several factors: value, complexity of the service provision, market stability and maturity, impact of supplier failure and information security risk. This risk assessment determines a level or tier of risk (gold, silver, or bronze – bronze being lower risk), which in turn prescribes specific processes to be applied during the contract management phase commensurate to the level of risk.

The top three categories of spend across the departments is for services relating to Communications & Professional Services, Buildings & Facilities and ICT. The spend

¹ During the reporting period it was also announced that the Cabinet Office would establish a second flagship HQ with ministerial offices in Glasgow.

² A Gold Contract is defined as a strategically important contract within the department.



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for all of these areas goes through CCS frameworks, where safeguards are in place to protect against Modern Slavery. While CCS undertakes due diligence with regards to slavery risk at framework level Cabinet Office take forward additional due diligence where required as part of their contract management responsibilities.

Anti-Slavery Advocate

Governance of modern slavery risk is sponsored and overseen by our Anti-Slavery Advocate, Tim Rogers (Commercial Director). Key components of the governance process include championing, promoting and developing our policies and programmes to address modern slavery in our procurements and contracts.

Section 2: Policies in relation to modern slavery

Modern Slavery

The Modern Slavery Act 2015 is actively embraced by Cabinet Office with tenders and contracts including strong obligations regarding compliance with modern slavery legislation. Cabinet Office also actively deploys the provisions under section 54 (Transparency in Supply Chains etc) of the Act to require large businesses to report on the steps they have taken to tackle modern slavery in their operations and global supply chains.

HR Policy

Due to our comprehensive policies and processes for employing staff across Cabinet Office, we consider the risk of slavery, including forced labour, to be very low in our directly employed workforce. The policies are based on the following principles:

- All terms and conditions of service for government departments and agencies are set out in the Civil Service Management Code.
- Providing safe / hygienic working conditions – we are committed to providing a safe working environment for all our staff. We have a range of policies and procedures in place covering building safety, staff safety and contractors. We have specific reporting tools in place to enable people to report an accident or incident should the need arise, and we adhere to current health and safety legislation.
- Child labour shall not be used – Cabinet Office do not employ anyone under the age of 16, although occasional placements (usually lasting 2 weeks) for school pupils may be accepted.
- Living wages are paid – our lowest paid salary range is over the living wage.
- The Cabinet Office have a “Raising a Concern” policy which allows employees, contractors, consultants and agency workers to raise concerns they may have about wrongdoing, an example of which could be Modern Slavery. The “Dispute Resolution Policy” also provides a similar vehicle for staff to formally voice any concerns which they would like to put forward - including complaints relating to bullying, harassment or discrimination and/or terms and conditions such as pay or allowances, holiday pay and entitlement to carry forward leave, or equal pay.

Social Value

Cabinet Office ensures that wider Government policies are actively being implemented into their business and commercial processes. This includes [Procurement Policy Note 06/20](#) which relates to Social Value. The Commercial Team actively works with CCS and business units within the department to apply social value requirements to frameworks, calls offs and direct awards as well as reinforcing strong messages around how we can achieve added social value beyond that which



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we are buying. This includes consideration on how social value requirements in contracts can support the fight against Modern Slavery.



Section 3: Risk assessment and due diligence

Cabinet Office rely on CCS to risk assess suppliers on their frameworks. This is supplemented by further due diligence undertaken by Contract Managers within the departments. Modern slavery is and will continue to be a standard agenda item at the monthly catch ups between Cabinet Office and CCS. This covers:

- Looking at any risks to the Cabinet Office which are posed following updated returns or new ones submitted by suppliers via the [Modern Slavery Assessment Tool \(“MSAT”\)](#) who did not fully complete an assessment to submit one. Priority will be given to contact low scoring suppliers. We will also be paying particular attention to suppliers with overseas supply chains.
- Looking at using MSAT to assess the suppliers which Cabinet Office awards contracts to outside of CCS frameworks.
- Actively supporting any wider work which CCS take forward around implementing Modern Slavery policies and specifically making risk assessments and due diligence on suppliers part of the business as usual process. Most notably here the practical application of ([Procurement Policy Note \(PPN\) 05/19](#))
- Supporting any wider work which CCS takes forwards around implementing Modern Slavery policies and specifically making risk assessments and due diligence on suppliers part of the business as usual processes.

CCS has taken forward a number of actions as part of its active pursuance of Modern Slavery policies since 19/20. This has included:

- Risk assessing its entire portfolio of commercial agreements to determine whether they were at high, medium or low risk of modern slavery occurring. This was a significant exercise which identified 26 framework agreements with potentially high risk supply chains.
- Overseeing over 200 suppliers on these frameworks completing the MSAT which ensured that there was a rich level of data to look through to draw future recommendations from. Follow-up conversations with suppliers who completed the first campaign started early in 2020. However, this was one of many areas of our work disrupted by the COVID-19 pandemic. In future years, CCS will use supplier performance review meetings to focus on improvements that need to be implemented to tackle any identified modern slavery risks.
- Taking steps to make completion of the MSAT questionnaire a contractual requirement post-contract award in many new commercial agreements. It is also taking steps to ensure that suppliers who fall in scope of the Modern Slavery Act are publishing an annual modern slavery statements on their web sites.
- Including a requirement under schedule 5 of the Public Sector Contract to include anti-slavery and human trafficking provisions in all its contracts. This most notably includes the need for suppliers to prepare an annual statement



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which sets out the steps they have taken to address and tackle modern slavery in any part of its business or supply chains.

Role of Cabinet Office

The Cabinet Office delivers its Modern Slavery policies through a number of interventions which are made throughout the procurement cycle. These are drawn from the following checklist:

Pre-Procurement / Specification
Has the risk of modern slavery been established? At what level - low, medium or high?
Has early market engagement identified SMEs/VCSEs in supply chains? If not, what actions can you take to generate interest from SMEs/VCSEs in bidding?
Can modern slavery risks be managed / mitigated within the service or activity?
Are the modern slavery risks clear to the market / potential bidders? Are they in agreement with your assessment of the risks?
Are the monitoring arrangements clearly set out? Have you tested for burdens on SMES/VCSEs? Does the market agree these are proportionate to the risks?
Can the Standard Selection Questionnaire (part 3) be supplemented with additional questions for medium / high risk contracts? Can SMEs/VCSEs meet these asks without creating burdens or barriers to their participation?
Do the award criteria take account of the risk of modern slavery? How?
What evidence will suppliers be asked to provide? Is the evidence required proportionate to the risk? Have you tested this with SMEs/VCSEs? How will the credibility of this evidence be assessed?
Have the terms and conditions of the contract been set out? Do they meet your needs to address risks of modern slavery? E.g. where relevant you should set out your rights to carry out site visits and/ or receive management information. Do the terms and conditions pass unnecessary risks to suppliers? Are the terms and conditions suitable for SMES/VCSEs?
Selection Stage
How will you verify that the mandatory exclusion grounds relating to modern slavery offences do not apply?
Award Stage
What evidence will bidders provide to demonstrate they have addressed any specification requirements in relation to managing modern slavery risks? Is the evidence proportionate to the risk?
What evidence will bidders provide to demonstrate, if subcontractors are used, that the supply chain will be managed and monitored to mitigate any modern slavery supply chain risks? Is the evidence proportionate to the risk?



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Are workforce conditions, working and employment practices and a bidder's recruitment practices relevant to the subject matter of the contract? Have any minimum requirements or award criteria been clearly set out to bidders, using Annex C example questions and criteria, where relevant? Have you tested this with the market to ensure it is not burdensome to provide or likely to deter SMEs/VCSEs from bidding?

Contract Management

Are there proposed KPIs in place to monitor progress against managing modern slavery risks? Are these proportionate?

Have you set out how communication and reporting lines will be established with the supplier?

Had the requirement to regularly report on modern slavery risks been set-out? How will supplier performance be managed in this regard? Are these proportionate to the risk?

Are site visits / audits necessary to monitor modern slavery risks? If so, who is responsible?

Have you established a clear and unambiguous process for reporting and responding to suspected incidents of modern slavery?

Do you have a contingency plan in place to ensure continued safe service delivery if modern slavery risks are identified or cases of modern slavery have been reported?

The principles are applied to procurement activities which Cabinet Office take forward through the use of CCS as well as any requirements which are taken forward directly by the Departments. Where CCS take forward the procurement the checklist is used as one of the tools by which performance is quality assured and measured.

Approach adopted by CCS

As part of its approach to risk, CCS uses the updated [standard selection questionnaire](#) for managing all of the Cabinet Office procurements that it takes forward. This enables an assessment of prospective bidders' credentials and the ability to determine whether they have breached their obligations in the field of social and labour law and other collective agreements and standards.

As part of this approach all bidders are required to confirm whether their organisation (or anybody working in it with decision making powers or control) has been convicted of child labour or human trafficking offences or any other modern slavery crimes, as part of the selection process. Bidders who have been convicted of certain modern slavery offences under the Modern Slavery Act 2015 within the last 5 years risk being excluded from public procurements, unless they can demonstrate that they have taken measures to remedy these failures and prevent their recurrence.

Bidders are also asked to confirm whether they are in scope of Section 54 of [the Modern Slavery Act 2015](#). Section 54 of the Act requires, amongst other things, certain commercial organisations who have a turnover of over £36 million to publish an annual modern slavery statement on their website, and any bidder who is in scope is required to provide CCS with a link to their statement.



CCS is able to disqualify any bidder from a place on its frameworks for modern slavery convictions and suppliers can be suspended or removed for performance failures and failure to respond to reasonable requests for information.

Strategic Suppliers across Government

The Markets and Suppliers team within the Government Commercial Function (“GCF”) have worked closely with the Government’s top Strategic Suppliers to pilot the Modern Slavery Assessment Tool (“MSAT”) over the last year. This was prior to the wider rollout of the tool in the Home Office. As part of this work, all Strategic Suppliers have been invited to complete the MSAT annually. Specific improvements in performance by suppliers are looked at in the Strategic Supplier Annual Reviews undertaken by the Markets and Suppliers Team.

In addition to completing the MSAT at least once a year, Strategic Suppliers are encouraged to review their responses on the MSAT portal throughout the year when changes are made within their organisation and consider the latest tailor-made recommendations. GCF has provided support to suppliers to share their MSAT results with other Government Departments via the MSAT portal.

All Strategic Suppliers completed the MSAT in 2020/21. This was the second year of 100% completion, including any new suppliers that joined the programme that year. All suppliers with a score below 70% on the MSAT (non-green rating) were required to undertake a review meeting with Crown Representatives, commercial specialists and representatives from the Modern Slavery Unit at the Home Office, and then revisited their assessment. Engagement also took place with the suppliers with green scores to ensure that their performance was being maintained. The MSAT ratings are provided below for reference:

Performance score	Rating
0-19%	Red
20-39%	Orange
40-69%	Yellow
70-100%	Green

GCF analysed Strategic Suppliers’ MSAT results. The average Strategic Supplier MSAT score in 2020/21 was 80%. Showing an increase from 70% in the previous year.

There have been significant changes in behaviours and attitudes amongst suppliers. The GCF has helped Strategic Suppliers identify common weak areas on the MSAT and worked with the Home Office to suggest ways suppliers could improve their practices throughout the supply chain, not just at tier one.



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GCF hosted the first modern slavery roundtable event with the Independent Anti Slavery Commissioner in February 2019. In May 2021, the Cabinet Office and the Home Office co-hosted a further modern slavery roundtable event to support Strategic Suppliers. Best practice and lessons learnt were shared at these round table events to help suppliers improve.

GCF is now focusing on delivering sector specific modern slavery round tables for three Government priority areas: technology, construction and facilities management. These events are organised in collaboration with trade bodies and relevant departments.

GCF has also encouraged Strategic Suppliers to mark Anti-Slavery day on 18 October to raise awareness of human trafficking and modern slavery.

Section 4: Training and Awareness Raising

CCS have run awareness raising sessions, introductory sessions and specific skills sessions across the executive agency during the year April 2020 to March 2021. These sessions as well as wider briefing sessions for CCS staff carry the support of the Cabinet Office.

We will look to build upon these sessions and use them for both commercial and other staff working in the Cabinet Office during the next twelve months - this will range from general awareness sessions to advice / guidance on how to apply / implement Modern Slavery policies in practice. This includes, where necessary, providing training on how to use the MSAT Tool.

As part of Government's efforts to tackle modern slavery in global supply chains, the Home Office's Modern Slavery Unit and Joint Security and Resilience Centre have produced an e-learning for public sector commercial staff (at all grades) on the practical steps they can take throughout the commercial lifecycle to identify and mitigate modern slavery risks. It will be mandated that all Cabinet Office commercial staff complete this training. The e-learning course will give users a strong set of skills to:

- Recognise how modern slavery can manifest in supply chains.
- Spot modern slavery risks in procurement and critically interrogate the assurances suppliers provide (such as social audits).
- Drive improvements in modern slavery due diligence to create better outcomes for workers.

Procurement Policy Note (PPN) 05/19 has also been the subject of discussion at our joint Commercial Directorate all staff meeting to raise awareness of ongoing work across Government and in the departments to eradicate Modern Slavery from our supply chains.

Section 5: Goals and Key Performance Indicators (KPIs)

This section provides an overview of the Cabinet Office's (incorporating CCS) performance against the key goals which are set out in the Government's Modern Slavery Statement.

Anti-slavery advocates to be identified at director level to help oversee activity on Modern Slavery and increase awareness of action the department should take.	✓
Invite major suppliers in high risk areas to complete the Modern Slavery Assessment Tool	✓
Review, and where relevant amend, their procurement policies following publication of Procurement Policy Note 05/19.	✓
Begin or continue contract risk assessments to ensure their action plans are targeted.	✓
Develop KPIs to help us understand whether the action we are taking is working well and where we need to improve.	✓
Departments begin mapping tier 2 suppliers for high risk supply chains.	✓
Participate in training (to build capacity internally) and cross Government working groups to collaborate on common interests.	✓

We intend to build on this during the next twelve months by:

- Reviewing and risk assessing our most important existing contracts and undertaking random sampling of lower value requirements.
- Seeking to maximise completion rates for MSAT in future campaigns.
- Seeking to understand the reasons why some suppliers may have been reluctant to complete MSAT, better understand their concerns, and look at ways that we can encourage them to complete an assessment.
- Placing a stronger emphasis on effective contract performance review conversations with high and medium risk scoring suppliers.
- Focusing on improvements that suppliers can make to their ways of working and how this may improve their scores.
- Reviewing new commercial agreement business cases for modern slavery risk management, assurance and prevention proposals.



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- Supporting the development and publication of an improved version of Joint Schedule 5 (Corporate Social Responsibility) of the CCS Public Sector Contract. This will provide greater flexibility in modern slavery risk management by requiring suppliers, upon request, to provide current reports and assurances about their modern slavery due diligence.

Key performance indicators

Cabinet Office are taking action to identify, mitigate and manage modern slavery risks in their supply chains. The specific KPIs for which are outlined below. In addition to these Cabinet Office will support CCS in taking forward the KPIs which are included in its Modern Slavery Statement.

Key Performance Indicators 2021-22

Commercial Capability

KPI 1 – 100% of Commercial Directorate Staff will have undertaken the new Home Office Modern Slavery Unit's eLearning course by 31st March 2022. New joiners to the Commercial Directorate to undertake the course within one month of joining.

Risk Assessment & Management

KPI 2 - Modern Slavery risk assessments to take place on all new requirements over £1m.

Due Diligence

KPI 3 - By Spring 2022 MSAT will be completed for all new requirements over £1m which are assessed as medium - high risk of Modern Slavery.

Signed: Alex Chisholm , Permanent Secretary

Date: 21 October 2021

Signed: Lord Agnew, Minister of State for Efficiency and Transformation

Date: 25 October 2021

This statement was approved by the Executive Committee (the Cabinet Office's senior management team) on 15 October 2021.