

**Attorney General’s Office**

**and**

**Crown Prosecution Service**

**Anti-Modern Slavery Statement**

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# Foreword

Modern slavery is an abhorrent crime, where people are treated as commodities and exploited for criminal gain. It is estimated that across the globe there are in the region of 40 million people[[1]](#footnote-1) who are currently trapped in modern slavery, a harrowing figure.  
  
All organisations have a duty to do everything in their power to prevent the exploitation of people within their supply chain, and ensure that their procurement processes are transparent.   
  
Due in part to our roles within the criminal justice system, we know the importance of tackling these complex crimes at the highest levels, and fully stand behind the government’s requirement for all ministerial departments to issue statements on their supply chains.  
  
The Crown Prosecution Service (CPS) is in a unique position in prosecuting the perpetrators of modern slavery; working on cases which are often highly complex, transcend borders and hugely impact victims and their families. Modern slavery cases are handled by specialist prosecutors, who have the expertise and experience to deal with this challenging casework, collaborating with law enforcement partners to build strong cases which look to lessen the evidence requirements on victims. The Attorney General’s Office (AGO) advises and supports the Attorney General and Solicitor General, and amongst other functions provides legal advice to government, including on high-priority legal issues such as modern slavery.   
  
As the AGO procures goods and services through the CPS, we have taken the decision to issue a joint modern slavery statement, to reassert our organisations’ combined commitment to preventing modern slavery within our supply chains. Within this we aim to explain the actions that we have already implemented to prevent and mitigate modern slavery in our own supply chains and, looking ahead, set out our goals and plans to address this in the future.  
  
It will not be an easy road to eradicate modern slavery. However, by continuing our work at the heart of the criminal justice system to tackle these crimes and by looking closely at our own procurement processes, we are committed to being part of the answer.  
  
  
**Rt Hon Suella Braverman QC MP, Attorney General  
Rebecca Lawrence, Chief Executive Officer, Crown Prosecution Service**

International Labour Organisation figure: [Forced labour, modern slavery and human trafficking (Forced labour, modern slavery and human trafficking) (ilo.org)](https://www.ilo.org/global/topics/forced-labour/lang--en/index.htm)

# Executive summary

The UK government published its first [modern slavery statement](https://www.gov.uk/government/publications/uk-government-modern-slavery-statement) in March 2020. This committed all government departments to publish their own annual modern slavery statements. The AGO, along with the CPS – one of its arm’s lengths bodies – is committed to helping deliver the government’s objectives.

As government departments we have a responsibility to ensure taxpayers’ money does not inadvertently fund criminal activity and protect vulnerable workers in our supply chains from exploitation.

This statement will help the public to understand the steps we have taken to prevent modern slavery in our supply chains and ensure transparency in any areas where we feel our suppliers need to improve. We have set ourselves goals at the end of this statement and will report our progress against these in 2022.

Where the AGO receives procurement support and service provision, we are working with our sponsored departments to gain the support of our strategic suppliers, building on existing relationships to tackle modern slavery by improving transparency in our supply chain.

AGO is an integral part of both the cross-government Anti-Slavery Advocate network and together with CPS, is a member of the cross government Modern Slavery Procurement Implementation Group – sharing best practice and learning, such as our modern slavery podcasts across Government.

The CPS works collaboratively with partners across the criminal justice system to support the delivery of government priorities and ensure that Ministers and the Independent Anti-Slavery Commissioner (IASC) has a contextualised and accurate picture of emerging trends and challenges to bringing prosecutions.

# Section 1: Organisation structure and supply chains

This section outlines the organisational structure of the two departments involved in producing this statement: the AGO and the CPS. We provide an overview of our supply chains and governance arrangements to tackle modern slavery in our supply chains.

The AGO is a small ministerial department without designated procurement staff, so utilises the CPS procurement team for the majority of our procurement functions. The CPS is a non-ministerial department with a budget of greater than £36m, and therefore is required to produce a Modern Slavery Statement. As such, the AGO and CPS have elected to produce a joint statement.

**About the Attorney General’s Office and the Crown Prosecution Service**

The [Attorney General's Office](https://www.gov.uk/government/organisations/attorney-generals-office) is a ministerial department which supports the Attorney General and the Solicitor General (the Law Officers). The Law Officers are responsible for providing legal advice to the government. The AGO also helps the Law Officers perform other duties in the public interest, such as looking at sentences which may be too low.

The Attorney General also superintends the main independent prosecuting departments – the [Crown Prosecution Service](https://www.cps.gov.uk/) and the [Serious Fraud Office](https://www.sfo.gov.uk/); as well as, [Her Majesty’s CPS Inspectorate](https://www.justiceinspectorates.gov.uk/hmcpsi/), which inspects how cases are prosecuted, and; the [Government Legal Department](https://www.gov.uk/government/organisations/government-legal-department) (GLD), which provides legal services to government.

The CPS is a non-ministerial department that is responsible for prosecuting criminal cases that have been investigated by the police and other investigative organisations in England and Wales. The CPS’s duty is to make sure that the right person is prosecuted for the right offence, and to bring offenders to justice wherever possible.

## **Organisation Facts and Figures 2020/21**

The AGO employs approximately 50 members of staff. Around a quarter of these are lawyers, with the rest fulfilling office support functions, policy roles and private office functions. All AGO staff are based in its London office. The AGO’s annual budget, including all procurement and staffing costs is approximately £5 million.

The CPS has an annual budget of approximately £676 million and employs over 6,000 employees. Almost half its employees are lawyers, who are responsible for deciding whether to prosecute cases, and represent the Crown in the courts. The remaining employees work to assist prosecutors preparing cases for court, or in other professions including operational delivery, commercial, security, finance, human resources, communications, and digital and technology services.

The CPS operates across England and Wales with 14 regional teams prosecuting cases locally, supported by numerous HQ locations across England.

A small number of CPS employees work in its International Justice and Organised Crime division, responding to requests for support by other judicial authorities. Support may include secondments to support local justice policy and advice. CPS works closely with the Foreign Commonwealth and Development Office in its work overseas, including commercial accessing their supply chains for overseas support.

## **Prosecution facts and figures**

As the main prosecuting body for England and Wales, the CPS is responsible for prosecuting people who break the Modern Slavery Act (2015). In 2020 a total of 259 defendants were charged with modern slavery crimes, an increase from 239 in 2019. With fewer cases being heard in court during 2020, the number of convictions decreased from 251 in 2019 to 197 in 2020. However, the conviction rate rose from 71.9% in 2019, to 73.8% in 2020.

## **Commercial facts and figures**

AGO annual contractual spend outside of what is procured by the CPS is £115,000. Internal assessments of these contracts were made and, due to the low value and low risk nature of these contracts, they are not included in the more stringent risk assessment practices completed in Section Three. These contracts are procured by other government departments as part of a wider procurement exercise by the Cabinet Office and Department of Transport.

The CPS has an annual spend of approximately £52 million, with third party suppliers of goods and services. The AGO have access to IT services equating to approximately 0.01% of that total. This excludes spend on external advocates.

This spend falls into four categories, listed below alongside approximate annual spend for 2021-22:

* **Business solutions** (for example travel, occupational health) – £3 million;
* **Professional services** (including contractors, consultancy and learning and development) – £3 million;
* **Legal court services** (for example video transcription services and video links to court) – £6 million;
* **Information technology** (including digital transformation, hosting (including data storage), software, hardware and licensing) – £40 million.

The category at highest risk of modern slavery practices within the supply chain for both departments is IT, specifically the manufacture of equipment overseas. As small departments, the majority of spend is via Crown Commercial Service frameworks. The exception to this is the court services, which are tendered directly by CPS as it is a niche area unable to be supplied by existing framework provision. The suppliers in this category are specialist small and mid-size enterprises (SMEs).

## CPS commercial team

The commercial function of the CPS has 27 employees, which is set to increase to 48 by the end of the financial year. The commercial team has a dedicated contract management team responsible for leading modern slavery supply chain work, and a new Head of Policy role to ensure that all legislative and ethical practices are embedded in CPS commercial policy, governance and working practices.

**CPS contract categorisation**

Currently the CPS has a total of 163 contracts in place, across 125 different suppliers. The CPS operate a three-tier categorisation model aligned with the Cabinet Office best practice guidance for contractual tiering to ensure it concentrates a proportionate amount of effort on its most strategic contracts where the most value can be added:

**GOLD – 44 Contracts, ~ £32m**

* Business critical
* High value
* High reputational risk
* High complexity
* Appointed Lead Contract Manger or Contract Manager within the Commercial team

**SILVER – 58 Contracts, ~£16m**

* Medium value
* Medium reputational risk
* Could be managed as part of a portfolio by a Contract Manger within the Commercial team

**BRONZE – 61 Contracts, ~£3m**

* Low value
* Low reputational risk
  + - Commercial support predominantly procurement, light touch in-contract

The Category Management Team manage all procurements and contract manage all silver and bronze suppliers. The Contract Management Team manage all gold contracts including Strategic Supplier Relationship Management for the most critical suppliers. The CPS has five strategic providers, of which two are also strategic suppliers to government[[2]](#footnote-2).

2 [Crown Representatives and Strategic Suppliers - GOV.UK (www.gov.uk)](https://www.gov.uk/government/publications/strategic-suppliers/crown-representatives-and-strategic-suppliers)

## **Internal governance**

Douglas Wilson is the Director General of the AGO and has responsibility for the regularity and propriety of the AGO’s spending decisions, including the steps taken to prevent modern slavery in AGO supply chains.

He is supported by the Executive Board including Kelby Harmes, the AGO’s Modern Slavery Advocate, and further supported by the Head of Corporate Services in the AGO.

Within the CPS the modern slavery supply chain governance sits within the Digital, Commercial and Information Directorate (DCID), with Mark Gray, the Chief Digital Information Officer, responsible for reporting adherence at the CPS Executive Group. The Head of Commercial is responsible for the overall commercial policy setting within the CPS, including the actions taken to prevent modern slavery practices in our supply chains, supported by the Head of Contract Management who is responsible for the implementation of commercial policies.

# Section 2: Policies in relation to modern slavery

## **Promotion, implementation and enforcement of** [**Procurement Policy Note 05/19**](https://www.gov.uk/government/publications/procurement-policy-note-0519-tackling-modern-slavery-in-government-supply-chains?utm_source=24547101-5fd5-4d67-9943-3b62730698a5&utm_medium=email&utm_campaign=govuk-notifications&utm_content=immediate)

Relevant cross-government policies are listed in the [UK government modern slavery statement](https://www.gov.uk/government/publications/uk-government-modern-slavery-statement). As the CPS is a small department, it procures all goods and services via public sector frameworks, with the exception of niche services in support of prosecuting cases in court.

As part of the transformation and expansion of the CPS Commercial function, there has been a new function created to specifically develop and monitor commercial policy and governance. This includes a full development programme to ensure the CPShas a fit-for-purpose policy and governance framework, supplemented by a suite of commercial templates and manuals to drive consistency in delivering regulatory and policy requirements. As an important stakeholder for the CPS, the AGO’s needs have been factored into this work.

## **Implementation of anti-modern slavery and social value in procurement policy**

The CPS has embedded social value and anti-modern slavery requirements within its commercial policy and has developed the suite of standard tender templates to ensure these are considered in appropriate procurements.

To date, the CPS has incorporated the minimum requirements across all of its procurement processes, and it is an integral part of its improvement strategy to focus on these key areas of work as part of its policy development programme.

## **Implementation of responsible purchasing practices**

The UK’s [Annual Report on Modern Slavery](https://www.gov.uk/government/collections/modern-slavery#research-and-publications) outlines the government’s work to tackle modern slavery, including how the government supports victims, advocates internationally, and is involved in law enforcement.

As part of the CPS Commercial restructure, a strategic sourcing and commercial finance team has been created. The team work to ensure that for relevant contracts appropriate risk assessments are made, so bids are sustainable and do not encourage unethical practices in the supply chain. This includes strict procedures for prompt payment of all contracts (in 2020-21 the CPS settled 93.8% of undisputed invoices within 10 days of receipt).

CPS commercial strategic sourcing and category teams work together to ensure that modern slavery assessments are embedded in all applicable procurements, with the policy team ensuring that this is monitored for audit and reporting purposes. The Heads of Strategic Sourcing and Category will review the modern slavery and social value requirements embedded in the CPS’s procurement processes to ensure continual improvement and evolve these assessments to deliver the outcomes for the CPS and AGO, whilst ensuring a healthy, ethical supply chain is in operation.

The Contract Management Framework and supporting toolkit includes a full monitoring process for the ongoing identification of modern slavery within existing contracts. All gold-tier contracts will be subject to full annual risk assessment review, with robust follow-up action planning.

The CPS ensures there are mandatory routes for complaints to be reported to relevant persons as part of its monthly contract performance monitoring for all gold contracts. Any reports of breaches are treated with the highest importance and rectification plans put in place with suppliers.

# Section 3: Risk assessment and due diligence

## **Approach to prioritising anti-slavery activity**

Modern slavery can affect virtually any industry and any country. To have the greatest impact on the lives of vulnerable workers, the AGO and CPS take targeted action where the risks of exploitation are the most severe, salient and strategic – in line with the [UN Guiding Principles on Business and Human Rights](https://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf).

We will also work in collaboration with our criminal justice system partners to ensure a co-ordinated approach to shared supply chain interactions is undertaken, removing burden from suppliers and internal teams where we make one interaction count multiple times.

We elected to take a strategic approach, focusing on five key areas: **contract categorisation**, **raising awareness, supply chain mapping, risk mitigation** and **procurement and contract management process.**

**Contract categorisation:** We have assessed our procurement footprint based on a high, medium or low risk of modern slavery. This assessment takes into account industry type, complexity of supply chain, nature of workforce, context in which the supplier operates, type of commodity and supplier location:

**Industry** – High risk are often those that involve raw materials and are labour intensive, such as manufacturing, electronics, hospitality, warehouse etc.

**Commodity** –Some imported goods are categorised by the Global Slavery Index as higher risk of forced compulsory labour, such as garments, electronics, fish, cocoa, rice.

**Location/context** –Some countries are higher risk due to their lack of laws and presence of high numbers of vulnerable workers (e.g. children, migrants, minority groups with a history of persecution).

**Business model** –Sub-contracted supply chains are at greater risk as the complexity often makes it difficult to identify workers

A total of 19 contracts were identified as high risk in one or more of these categories.

**Raising awareness:** CPS and AGO have provided briefing packs for our executive teams and have their support in deploying training throughout the organisation. Awareness training will be completed across both AGO and CPS, with more detailed training for commercial colleagues and operational contract managers dealing with our suppliers on a day-to-day basis. The CPS have also provided a presentation to its expert modern slavery prosecution colleagues to enable greater opportunities to reveal hidden risks.

**Supply chain mapping:** Following the modern slavery risk categorisation, we have mobilised the risk assessment of all high- and medium-risk contracts, this resulted in 27 suppliers mapping their supply chains by utilising the Modern Slavery Assessment Tool (MSAT).

MSAT is a free modern slavery risk identification and management tool developed by the Home Office for public bodies to use with their suppliers.

The tool gives suppliers tailored good practice recommendations to improve their anti-slavery activity, from how they conduct risk assessments to ensuring their due diligence helps prevent debt bondage.

**Risk mitigation:** The intention of the MSAT is to identify specific contract-related risks and work with our suppliers to ensure all risks are eliminated or mitigated. The six themes assessed by the MSAT are Governance, Policies and Procedures, Risk Assessment, Due Diligence, Training and Key Performance Indicators (KPIs). We are building the capability of our contract managers to discuss the specific, bespoke findings with our suppliers and implement monitoring processes to ensure our suppliers are acting on the recommendations provided by the MSAT reports.

**Procurement and contract management processes:** To ensure the continued review of our supply chain, we will implement at least an annual review process for our most high-risk contracts. New robust pre-procurement processes shall also be implemented to ensure any future suppliers are working to mitigate the risks of modern slavery practices in their supply chains before embarking upon any contract work with us.

## **Findings from risk assessment**

In total, 27 suppliers have completed the MSAT. These comprised all 19 identified high-risk contracts and the remaining eight were medium-risk contracts.

**The initial assessment found no immediate breaches (or risk of breach)** of the [Modern Slavery Act](https://www.legislation.gov.uk/ukpga/2015/30/contents/enacted). All suppliers who are required to produce a Modern Slavery Statement – those with a turnover greater than £36m – have done so, and a number of smaller suppliers not required by law have also published statements.

|  |  |  |
| --- | --- | --- |
| **GOVERNANCE** | **WHY THEME IS IMPORTANT**  Modern slavery is everyone’s responsibility. Effective governance ensures that the issue is visible to the organisation’s senior leadership and they have given their support and commitment to tackling it. Producing an annual modern slavery statement is a legal requirement for commercial organisations with a turnover of £36m or more. | **FINDINGS**  Governance was the highest scoring theme among CPS suppliers.  All suppliers with a turnover of £36m or more have produced modern slavery statements and published these online.  Several of smaller suppliers have produced statements, even though they are not required to do so by law. |
| **POLICY AND PROCEDURES** | **WHY THEME IS IMPORTANT**  Clear policies and procedures are the way in which an organisation’s commitment to tackling modern slavery is translated into its business practices. They help communicate to employees and suppliers how to identify risk, what actions to take and how and when to raise concerns. | **FINDINGS**  24 out of 27 suppliers have further policies relevant to the prevention of modern slavery including all 19 of the high risk contract suppliers. These include some detailed, exemplar policies that could be shared as best practice.  CPS will work with the exemplar suppliers to support development across our supply chain, particularly SMEs. |
| **RISK ASSESMENT** | **WHY THEME IS IMPORTANT**  Assessing the risk is key to an organisation understanding how and where modern slavery might specifically present in its organisation and supply chain. It is the first step in knowing where to focus, how to target resources and what control environment is needed to prevent, mitigate and manage risks. | **FINDINGS**  63% of suppliers have assessed how their purchasing practices could increase the risk of modern slavery.  100% of suppliers considered risks within the commercial cycle. 52% of suppliers considered risks at multiple stages of the commercial cycle, from identification of needs through to contract management.  The remaining 48% of suppliers considered risks at major stage-gates such as tender evaluation or contract award.  CPS will work with its supply chain to encourage suppliers to consider risks earlier, at point of identifying needs and specifying requirements. |
| **DUE DILIGENCE** | **WHY THEME IS IMPORTANT**  Conducting due diligence is vital to ensure that appropriate action is taken as a result of risk assessments. This will often require further and more detailed audit and investigation into certain areas. This is particularly important because of the secretive nature of modern slavery. | **FINDINGS**  26 of 27 suppliers ensure employees have access to grievance and/or whistleblowing policies to report suspected incidences of modern slavery.  Only 33% of suppliers work with NGOs and these are exclusively large suppliers. Smaller suppliers would benefit most from the support NGOs could offer.  CPS will work with its large suppliers to identify ways smaller suppliers could benefit from NGO support. |
| **TRAINING** | **WHY THEME IS IMPORTANT**  Training is an important way of ensuring that an organisations commitment to modern slavery is communicated throughout its workforce and supply chain. Staff need to know what the organisation’s approach is, how to spot warning signs and how and when to raise concerns. | **FINDINGS**  81% of suppliers provide training to employees on modern slavery.  Only 11% of suppliers make training available to their suppliers.  29% of suppliers that do not currently provide training to their suppliers indicated that they would consider doing so.  CPS will work with large suppliers to broaden the reach of training and encourage suppliers in high risk categories to undertake training with their employees. |
| **KPIs** | **WHY THEME IS IMPORTANT**  What gets measured gets done. Organisations that set and monitor KPIs will be in a good position to make measurable improvements. They also demonstrate the organisations commitment to tackling modern slavery. | **FINDINGS**  KPIs was the lowest scoring theme among CPS suppliers, with an average score of 33%.  44% of suppliers have KPIs relating to modern slavery.  80% of suppliers that do not currently have KPIs said they intend to develop them.  CPS will develop KPIs in relation to Modern Slavery for appropriate future procurements and will work with suppliers to flow these down their supply chain. |

## **Engagement with external stakeholders**

The AGO and CPS are engaged across government via the Home Office Modern Slavery working group to share best practice and learn from our counterparts across government departments. We are particularly engaged with our justice partners.

The CPS will expand its training programme to ensure that it engages with external organisations who are experts in this field, to deliver valuable insights into the importance of this work. This in turn will help the CPS develop its future strategy.

We will work closely with our critical and key suppliers to provide cross-organisation training and case studies and use these to support development across our supplier portfolio to encourage best practice.

## **Participation in peer-learning groups or other collaborative initiates**

CPS Commercial presented the Modern Slavery Supply Chain Strategy to the CPS modern slavery prosecution leads meeting in June 2021. In return, the modern slavery prosecution lead will present on the cases that CPS prosecute to the Commercial Team and wider stakeholders as part of a wider programme of knowledge sharing.

The CPS is also working with the Ministry of Justice to share best practice and ensure the justice sector is working together to maximum effect.

# Section 4: Training and awareness raising



## **Training for staff**

Increasing the skills and capability of commercial staff and contract managers is fundamental to our ability to conduct effective modern slavery due diligence on our supply chains. Modern slavery commitments are being built into the CPS procurement and contract management frameworks. These will be reinforced by a training programme for the commercial team and operational contract managers (OCM) who work with our suppliers. This will become a part of the CPS induction process for new commercial employees and a mandatory training requirement for existing commercial and OCM team members.

Awareness-raising sessions will be available and delivered via team or directorate meetings and via lunch and learn sessions to ensure that wider CPS and AGO colleagues not directly involved in supplier management are also aware of the importance of this agenda. CPS Commercial have already presented plans at a national modern slavery leads meeting so that expert prosecutors around the country are aware of the internal work ongoing and are able to represent the CPS’ modern slavery work to regional stakeholders.

# Section 5: Goals and Key Performance Indicators

**Training goals and KPIs for 2021/22 financial year**

* 100% of commercial staff complete the new [modern slavery e-learning course](https://www.govcommercialcollege.co.uk/course/view.php?id=123).
* Commercial staff report an improved understanding of how to address modern slavery risks as a result of this e-learning course.
* 100% of commercial staff complete the Social Value e-learning course.
* Host and participate in awareness raising events aimed at senior public procurement leaders.
* Support engagement events with cross-government strategic suppliers.

## KPIs

The CPS has set an initial set of KPIs based on three key categories of work: MSAT completion; raising awareness (training and development); and procurement and tier 2 mapping. As a small department we are taking a phased approach to embedding Modern Slavery Supply Chain monitoring.

By the end of 2021/22 we will have:

* trained all commercial staff on the importance of modern slavery compliance;
* conducted awareness-raising sessions across the CPS and AGO;
* conducted MSATs with all high-risk suppliers;
* ensured that modern slavery assessments are carried out as part of all applicable procurements.

## Goals

The CPS’ long-term goals are aimed at adding value to the basic modern slavery mapping that will be undertaken to ensure compliance in its supply chain. The CPS will:

* align modern slavery prosecution and supply chain strategies to identify opportunities for joint working (for example, training opportunities);
* develop KPIs in relation to Modern Slavery for appropriate future procurements and will work with suppliers to flow these down their supply chain;
* work with its supply chain in high risk categories to encourage suppliers to consider risks earlier, at point of identifying needs and specifying requirements;
* CPS will work with its exemplar suppliers to support development across our supply chain, particularly SMEs, including development of case studies on how they are tackling modern slavery in their supply chains;
* work with the critical SME community to raise awareness of modern slavery and provide support to meet reporting commitments, engagement with NGOs and widening participation in training activities;
* develop cross-department and joint-supplier awareness-raising sessions to ensure a breadth of expertise is showcased;
* work with its justice partners to identify potential areas of collaboration;
* Align the social value commercial practices with the Modern Slavery CPS strategies to ensure that all angles of modern slavery are supported through our procurement practices.

1. [↑](#footnote-ref-1)
2. [↑](#footnote-ref-2)