



Department for
Digital, Culture,
Media & Sport

Modern Slavery Statement

November 2021

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Foreword

By the Secretary of State for Digital, Culture, Media and Sport



In 2020, the Prime Minister launched the Modern Slavery Statement, the first of its kind for any government. It committed ministerial departments to take action to identify and mitigate modern slavery risks throughout their commercial life cycle. I am extremely proud to present the first Modern Slavery Statement for the Department for Digital, Culture, Media & Sport (DCMS).

The DCMS remit is to drive growth and enrich lives. From regenerating communities through investment in place-based cultural initiatives, to making the UK the safest and fairest place to be online, our sectors are integral to widening opportunity and creating a fairer society for all. One of our core values as a department is that we are an inclusive, fair employer. We are committed to representing the diversity of modern Britain and providing equality for all in our workforce.

As we deliver on our strategic priorities, we must ensure that the benefits we deliver are not at the cost of unseen exploitation and abuse. We know that modern slavery is so pervasive that it is likely to exist in public sector supply chains around the globe. It is vital that we take every possible action to ensure that no public funds are involved, however indirectly, in modern slavery activities at any point in our supply chains.

This first departmental statement outlines the efforts we have been taking as a department to tackle the risks of modern slavery in our commercial activity, but we recognise that there is still much work to be done. We set out the steps we are taking, and more importantly, look to the future to consider how we, our arm's length bodies, and our sectors will support the UK government's world-leading work in tackling the scourge of modern slavery.

Rt Hon Nadine Dorries MP

Secretary of State for Digital, Culture, Media and Sport

Section 1: Organisation structure and supply chains

What is Modern Slavery?

Modern Slavery is a serious and often hidden crime in which people are exploited for criminal gain. The impact can be devastating for the victims. Modern slavery comprises slavery, servitude, forced and compulsory labour and human trafficking. The common factors are that a victim is, or is intended to be, used or exploited for someone else's (usually financial) gain, without respect for their human rights. The perpetrators seeking to take advantage of them could be private individuals, running small businesses or part of a wider organised crime network. For adult victims, there will be some element of coercion involved, such as threats, use of force, deception, or abuse of power.

The Home Office has identified four broad ways in which perpetrators may seek to exploit victims:

- Labour exploitation
- Domestic servitude
- Sexual exploitation
- Criminal exploitation

You can find out more about Modern Slavery and the different forms it can take via the Home Office [resource page](#).

About the department

The Department for Digital, Culture, Media & Sport helps to drive growth and enrich lives. Much of our work involves helping to strengthen communities and 'level up' people's ability to access opportunities provided by our sectors. As we emerge from the Coronavirus pandemic, we are at the forefront of efforts to enhance economic opportunity throughout the UK through investment in infrastructure and innovation. Our responsibility for driving growth must be conducted ethically and in a way that delivers benefits for all, without exploitation or risk of abuse. You can find out more about the department and its priorities in our [Outcome Delivery Plan](#).

As a smaller department occupying office space within the Government estate, including alongside Her Majesty's Revenue and Customs in 100 Parliament Street in London, the majority of DCMS contracts are for policy work and mostly involve UK-based professional services. We own very few operational contracts. In the 2019 to 2020 financial year, just under half of DCMS procurement spend (47.2%) was with Small and Medium Enterprises (SMEs), the highest figure across central government. Due to the nature of DCMS procurement requirements and our departmental supply chains, we do not operate many large-scale contracts with complex subcontracting, and most DCMS contracts do not operate in a high-risk context according to the Cabinet Office guidance '[Tackling Modern Slavery in Government Supply Chains](#)'. However, we are committed to ensuring robust anti-slavery practices in our procurement, as well as working with policy leads to explore wider modern slavery risks in our sectors.

DCMS works with [45 agencies and public bodies](#). All of these arm's length bodies (ALBs) are committed to tackling modern slavery in public sector supply chains, and many of them

already publish their own statements. We continue to work with them to identify, prevent and mitigate modern slavery in their operations and supply chains.

This statement covers the steps taken by the department between 1 April 2020 to 31 March 2021 to prevent modern slavery in our supply chains.¹ It also outlines future steps we will take to strengthen our efforts in tackling modern slavery.

DCMS - who we are

As an organisation, we employ 1,825 people. This includes 113 temporary workforce. There are 26 people in the central commercial team, including 11 CIPs-accredited procurement leads.²

DCMS operates primarily within the UK, and although many of our policy areas have an international focus, we don't have a physical presence outside the UK. DCMS is currently taking forward a locations strategy to create a more comprehensive national presence in line with the government's [Places for Growth](#) goals.

Our supply chains

In 2020-21, DCMS contractual spend was £90,209,204. Table 1.1 outlines the total number of contracts, broken down into contract classification. Our top 5 categories of spend are:

1. professional services
2. consultancy
3. property occupation
4. legal
5. IT costs

Assessed contract summary 2020-21

Contract classification	Number of agreements
Bronze	326
Silver	80
Gold	1
Total	407

Table 1.1 contract classification

Contracts are classified using a range of criteria, including total contract value, complexity of delivery, risk profile and contract management capability. Gold contracts are generally high value, high complexity or business critical. Silver contracts are medium value and medium complexity, while Bronze are generally low value and not critical to business.

¹ The financial year ending 31 March 2021, hereafter 2020-21

² Correct as of 31 March 2021

Supplier locations

All of our tier 1 suppliers are registered in the UK and Ireland. The table below shows parent company headquarters locations.

Parent company location	Number of suppliers
UK	247
USA	10
EU	4
Japan	1

Table 1.2 parent company locations

Key ‘unknown’ supply chain data and plans to develop understanding

DCMS currently has oversight and an understanding of its tier 1 suppliers across the department and its ALBs. Our awareness and visibility of our tiered supply chain is limited and a general area of focus for the next financial year.

A supply chain management team has been formed to map our supply chains and extend visibility to sub-tier suppliers. In addition, the team will improve the department's market and sector intelligence, actively monitoring activity and trends within DCMS specific areas.

The supply chain management team will work with the Commercial Projects & Policy Unit to ensure that modern slavery is considered as part of supply chain mapping and that increased visibility of subcontractors is utilised to identify risks. A strategic supplier relationship management plan is also being formalised which will involve working with suppliers to manage risks within their organisations, including modern slavery risks.

An initial review of our ALB supply chains indicated that the majority of ALBs embed key commercial policies (including anti-slavery) in their commercial activities and outcomes. This review will be expanded to include detailed analysis across the end-to-end non-departmental public bodies and executive agencies’ supply chains. We will use this to identify which ALB suppliers are at higher risk of breaching modern slavery requirements and target any historic contracts currently without modern slavery requirements included.

Internal governance of anti-slavery work

Our Anti-Slavery Advocate at DCMS is the Commercial Director, who ensures that the department is taking a strategic approach to preventing modern slavery risks in our supply chains.

Our Head of Commercial Operations is a member of the cross-government Modern Slavery and Procurement Implementation Group, and is responsible for implementing anti-slavery

policies and processes across the department. The Commercial Projects & Policy Unit acts as the working-level team.

DCMS also convenes an internal Modern Slavery Advisory Group, bringing together relevant policy teams from across the department to provide advice on developing strategies that reflect our wider policy priorities in the areas of ethical trading, civil society and the tech sector.

Section 2: Policies in relation to modern slavery

In line with wider government, DCMS has promoted, implemented and enforced [Procurement Policy Note 05/19](#) (PPN 05/19) by applying the policies to existing contracts and new procurement activity.

Specifically, DCMS has:

- used the guidance '[Tackling Modern Slavery in Government Supply Chains](#)' to identify and manage risks in both existing contracts and new procurement activity
- ensured that relevant procurement, commercial and front-line staff receive awareness training on how to identify modern slavery and steps to tackle it effectively - including reporting it through appropriate channels
- made relevant staff and the staff of our ALBs aware of the Modern Slavery Helpline on Tel: 08000 121 700 or online at: www.modernslaveryhelpline.org
- conducted a full review of procurement processes to identify opportunities to strengthen anti-slavery practices - including amending the departmental procurement strategy and inserting additional anti-slavery clauses into standard terms & conditions for suppliers
- Ensuring contract managers use the Government Commercial Function's (GCF) '[Professional Standards](#)' - including guidance on unethical behaviour

We have raised contract management capability across DCMS and ALBs through contract management accreditation, exceeding our 2020 to 2021 target of 180 contract managers completing the GCF contract management foundation training. To date, 88% of our contract managers have attended the DCMS contract management capability programme induction training across 21 sessions in 2021.

DCMS human resources (HR) policy

The terms and conditions of service for government departments and agencies are set out in the Civil Service management code.

The Civil Service human resources function provides policies and guidance on topics including fixed-term appointments, agency workers, and employee relations which the department adjusts to reflect our specific needs. Any adjustments are done in consultation with our senior leadership team and employee networks.

To manage the risk of exploitation of directly employed staff, the government has a system of rigorous employment checks. Due to our comprehensive policies and processes for employing staff we consider the risk of slavery, including forced labour, to be low in our directly employed workforce.

We operate on the following principles:

- providing safe and hygienic working conditions – we are committed to providing a safe working environment for all our people, with 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 – DCMS does not employ anyone under the age of 16, although occasional placements (usually lasting no more than 2 weeks) for school pupils may also be considered for work experience
- living wages are paid – our lowest paid salary range is over the National Living Wage. The salary range for our internships is also higher than the National Living Wage

Departmental specific policies relevant to modern slavery

DCMS and the Cabinet Office have worked with departmental commercial and policy teams and supplier representative bodies to develop the [Social Value Model](#). The Civil Society & Youth Directorate has an ongoing commitment to social value following its recent transformation. Officials continue to work with the Voluntary, Community and Social Enterprise (VCSE) Crown Representative and DCMS commercial colleagues, to ensure that social value is integrated, where appropriate, throughout DCMS procurement.

One key policy outcome of the Social Value Model is to '[tackle workforce inequality](#)'. This outcome and its related award criteria and reporting metrics are potentially relevant when vulnerability to modern slavery threats is a consideration in the contract supply chain.

Wider policy work to tackle modern slavery

The DCMS Commercial Projects & Policy Unit chairs an internal Modern Slavery Advisory Group, bringing together relevant policy teams from across the department.

The objectives of the group are:

- to provide cross-cutting advice on developing strategies that reflect our wider policy priorities
- to provide sector insight into modern slavery risks beyond the department's (and ALB) supply chains
- to provide technical advice from corporate teams (e.g. HR advice on employment practices)
- to share lessons learnt and best practices
- to ensure a joined-up approach to anti-slavery related work, bringing together colleagues that work with the Home Office Modern Slavery Unit, and create a coordinated modern slavery workstream across the department

Section 3: Risk assessment and due diligence

Approach to prioritising anti-slavery activity

Using PPN 05/19 and the Cabinet Office guidance as methodology, all Gold and Silver contracts (81 in total) live in 2020-21 were risk assessed by our Commercial Projects & Policy Unit and reviewed by our Head of Commercial Operations and Anti-Slavery Advocate. In order to create a complete picture, all live Bronze contracts were then also assessed (326 in total). While none of our contracts were rated as High risk, we identified 19 contracts as Medium Risk, with the rest rated as Low or Very Low risk.³

Internal risk assessment

The 407 contracts assessed were all live during 2020-21. Table 3.1 outlines the breakdown of these contracts by classification.

Rating	Gold	Silver	Bronze	Total
High Risk	0	0	0	0 (0%)
Medium Risk	1	4	14	19 (4.7%)
Low Risk	0	21	110	131 (32.2%)
Very Low Risk	0	55	202	257 (63.1%)
Total	1	80	326	407

Table 3.1 risk ratings and contract classification for DCMS contracts

In line with Cabinet Office risk assessment guidance, we considered the following in our assessment:

- industry type
- type of commodity
- supplier location
- context in which the supplier operates
- business/supply chain models
- nature of workforce

The findings from our assessment are shown in table 3.2.

³ Two of the 19 contracts were provided by the same supplier.

Assessment criteria	Industry Type	Type of Commodity	Supplier Location	Supplier operating context	Supply chain models	Nature of workforce
Number of contracts	17	11	0	4	19	17

Table 3.2 risk areas identified across Medium-rated contracts - e.g. all 19 have complex supply chain models, only 11 out of 19 concern a high-risk commodity.

Where contracts have been identified as Medium risk, this is due to a number of factors. Tier 1 supplier location does not present significant risk; all of the suppliers are UK based, and although two of the 19 Medium rated suppliers have parent companies based overseas, neither of these rank as high risk on the [Global Slavery Index](#). Ireland in particular ranks highly in terms of government response to tackling modern slavery. Additional tiered mapping needs to take place in order to develop a clear picture of any high risk locations beyond tier 1. In both cases, other contributing factors have resulted in the Medium rating, rather than supplier location. The context in which the supplier operates also presents less risk. Just half of the 19 contracts were identified as potentially at risk due to the nature of the workforce, such as potential reliance on 'low skilled' labour.

All 19 contracts were rated as Medium due to their business or supply chain model. This was because the following were identified:

- sub-contracting
- complex supply chains
- complex employment relationships with layers of separation between employers and workers

All 19 Medium rated suppliers were contacted to complete the Modern Slavery Assessment Tool ([MSAT](#)). The MSAT is a modern slavery risk identification and management tool. This tool has been designed to help public sector organisations work in partnership with suppliers to improve protections and reduce the risk of exploitation of workers in their supply chains. It also aims to help public sector organisations understand where there may be risks of modern slavery in the supply chains of goods and services they have procured.

The tool is a series of questions about the processes organisations have in place for managing modern slavery risks in order to provide good practice recommendations on how to improve their anti-slavery processes based on the six themes in the Home Office's modern slavery guidance. It is also proportional in the evaluation of risk, considering the size of organisation, and in the suggested mitigations.

MSAT completions 2020-21

In total, 14 suppliers completed the MSAT for 2020-21. This included 2 Government strategic suppliers and 5 SMEs. A full breakdown of responses and scores can be found in table 3.3.

Contract Classification	Strategic Supplier	SME/CSE	Score	Governance	Policies & Procedures	Risk Assessment & management	Due Diligence	Training	KPIs
Gold			79%	100%	91%	100%	44%	60%	100%
Bronze	YES		86%	100%	82%	80%	74%	100%	100%
Silver		SME	67%	100%	85%	45%	58%	60%	0%
Silver			66%	97%	71%	87%	39%	60%	0%
Bronze			70%	100%	100%	40%	62%	60%	0%
Bronze		SME	71%	94%	100%	91%	39%	60%	0%
Bronze			48%	78%	42%	49%	31%	60%	43%
Bronze			82%	100%	100%	93%	63%	100%	43%
Bronze		SME	67%	87%	0%	96%	42%	60%	71%
Bronze	YES		81%	100%	85%	96%	68%	60%	71%
Bronze		SME	31%	0%	73%	36%	24%	0%	0%
Bronze			58%	100%	71%	73%	20%	40%	43%
Bronze		SME	0%	0%	0%	0%	0%	0%	0%
Silver			43%	100%	38%	37%	13%	40%	0%

Table 3.3 supplier MSAT results

General trends from MSAT and how we will work to act on these findings

The majority of suppliers scored particularly well in the area of governance. Suppliers' Policies & Procedures and Risk Assessment & Management scores were mixed, although some suppliers scored highly in these areas. Areas of concern where on average suppliers' scores were particularly low were Due Diligence, Training, and KPIs. We also noted that two of the five SMEs had particularly low overall scores, achieving 0% in some or all areas. We recognise that the SME context is different to that of large multinationals, and will ensure a supportive approach to these SMEs in line with our ['Small and Medium Enterprises Action Plan'](#).

The top 5 recommendations provided to our supply base were as follows:

1. to consider developing key performance indicators relating to policy on modern slavery
2. to consider modern slavery during each stage of the procurement process
3. to reconsider how it investigates suppliers' modern slavery risks
4. to put processes in place for responding to a report of suspected instances of modern slavery that follows good practice
5. to ensure modern slavery policies and codes include the provisions described in Home Office guidance

We will be running a series of workshops with Medium Risk suppliers to advise them on implementing the above recommendations throughout 2021-22. We will conduct follow up conversations to create action plans for suppliers to improve on their anti-slavery activities. These action plans will be reviewed regularly to ensure suppliers are on track to meet targets. We will also focus on supporting our SMEs to strengthen their anti-slavery activity without placing undue burden on them. Where applicable, we will work with the Crown Commercial Service to support the approach to strategic suppliers.

Plans to strengthen risk assessment process

For 2021-22, all new Silver and Gold contracts will be risk assessed by the Commercial Projects & Policy team on a monthly basis. Risks will be recorded in a risk register overseen by the Anti-Slavery Advocate.

Changes to our procurement guidance, as well as improved training for procurement staff, will mean that risk assessment takes place earlier on in the commercial lifecycle, with modern slavery risks considered once a procurement need is identified and before any market engagement takes place. This will ensure that modern slavery risk assessment is embedded in procurement strategies from the beginning.

Process for monitoring modern slavery risks

We will continue to use the Cabinet Office risk assessment guidance and the MSAT to engage with suppliers. Should we identify any high-risk contracts during the financial year 2021 to 2022, we will engage with suppliers to recommend they conduct a full supply chain audit.⁴

In 2021-22, we will offer training to DCMS contract managers to help them to identify risks and indications of modern slavery. This will ensure better risk assessment throughout the contract lifecycle.

Engagement with external stakeholders

We will also increase our engagement with external stakeholders to improve understanding and modern slavery risk management, not just as a department but also in our sectors. In particular, we will look to engage with sector bodies in the following areas:

⁴ Financial year ending March 31 2022, hereafter 2021-22.

- tourism
- technology
- major events
- digital infrastructure and telecommunications

Implementation of social value in procurement policy

As previously mentioned, social value is a key departmental policy. Since implementation, the following policy outcomes have been evaluated as part of in scope procurements, in consultation with the social value leads in the Civil Society and Youth Directorate:

- increase supply chain resilience and capacity
- create new businesses, new jobs and new skills
- improve health and wellbeing
- effective stewardship of the environment
- tackle workforce inequality (with specific reference to modern slavery)

For one of our most complex major procurements, the outcome 'modern slavery risks are reduced' was included in the procurement strategy. Where workforce equality has not been included as social value criteria, this is due to the nature of the contract. Our procurement guidance and strategy explicitly points procurement staff and contract managers towards the opportunity to use model award criteria 6.3 ('demonstrate action to identify and manage the risks of modern slavery in the delivery of the contract, including in the supply chain') for in scope procurements where relevant.

Implementation of responsible purchasing practices

The department's policy is to comply with the Institute of Credit Management's [Prompt Payment Code](#), of which DCMS is an [approved signatory](#). Whilst the department's standard terms and conditions for the supply of goods or services specify payment within 30 days of receipt of a valid invoice, the department aims to pay all valid invoices within 5 working days of receipt.

In 2020-21, 87.2% of undisputed invoices were paid within 5 working days against the [target](#) set by the Cabinet Office of 90%. Continued efforts have been made to streamline the department's processes to ensure that payments can be processed as promptly as possible while maintaining a suitable level of controls to ensure that invoices are valid and that the related services have been delivered.

Suppliers to DCMS and its ALBs are expected to treat their supply chains fairly. To support this there are a number of requirements placed upon suppliers regarding responsible purchasing practices and fair treatment over and above minimum legal obligations, throughout the procurement lifecycle. When assessing a supplier's payment history of its supply chain during tender evaluation (if applicable), a poor demonstration or a missing robust action plan can lead to exclusion from selection entirely. Exclusions are monitored and shared, including to DCMS' ALBs. There have been no exclusions since the

implementation of the revised thresholds including in 'Procurement Policy Note [07/20](#)'. Where applicable, DCMS takes into account payment approaches in the procurement of major government contracts, as per 'Procurement Policy Note [04/18](#)'.

DCMS has a good track record of a high level of SME spend across its family and shows that responsible payment practices are encouraged throughout our supply chain. The monitoring of supplier's SME spend is an embedded contract management reporting criteria within DCMS' standard contractual terms and allows DCMS to track SME spend throughout the year. The spend is collected across DCMS and its ALBs which is reported quarterly and published [annually](#).

DCMS are working to support further responsible purchasing practice initiatives including improving internal data capture and systems, reviewing supplier's current payment practices regardless of contract classification, and internal and external awareness and promotion of the Prompt Payment Code throughout our supply chain.

Section 4: Training and awareness raising

Training for staff

All 11 procurement staff have undertaken the Chartered Institute of Procurement & Supply (CIPS) ethical procurement and supply [e-learning](#) training.

All 3 commercial policy staff completed the London Universities Purchasing Consortium [e-learning](#) suite on protecting Human Rights in the supply chain.

To improve ALB understanding of this topic, DCMS has:

- held a workshop with a discussion session focused on modern slavery
- delivered a training session for all DCMS ALBs
- circulated a DCMS-focused slide deck on modern slavery
- directed ALBs towards the modern slavery training [resources](#)

Reported improvements in understanding

After completing the CIPS e-learning:

- 85% of our procurement staff felt that they were able to recognise situations where they needed to consider ethics and social responsibility
- 85% felt prepared to respond to a situation with an ethical or social responsibility dimension
- 100% stated a commitment to ethical procurement and supply
- all staff reported having an understanding of the topic of modern slavery - 71% reported a 'good' understanding, 14% 'some' understanding, and 14% 'excellent' understanding
- 71% felt confident in tackling modern slavery risks in procurement

Feedback from procurement staff indicated that they would benefit from training specifically tailored to the topic of modern slavery. This will be provided in 2021-22 using the [new Modern Slavery e-learning](#), in order to improve levels of self-reported understanding. We will also extend training to DCMS contract managers. We will continue to work with our ALBs to provide training support; further information can be found in the next section.

Section 5: Arm's length bodies

Most of the work that people know us for is carried out by the [45 public bodies](#) that support the department. As mentioned in Section 1, an initial review of our ALB supply chains indicated that the majority of ALBs embed key commercial policies (including anti-slavery) in their commercial activities and outcomes. We plan to expand this review to include detailed analysis across ALBs supply chains. DCMS ALBs are committed to ethical procurement and supply, and we will provide support to them in the following areas throughout 2021-22:

- investigating supply chains, noting this is particularly challenging given small procurement teams (sometimes just less than 1 full-time equivalent)
- more tools to help identify and manage risks
- clear points of contact for advice on modern slavery
- advice on what action to take once risks are identified
- training opportunities and resources

Following outcomes of the '[Transparency in Supply Chains](#)' consultation in 2020, DCMS ALBs with a budget of of £36 million or more will be [required](#) to publish a statement. In future, we will explore the possibility of publishing a group statement with our ALBs. 16 DCMS ALBs already publish a Modern Slavery Statement, which can be viewed on their respective websites. In future, statements will also be uploaded to the new government [modern slavery statement registry](#).

Section 6: Goals and Key Performance Indicators (KPIs)

This section outlines our progress against the goals set out in the government Modern Slavery Statement, as well as our KPIs for the next financial year.

Departmental goals

Goal	Progress
Appoint an anti-slavery advocate	Complete
Develop Key Performance Indicators	Complete
Review, and where relevant, amend procurement policies following publication of PPN 05/19	We have conducted a full procurement review to ensure modern slavery is considered throughout the procurement and contract lifecycle. See Section 2
Begin or continue contract risk assessments to ensure action plans are targeted	All live contracts have been risk assessed for 2020-21, using the Cabinet Office assessment tool
Invite all their major suppliers in medium or high risk areas to complete the MSAT with follow up meetings	Although we did not identify any high risk areas, all suppliers identified as medium risk have been invited to complete the MSAT. Follow up meetings will be held throughout 2021-22
Begin mapping tier 2 suppliers for high risk supply chains	We have taken some action in this area and will continue to develop; see KPIs
Participate in training (to build capacity internally) and cross government working groups to collaborate on common interests.	Our procurement staff have completed the CIPS ethical procurement and supply e-learning training. Our commercial policy team (3 people) have completed the LUPC eLearning suite on protecting Human Rights in the supply chain DCMS is represented at the Anti-Slavery Advocates meeting and Modern Slavery Implementation Group

KPIs used to monitor effectiveness

Our KPIs for the next financial year will be used to hold us to account for progress on anti-slavery activity, and ensure ongoing improvements are made. They are divided into the following categories:

- risk assessment and management
- due diligence process
- wider engagement and training activities

Risk assessment and management

KPI 1 - work with our new supply chain management team to extend visibility to sub tier suppliers, mapping to at least Tier 2 by Spring 2022 for gold and silver contracts

KPI 2 - aim for a 85% supplier completion rate of the Modern Slavery Assessment Tool where identified as necessary (improving on 78% this year)

KPI 3 - continue to risk assess at least all new Gold and Silver contracts

Due diligence processes

KPI 4 - conduct MSAT follow-ups with all of our strategic suppliers by Spring 2022

KPI 5 - for any high-risk contracts, working with suppliers to support them in conducting a supply chain audit

KPI 6 - embed anti-slavery clauses into any high-risk contracts

KPI 7 - ensure that every identified instance of modern slavery and labour exploitation is remediated

KPI 8 - reduce the average time taken to pay invoices - pay 90% of undisputed and valid invoices from SMEs within 5 days and 100% of all undisputed and valid invoices within 30 days

Wider engagement and training activities

KPI 9 - for all new procurement staff to have completed the CIPS ethical procurement and supply e-learning training within 3 months of their start date

KPI 10 - achieve 60% uptake for commercial staff undertaking the Government Commercial College's 'Tackling Modern Slavery' e-module

KPI 11 - provide at least three training opportunities to DCMS contract managers and DCMS ALBs by Spring 2022

KPI 12 - ensure ALB readiness for publishing a 2021-22 statement

KPI 13 - increase the reach of the DCMS Modern Slavery Advisory Group, by involving additional policy areas

Approved by Executive Board: 15/09/2021

Approved by Secretary of State: 04/10/2021



Signed by Accounting Officer

Date: 12/10/2021