

Appendix 3 - Modern Slavery & Exploitation (MSE) Action Plan

This will be developed into WCC Modern Slavery Statement, which will be consulted on in January 2022.

	Actions	Current progress and plans	Timelines
<p>Step 1: Align with internal and external frameworks - Ensuring harmonisation of the approach with internal strategies, initiatives and functions to maximise impact and ensure alignment with internal teams</p>	<ul style="list-style-type: none"> a) Ensure plans are aligned with: <ul style="list-style-type: none"> i. Guiding principles on Business & Human Rights ii. Modern Slavery Act 2015 and enactment of Transparency in Supply Chains Bill iii. Bi-borough Modern Slavery Strategy: Theme 4 – Exploitation Prevented b) Review available guidance for each public procurement spend category c) Undertake departmental consultation, especially those delivering front line services d) Research peer initiatives and lessons learned 	<ul style="list-style-type: none"> a) Actions taken to date are informed by the legislation and principles listed b) Spend category review being undertaken c) Procurement is part of the WCC and tri-borough MSE Group, with representatives from VCSE, Police, Academic Institutions, local authorities and other agencies d) Procurement is on the steering group of the London Responsible Procurement Network (LRPN), a group which shares progress and lessons learned 	<ul style="list-style-type: none"> a) Ongoing b) Q3 2021/22 c) Ongoing d) Ongoing
<p>Step 2: Knowledge gathering and industry context - Work to understand industry maturity and performance and enable prioritisation of high risk spend categories</p>	<ul style="list-style-type: none"> a) Gauge levels of maturity in due diligence and supply chain transparency in each industry sector b) Receive train-the-trainer workshops from subject matter experts ‘Action Sustainability’ c) Roll out training on MSE in supply chains to procurement, service leads and contract managers d) Learn from subject matter experts including participation in focus groups and roundtables 	<ul style="list-style-type: none"> a) Category approach being developed b) Train-the-trainer workshops to be delivered to five WCC core MSE staff and procurement leads covering high risk categories (and five from RBKC) c) Training to be rolled out more widely d) Westminster is now part of a roundtable on human & labour rights associated with solar panel components 	<ul style="list-style-type: none"> a) Q3 2021/22 b) Q4 2021/22 c) Q1 2022/23 d) Q3 2021/22 onwards
<p>Step 3. Category standards - Creation of category specific standards, development of standardised frameworks and mechanisms for implementation and monitoring</p>	<ul style="list-style-type: none"> a) Identify the highest risk (sub) categories in our domestic and global supply chain b) Identify front line services with the best opportunity to identify potential victims of modern slavery c) Establish sets of contractual measures by category d) Design Action Plan templates to assist contractors with fulfilling their reporting requirements e) Examine procurement frameworks used to understand MSE requirements set at the outset 	<ul style="list-style-type: none"> a) Risk assessment being undertaken b) Category assessment being undertaken c) Framework being undertaken d) Templates to be written following framework development e) Framework assessment to be undertaken 	<ul style="list-style-type: none"> a) Q3 2021/22 b) Q3 2021/22 c) Q3 2021/22 d) Q4 2021/22 e) Q4 2021/22 onwards

<p>Step 4. Procurement & Commissioning - Development of targeted procurement and commissioning techniques and frameworks</p>	<p>a) Include modern slavery and human right due diligence requirements into all relevant contracts:</p> <ul style="list-style-type: none"> i. Introduce tiered Supplier Code of Conduct requirements ii. Contractual requirements on supply chain mapping, action plans to minimise risk and reporting <p>b) Hold quarterly meetings with each high-risk supplier to monitor progress, agree corrective actions if risks not appropriately managed, support where possible, audit/spot check where necessary, work with the business to resolve infringements where identified, refer potential victims in our direct supply chain to relevant National Referral Mechanism/WCC support</p>	<p>a) Procurement & Commissioning activities are now being risk assessed at CGRB</p> <ul style="list-style-type: none"> i. Supplier Code of Conduct now being developed, which must be committed to in order to bid ii. Generic wording is being used; (category specific interventions to be developed) <p>b) Meetings to be set up for each high-risk contractor</p>	<p>a) Q2 2021/23</p> <ul style="list-style-type: none"> i. Q3 2021/22 ii. Q3 2021/22 <p>b) Q4 2021/22 onwards</p>
<p>Step 5. Supplier Relationship Management - Partnership working as part of supplier relationship management to identify and mitigate risks and leverage opportunities</p>	<p>a) Identify highest risk, highest spend current suppliers</p> <p>b) Review and assess their Modern Slavery Statements</p> <ul style="list-style-type: none"> i. Identify relevant risks within our supply chain ii. Request reports on how they are applying the due diligence set out in their MS Statement to our contract <p>c) Develop process to address risks where identified</p> <p>d) Support new suppliers with undertaking MS contractual requirements</p>	<p>a) Existing contracts are currently being assessed based on spend, nature of the contract in terms of goods & services provided</p> <p>b) MS Statements to be assessed</p> <p>c) Process to be developed</p> <p>d) Support will be provided to relevant contractor staff as part of WCC's contract management approach to RPC</p>	<p>a) Q3 2021/22</p> <p>b) Q4 2021/22</p> <p>c) Q4 2021/22</p> <p>d) Q4 2021/22 onwards</p>
<p>Step 6. Continuous Improvement - Ongoing progression involving learning lessons, adapting approaches, celebrating success and then increasing and broadening ambitions.</p>	<p>a) Collate and evaluate lessons learned and data on due diligence, feed this into updates of MS Statement</p> <p>b) Collaborate with and feed back to Bi-borough Tackling Modern Slavery and Exploitation Group</p> <p>c) Undertake workshops and share resources with peers and industry/university/ subject matter experts</p> <p>d) Review affiliation with Ethical Trading Initiative (ETI), Electronics Watch, Sedex and other expert/ audit organisations to assess potential value adds</p>	<p>a) A framework/ template to capture lessons learned to be developed</p> <p>b) Procurement are in regular attendance</p> <p>c) This will happen through London Heads of Procurement (LHoP), LRPN, the Business, Human Rights & Environment multi-agency group led by Greenwich University and Action Sustainability</p> <p>d) Review still to be undertaken</p>	<p>a) Q1 2022/23 onwards</p> <p>b) Ongoing</p> <p>c) Q1 2022/23 onwards</p> <p>d) Q2 2022/23</p>