

## **Modern Slavery and Human Trafficking Statement – 2019/20**

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by UK Shared Business Services Ltd (UK SBS) during 2019/20 to prevent modern slavery and human trafficking in its business and supply chains.

UK SBS is a private company limited by shares but is also classed as a public body and is subject to all applicable UK legislation, required to comply with all relevant Government policies and guidance for public bodies, including *Managing Public Money*. The Company operates solely in the UK and all employees are public servants.

The Company provides services – Human Resources, Payroll, Finance, Information Systems and Services (ISS) and Procurement - to its owners and their partner organisations, all of which are also UK public bodies and contracting authorities. As contracting authorities, all are subject to European public procurement rules and UK Government implementing legislation, namely the Public Contracts Regulations (PCR), associated government policies and guidance.

### **Policies and Contractual Controls**

Government policy includes a requirement on public bodies to use Crown Commercial Service (CCS) frameworks and contracts where it is possible to do so. The Company's Procurement Service leads on procurement through CCS frameworks and undertakes bespoke procurements where the goods or services required by clients cannot be sourced through central arrangements.

In early 2016, UK SBS introduced its own initiative to deploy a mandatory requirement for suppliers to declare their compliance with Section 54 of the Modern Slavery Act 2015 (MSA) (if the supplier was within scope of the Act) as part of the procurement process. CCS issued Procurement Policy Note (PPN) 08/16 in September 2016 to which the MSA was addressed as part of the selection stage for above EU threshold procurements only.

UK SBS procurement has implemented further requirements by way of selection type questions to procurements that are captured by the applicable below threshold values of the PCR to address the MSA down to the £10k and £25k values. Below these thresholds for high volume, low value commitments typically made by Purchase Orders, procurement has, by incorporation through compliance with the laws of England and Wales for Purchase Order commitments, provided obligations upon the supply chain to also comply with the MSA.

The procurement team also actively assists clients as Contracting Authorities to address the MSA on all procurements. If a Contracting Authority needs to utilise alternative contractual adaptation (e.g. NEC3 for Construction / FM) a bespoke generic set of MSA terms and conditions are available that can be applied and incorporated within any form of contract.

UK SBS procurement continues to be a valued member and contributor at the Government's Procurement Policy Working Group (PPWG) meetings in the Cabinet Office, influencing and shaping Government policy. In conjunction with other departmental bodies and the Government Commercial Function, the PPWG created a new PPN 05/19 covering the Government's transparency in supply chains statement to address the MSA. This has been suitably incorporated by UK SBS via the procurement teams Document Change Review Board (DCRB) into its sourcing documents to go further in addressing the MSA in public procurement.

Supplier management is in place for strategic suppliers as an integral part of CCS and UK SBS category management. Strategic suppliers are defined as such through a combination

of the value, complexity, volume, bespoke nature and impact of the contracts. Supplier management includes active performance and risk management, including risks within the supplier's supply chain.

The results of the GIAA internal audit report on UK SBS procurement in 2018 confirmed that the clauses contained within procurement contracts issued by UK SBS comply with the Act.

The Company maintains a Code of Conduct and policies on Corporate Social Responsibility, Whistleblowing (published on the website), Procurement, Risk Management and Inclusiveness as part of a wider suite of policies. All of these are easily accessible by all UK SBS employees and are reviewed on at least an annual basis.

### **Our Supply Chain**

UK SBS contracts directly with approximately 230 suppliers providing mainly IT hardware, software and associated support, contingent labour, legal and professional services, facilities management including office rentals and travel booking services. UK SBS suppliers have been appointed primarily through CCS frameworks. Modern Slavery statements are also requested from those suppliers in scope of the Act as part of the supplier assurance process.

Where the Company, its clients or suppliers develop any concerns relating to modern slavery (or any other matter) for contracts in operation, they are raised with the CCS and/or UK SBS procurement service for investigation and resolution; contract termination is an option if the particular circumstances warrant such action.

### **BEIS Supplier Data Analysis**

In 2017/18, UK SBS conducted an online survey that was issued to high spend or critical service suppliers for the Department for Business, Energy and Industrial Strategy (BEIS). In total there were 54 participants; 27 of which had a turnover greater than £36m and therefore a legal obligation to comply with the Modern Slavery Act 2015. Classification was based on analysis of contract value, project risk, contract complexity and supply market complexity and covered a wide range of topics including general information about the business, its supply chains and the countries in which it operates, policies and procedures they had in place to help prevent Modern Slavery and suppliers' activities, including the prevalence and frequency of supplier audits that are conducted.

In the summer of 2018, a review of the questions within the online survey and ways in which the platform could be made more user friendly was being considered by the Home Office. At the time of writing this statement, the release of a subsequent survey has been delayed until further notice.

In the meantime, without the 2018/19 or 2019/20 data available for comparison, UK SBS have introduced a commercial intelligence section on the supplier portal to indicate a Modern Slavery (red, amber, green) RAG Status to provide an alert system to our UK SBS procurement professionals when working with high risk suppliers. This will promote increased visibility when working with our suppliers in the future.

### **Modern Slavery Training**

UK SBS has developed, in conjunction with UK Research and Innovation (UKRI), a bespoke training package, aimed primarily at the Procurement and ISS Supplier Integration and Management teams (approx. 100 employees), both of which are directly involved in supply chain management and / or the procurement process. The Risk, Information and Security Compliance, Corporate HR and Executive teams are also required to undertake the training.

As at the date of this statement, 96% had completed the training. An awareness campaign to all UK SBS employees was launched in May 2020 to help increase understanding of modern slavery, identify key indicators of potential modern slavery and highlight where to find further information or to report suspected incidents.

### **Modern Slavery and COVID-19**

UK SBS continues to identify and address risks of modern slavery within its operations and supply chain throughout the COVID-19 pandemic via those actions mentioned within this statement. The health and safety of UK SBS employees is of utmost importance to the Company, with local and national government guidelines and policies on social distancing and payment of statutory sick pay implemented where applicable.

The payment of suppliers, employees and grants are priority activities for UK SBS and the Company is continuing to adhere to the government's prompt payment guidelines to help protect the payment of wages within supply chains.

A review of internal policies, including grievance procedures, has taken place to align them to the Company's new approach to working from home and ensure they are applicable and accessible to UK SBS employees whilst working remotely. Additional signposting to the Employee Assistance Programme has been provided for employees to access independent, confidential advice and the modern slavery awareness campaign that took place in May 2020 highlighted contact information to report suspected incidents.

Recruitment activity both within UK SBS and on behalf of our clients continues with sustained rigorous checks in place to eliminate the risk of vulnerable workers being exploited by third parties during the crisis.

### **Next Steps**

In 2020/21, UK SBS will undertake the following activities and report on them within future modern slavery statements:

- Continued monitoring of those suppliers identified by the BEIS supplier data analysis undertaken in 2018 and conduct a similar exercise once the questionnaire and guidance has been updated.
- As part of a wider review of Key Performance Indicators (KPIs), the consideration and inclusion of KPIs specific to Modern Slavery reporting measures.

This statement was approved by the UK SBS Board on 11 June 2020.



**Richard Semple**  
**Chief Executive**

Signed on behalf of the UK SBS Board