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		Cu	Current progress and plans		Timelines	
Step 1: Align with	a)	Ensure plans are aligned with:	a)	Actions taken to date are informed by the	a)	Ongoing	
internal and external		i. Guiding principles on Business & Human Rights		legislation and principles listed			
frameworks - Ensuring		ii. Modern Slavery Act 2015 and enactment of	b)	Spend category review being undertaken	b)	Q3 2021/22	
harmonisation of the		Transparency in Supply Chains Bill	c)	Procurement is part of the WCC and tri-	c)	Ongoing	
approach with internal		iii. Bi-borough Modern Slavery Strategy: Theme 4		borough MSE Group, with representatives			
strategies, initiatives and		 Exploitation Prevented 		from VCSE, Police, Academic Institutions,			
functions to maximise	b)	Review available guidance for each public		local authorities and other agencies			
impact and ensure		procurement spend category	d)	Procurement is on the steering group of	d)	Ongoing	
alignment with internal	c)	Undertake departmental consultation, especially		the London Responsible Procurement			
teams		those delivering front line services		Network (LRPN), a group which shares			
	d)	Research peer initiatives and lessons learned		progress and lessons learned			
Step 2: Knowledge	a)	Gauge levels of maturity in due diligence and supply	a)	Category approach being developed	a)	Q3 2021/22	
gathering and industry		chain transparency in each industry sector	b)	Train-the trainer workshops to be			
context - Work to	b)	Receive train-the-trainer workshops from subject		delivered to five WCC core MSE staff and	b)	Q4 2021/22	
understand industry		matter experts 'Action Sustainability'		procurement leads covering high risk			
maturity and	c)	Roll out training on MSE in supply chains to		categories (and five from RBKC)			
performance and enable		procurement, service leads and contract managers	c)	Training to be rolled out more widely	c)	Q1 2022/23	
prioritisation of high risk	d)	Learn from subject matter experts including	d)	Westminster is now part of a roundtable	d)	Q3 2021/22	
spend categories		participation in focus groups and roundtables		on human & labour rights associated with		onwards	
				solar panel components			
Step 3. Category	a)	Identify the highest risk (sub) categories in our	a)	Risk assessment being undertaken	a)	Q3 2021/22	
standards - Creation of		domestic and global supply chain	b)	Category assessment being undertaken	b)	Q3 2021/22	
category specific	b)	Identify front line services with the best opportunity	c)	Framework being undertaken	c)	Q3 2021/22	
standards, development		to identify potential victims of modern slavery	d)	Templates to be written following	d)	Q4 2021/22	
of standardised	c)	Establish sets of contractual measures by category		framework development			
frameworks and	d)	Design Action Plan templates to assist contractors	e)	Framework assessment to be undertaken	e)	Q4 2021/22	
mechanisms for		with fulfilling their reporting requirements				onwards	
implementation and	e)	Examine procurement frameworks used to					
monitoring		understand MSE requirements set at the outset					

Step 4. Procurement &	a)	Include modern slavery and human right due	a)	Procurement & Commissioning activities	a)	Q2 2021/23
Commissioning -		diligence requirements into all relevant contracts:		are now being risk assessed at CGRB		
Development of targeted		i. Introduce tiered Supplier Code of Conduct		i. Supplier Code of Conduct now		i. Q3 2021/22
procurement and		requirements		being developed, which must be		
commissioning		ii. Contractual requirements on supply chain		committed to in order to bid		
techniques and		mapping, action plans to minimise risk and		ii. Generic wording is being used;	i	i. Q3 2021/22
frameworks		reporting		(category specific interventions to		
	b)	Hold quarterly meetings with each high-risk supplier		be developed)		
		to monitor progress, agree corrective actions if risks	b)	Meetings to be set up for each high-risk	b)	Q4 2021/22
		not appropriately managed, support where possible,		contractor		onwards
		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				
Step 5. Supplier	a)	Identify highest risk, highest spend current suppliers	a)	Existing contracts are currently being	a)	Q3 2021/22
Relationship	b)	Review and assess their Modern Slavery Statements		assessed based on spend, nature of the		
Management -		i. Identify relevant risks within our supply chain		contract in terms of goods & services		
Partnership working as		ii. Request reports on how they are applying		provided		
part of supplier		the due diligence set out in their MS	b)	MS Statements to be assessed	b)	Q4 2021/22
relationship management		Statement to our contract	c)	Process to be developed	c)	Q4 2021/22
to identify and mitigate	c)	Develop process to address risks where identified	d)	Support will be provided to relevant	d)	Q4 2021/22
risks and leverage	d)	Support new suppliers with undertaking MS		contractor staff as part of WCC's contract		onwards
opportunities		contractual requirements		management approach to RPC		
Step 6. Continuous	a)	Collate and evaluate lessons learned and data on due	a)	A framework/ template to capture lessons	a)	Q1 2022/23
Improvement - Ongoing		diligence, feed this into updates of MS Statement		learned to be developed		onwards
progression involving	b)	Collaborate with and feed back to Bi-borough	b)	Procurement are in regular attendance	b)	Ongoing
learning lessons, adapting		Tackling Modern Slavery and Exploitation Group	c)	This will happen through London Heads of	c)	Q1 2022/23
approaches, celebrating	c)	Undertake workshops and share resources with peers		Procurement (LHoP), LRPN, the Business,		onwards
success and then		and industry/university/ subject matter experts		Human Rights & Environment multi-		
increasing and	d)	Review affiliation with Ethical Trading Initiative (ETI),		agency group led by Greenwich University		
broadening ambitions.		Electronics Watch, Sedex and other expert/ audit		and Action Sustainability		
		organisations to assess potential value adds	d)	Review still to be undertaken	d)	Q2 2022/23