



## **Modern Slavery and Human Trafficking Policy**

The Restoration and Renewal Parliamentary Works Sponsor Body ('the Sponsor Body') oppose slavery and human trafficking in all forms and make this statement to set out the steps we have taken to ensure that there is no slavery or human trafficking in our organisation in the year to 31 March 2021 and which further steps are to be taken to address the risk of modern slavery.

This statement is our second modern slavery statement.

### **Our Structure and Supply Chain**

The Sponsor Body is a statutory body established under the Parliamentary Buildings (Restoration and Renewal) Act 2019 ('the R&R Act') that has overall responsibility for the works related to (or in connection with) the restoration and renewal of the Palace of Westminster and the Parliamentary estate ('the Programme'). The R&R Act also establishes the governance structure within which the Sponsor Body will operate.

The Sponsor Body is responsible for setting the strategic direction of the project, providing leadership and good governance, liaising with parliamentarians and other stakeholders, funding and overseeing the performance of the Delivery Authority in connection with the development of proposals in connection with, and the actual carrying out of, the Parliamentary building works, and preparing the business case, which is a set of options and cost estimates.

At the time of writing the Sponsor Body itself employs 29 direct employees and has 10 secondees.

The Restoration and Renewal Delivery Authority ('the Delivery Authority') is a company limited by guarantee and was established by the Sponsor Body. The Delivery Authority is responsible for the restoration and renewal of the Palace of Westminster and related works on behalf of the Houses of Parliament. The Sponsor Body is the Delivery Authority's sole member and guarantor.

The Sponsor Body has entered into a Programme Delivery Agreement ('the PDA') with the Delivery Authority in accordance with the requirements of the R&R Act to set out the terms and conditions upon which the Delivery Authority



is to develop and deliver the Parliamentary works and the mechanism for managing the relationship between the Sponsor Body and the Delivery Authority. In addition to procuring such services and goods at the Delivery Authority may require for the purposes of developing and delivering the Parliamentary works, the Delivery Authority also procures on behalf of the Sponsor Body, such services or goods as the Sponsor Body may require from time to time. Under the terms of the PDA the Delivery Authority shall comply with, and shall procure all contractors, suppliers and sub-suppliers shall comply with, the Modern Slavery Act 2015.

Our organisation prohibits the use of modern slavery and human trafficking in all its operations and supply chain. It is committed to improving awareness of the practices necessary to combat and eliminate slavery and human trafficking and to assess the risk profile of its business in these areas. We are committed to having a high level of visibility and oversight of the Delivery Authority's supply chain to ensure that the Sponsor Body and Delivery Authority establish risk profiles and take appropriate mitigating actions.

### **Our Policies, Processes and Contracts**

The Sponsor Body recognises that slavery is not only an ethical and human rights issues, it is one of criminality. We recognise that corruption is a key factor and driver of exploitation and that it takes various forms that impact worker welfare such as forced labour, labour exploitation, poor working and living conditions, poor terms of employment, detained passports, salary deduction issues and withheld payment. These all have the deprivation of a person's liberty in order to exploit them for personal or commercial gain in common. Our organisation is committed to promoting high standards of ethical behaviour on the Programme. Our policies and processes underpin these requirements. These policies and procedures are regularly reviewed and updated as part of our Quality Management System, and include:

- Whistleblowing Policy
- Grievance Policy
- Code of Conduct
- Bullying and Harassment



- Resourcing and Recruitment Policy
- Fraud and Bribery Policy
- Equality, Diversity and Inclusion (EDI) Policy
- Procurement Policy

Our employees are required to uphold the Sponsor Body's Code of Conduct and sign adherence to this as part of our onboarding process. All colleagues are encouraged to submit anonymous feedback and seek support through our reporting guidelines contained in our Whistleblowing Policy.

The Sponsor Body requires compliance with our policies and processes relating to Modern Slavery and Human Trafficking from its sub-contractors, suppliers and agency/interim staff.

As part of its statutory duty, the Sponsor Body must oversee the activities of the Delivery Authority. This oversight includes monitoring compliance with the terms of the PDA and review of the Delivery Authority's Quality Management System, including policies relating to procurement. As part of the Delivery Authority's procurement processes, it has developed subject specific material to be included in its standard procurement templates to ensure that provisions addressing requirements relating to modern slavery and human trafficking are included in its standard contract terms. Sponsor Body oversight and monitoring of the Delivery Authority in this regard is discharged by the Sponsor Body's Risk Audit and Assurance Committee, who report to the board of directors of the Sponsor Body (see 'Governance' below).

Having completed a first full year of operation of the Sponsor Body we have now developed an implementation plan, working with the Delivery Authority, to build on our policy framework and implement further measures to ensure that we can demonstrate our commitment to eliminating modern slavery and human trafficking.

The key areas of focus for our plan will be provision of training to colleagues. Results and trends from the actions contained within the implementation plan will inform the Sponsor Body's priorities, including the development of key performance indicators over the next twelve months.



## **Governance**

Legal compliance reporting is an established part of the governance and compliance framework of the Sponsor Body and this encompasses the requirements of the Modern Slavery Act 2015. As such progress against the implementation of measures to address modern slavery and human trafficking risks will be monitored by the Risk Audit and Assurance Committee, who report to the board of directors of the Sponsor Body.

We recognise that the role of the Sponsor Body's internal assurance function and its role in assuring the work of the Delivery Authority in supporting the development and implementation of measures to address modern slavery and human trafficking needs to be developed during the coming year.

## **Training and Measuring Effectiveness**

The Sponsor Body has identified the requirements for training and outlined these in a learning and development plan, mapping out key audiences and learning outcomes. Our priority for the next twelve months will be to ensure roll out of this across the R&R Programme.

In conjunction with the training programme and to supplement our existing policies, the Sponsor Body, working closely with the Delivery Authority, will implement an internal escalation and reporting process to facilitate management of the risk of modern slavery and human trafficking.

As a relatively new organisation we are conscious of the need to inform ourselves of best practices in this area in furtherance of this have developed links with the wider Parliamentary community through the UK Parliamentary Modern Slavery Working Group.

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and was approved by the board of directors of the Sponsor Body on 26<sup>th</sup> July 2021.

**Sarah Johnson**  
Chief Executive, Sponsor Body  
6 September 2021