



Modern Slavery and Human Trafficking Policy

Our Organisation and Structure

The Parliamentary Works Sponsor Body ('The Sponsor Body') has been established by an Act of Parliament to set the scope and budget for the works required to be delivered as part of the Palace of Westminster Restoration and Renewal (R&R) programme. As a matter of law, the Sponsor Body is required to comply with the Modern Slavery Act 2015 but the Body has additionally agreed to ensure the compliance of the Restoration & Renewal Delivery Authority Ltd (Delivery Authority).

The requirement to ensure compliance with legislation for the works is passed to the Delivery Authority through the Programme Delivery Agreement. The Sponsor Body is responsible and accountable for upholding best practice in its own organisation and overseeing the compliance of the Delivery Authority. The Delivery Authority uses supply chain contracts as a mechanism to undertake the work required for these programmes.

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. The Commercial Leads for the Delivery Authority have overall responsibility for ensuring compliance.

Modern slavery is a crime and a violation of fundamental human rights. 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. This statement is drafted pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Delivery Authority Modern Slavery and Human Trafficking statement.

Our Policies, Processes and Contracts

Our organisation is committed to promoting high standards of ethical behaviour on the Programme and our policies and processes underpin this by setting minimum requirements. These policies and procedures are regularly reviewed and updated. These policies and procedures include:

- Whistleblowing Policy
- Grievance Policy
- Code of Conduct
- Resourcing and Recruitment Policy
- Fraud and Bribery Policy
- Equality, Diversity and Inclusion (EDI) Policy
- Skills and Apprenticeships Policy
- Ethical Procurement Policy



Our employees and supply chain partners are required to uphold the Parliamentary Behaviour Code and are encouraged to submit anonymous feedback and seek support through our reporting guidelines contained in our Whistleblowing Policy.

Our staff are educated on their employment rights, duties and benefits through employment contracts and open access to documents such as the policies and procedures mentioned above, which are provided on the company's internal document management system.

The Delivery Authority requires compliance with our policies and processes relating to Modern Slavery and Human Trafficking from sub-contractors, suppliers and agency/interim staff. We continue to work with our supply chain to foster long-term relationships and create an environment to tackle modern slavery practices and promote ethical labour practices.

Governance, Due Diligence and Risk Management

The Delivery Authority has an operational working group formed of a number of departments including procurement, commercial, , HR (including recruitment, skills and apprenticeships and EDI), sustainability, health, safety and wellbeing and quality management. We recognise that these departments have a role to play in our approach to tackling modern slavery and human rights issues. This working group is responsible for discussing, consulting and disseminating information for each of their respective areas with a view to raising awareness, current status updates for the Programme and proactively managing risk as the programme of works progresses.

We expect our supply chain to embrace our values and strategic themes including Health and Safety, Sustainability and Accessibility and Inclusion. Compliance with our ways of working begins at the pre-qualification stage for any works or services we procure. For employees, this begins at the candidate stage of recruitment and includes identity checks compliant with Parliamentary process.

Training

Training is a fundamental component of the approach to challenging the issues and raising awareness of modern slavery and human rights within our business and our supply chain. We believe our risk is greatest in our supply chains and will ensure that accepting training, either face to face or online, is a commitment in our contracts.

Measuring Effectiveness

The Delivery Authority acts transparently, in accordance with the Modern Slavery Act 2015, in ensuring we mitigate modern slavery risks and we identify the actions we have taken in our annual statements.

Matt White
On behalf of the Company
June 2020