

# **Modern Slavery and Human Trafficking Policy**

The Restoration and Renewal Delivery Authority 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 or supply chain 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 Restoration and Renewal Delivery Authority Limited (the Delivery Authority) is a private company limited by guarantee and incorporated under the Companies Act 2006, based in London, UK.

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, including the associated enabling works (the decant of the House of Lords and the decant of the Palace's Heritage Collections) (together 'the Programme').

The Delivery Authority reports to Parliament via the Parliamentary Works Sponsor Body (the Sponsor Body), a statutory corporation established under the Parliamentary Buildings (Restoration and Renewal) Act 2019 ('the R&R Act'). The Sponsor Body is the Delivery Authority's sole member and guarantor. At the time of writing the Delivery Authority employs 96 direct employees and has two secondees. Furthermore, the Delivery Authority employs an additional 64 contractors.

The Delivery Authority contracts with third party supply chain to undertake much of the work required for the Programme. The Delivery Authority has direct contracts with 90 suppliers all of which are based in the UK. Three of our suppliers represent 70% of our supply chain expenditure. With these key suppliers we review their sub-contracting arrangements prior to any contract awards. As our programme develops and our supplier base grows in size, we are committed to having a high level of visibility into our supply chain to establish risk profiles and take appropriate mitigating actions.



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.

### Our Policies, Processes and Contracts

The Delivery Authority 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
- Resourcing and Recruitment Policy
- Fraud and Bribery Policy
- Equality, Diversity and Inclusion (EDI) Policy
- Skills and Apprenticeships Policy
- Procurement Policy

Our employees and supply chain partners are required to uphold the Delivery Authority'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 Delivery Authority requires compliance with our policies and processes relating to Modern Slavery and Human Trafficking from sub-contractors, suppliers and agency/interim staff. As part of our procurement processes, we have developed subject specific material to be included in our standard

procurement templates and provisions addressing requirements relating to modern slavery and human trafficking are included in our standard contract terms.

Having completed a first full year of operation of the Delivery Authority we have now developed an implementation plan 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 our supply chain and we will undertake a risk assessment to identify high risk suppliers and industries and implement the Home Office Modern Slavery Assessment (MSAT). Preparations for the implementation of the MSAT are underway and results and trends from these assessments will inform the Delivery Authority's priorities, including the development of key performance indicators over the next twelve months

#### Governance

Legal compliance reporting is an established part of the Delivery the governance and compliance framework of the Delivery Authority 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 Delivery Authority.

We recognise that the role of the Delivery Authority's internal assurance function 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 Delivery Authority 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 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 Acy 2015 and was approved by the board of directors of the Delivery Authority on 26 July 2021.

**David Goldstone CBE** 

Chief Executive, Delivery Authority 26 July 2021