OFFICIAL

Modern Slavery Statement 2019/20

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## Document distribution

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## Change history

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## Abbreviations

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<th>Abbrev.</th>
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<tr>
<td>FCDO</td>
<td>Foreign, Commonwealth and Development Office</td>
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<td>UK NACE</td>
<td>UK National Authority for Counter Eavesdropping</td>
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<td>DSR</td>
<td>Diplomatic Service Regulations</td>
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<td>HSR</td>
<td>Home Service Regulations</td>
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<td>CIPS</td>
<td>Chartered Institute of Procurement &amp; Supply</td>
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<td>ETI</td>
<td>Ethical Trade Initiative</td>
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<td>ILO</td>
<td>International Labour Organisation</td>
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<td>CCS</td>
<td>Crown Commercial Service</td>
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1 Introduction

This statement covers the activities of FCDO Services (formerly FCO Services) and sets out our actions to understand all potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring that there is no modern slavery in our business and our supply chains. This statement relates to actions and activities during the financial year 1 April 2019 to 31 March 2020.

As part of central government, FCDO Services recognises that it has a responsibility to take a robust approach to modern slavery and is absolutely committed to preventing modern slavery in its corporate activities, and to ensuring that its supply chains are free from modern slavery.

2 Organisational structure and supply chains

We are a Trading Fund of the Foreign, Commonwealth and Development Office (FCDO). We provide a range of integrated, secure services worldwide to the FCDO and other UK government departments, supporting the delivery of government agendas. We also provide services to foreign governments and international organisations closely linked to the UK.

Operating worldwide, our security cleared people design and deliver secure services that meet the demanding needs of our customers in more than 250 diplomatic offices, across 160 countries. These services include protective security, estates and construction, cloud computing, communications and monitoring, logistics, and translation and interpreting. We are also the UK National Authority for Counter Eavesdropping (UK NACE).

Further details can be found here FCDO Services

We predominately use UK based suppliers but also use local organisations. Whenever possible we utilise contracts and framework agreements set up by Crown Commercial Service (CCS); part of the Cabinet Office.

3 Relevant policies

FCDO Services operates the following policies that assist its approach to the identification of modern slavery risks:

- Our Ethical Codes - Our Ethical Codes ensure our people, permanent or contracted, understand and abide by our corporate ethical standards. They must carry out their duties ethically, with integrity and in strict accordance with our code. Our Ethical Codes cover:
  - Code of Conduct
  - Gifts, Hospitality and Conflicts of Interest
  - Working with colleagues
  - Handling information
  - Promote the eradication of unethical practices
• Dignity at Work Policy - Everyone deserves to be treated with dignity and tolerance at work. Our Dignity at Work Policy explains how we ensure our people receive fair treatment and respect, no matter their background and make them able to fulfil their potential and avoid discrimination in the workplace

• Contract Management Best Practice Guidance - This guidance explains how we manage and monitor the service that suppliers provide our organisation. It explains how we manage contracts for the delivery of goods, services and projects

• Use of Agency Workers – FCDO Services uses only specified, reputable employment agencies to source contract labour using a CCS framework agreement where the practices of any new agency has already been verified

4 Risk of slavery

FCDO Services appreciates that there is a risk of modern slavery in all parts of our global business and across our supply chain and take these steps to assess and manage that risk:

• mapping the supply chain broadly to assess particular product or geographical risks of modern slavery;

• evaluating the modern slavery and human trafficking risks of each new supplier;

• provide guidance and training to staff on modern slavery and human trafficking and how to recognise it within our organisation and across our supply chains

5 Staff

Raising a Concern - FCDO Services is committed to ensuring high standards of conduct in all that it does. For civil servants, these standards are reinforced by the Civil Service Code and in Diplomatic Service Regulations (DSR) and Home Service Regulations (HSR). Our Raising a Concern Policy is designed to make it easy for workers to make disclosures, without fear of retaliation.

In 2016 FCDO Services became the first central government organisation to be awarded the Chartered Institute of Procurement and Supply (CIPS) Corporate Ethics Mark. To retain this mark all of our procurement staff annually undertake training in ethical procurement and supply, including combating modern slavery and other human rights abuses and to then complete an examination, gaining a pass mark exceeding 80%.

6 What actions are we taking

To continue our commitment to eradicating modern slavery in our supply chain we:

• Wherever possible use framework agreements set up by the CCS, part of the Cabinet Office, responsible for putting in place legally compliant agreements for commonly used goods and services across government and policing and monitoring these for the
life of the agreements. This ensures that FCDO Services is using agreements that comply with the requirements of the Modern Slavery Act 2015.

- Introduce annual audits to high risk contracts for example on one contract the supplier has been required to submit for review a Sedex Members Ethical Trade Audit report which documents the factories labour and health and safety standards

- Continue to assess all suppliers where appropriate to ascertain the risk of modern slavery and take action where necessary.

- Continue to request, where appropriate, that new suppliers sign and return our Ethics Policy Statement to ensure that they declare that their working practices meet the minimum standards.

- Continue to ensure that our statement is based upon the Ethical Trade Initiative (ETI) Base Code which is founded on the conventions of the International Labour Organisation (ILO) and is an internationally recognised code of labour practice.

- Ensure that for tenders where a modern slavery risk is identified suppliers are required as a minimum to confirm if they are subject to the reporting requirements of The Modern Slavery Act 2015, and where they have complied with them.

- Continue to utilise independent data which reports on supplier’s ethical practices. The result of these reports support in determining if we would engage with or continue trading with suppliers who do not meet our core principles as set out in the Ethics Policy Statement.

- Where appropriate work with colleagues across UK government to identify and eradicate Modern Slavery in the supply chain

- Continue to conduct assessments for all current or new suppliers and relevant markets to identify those which are considered high or medium risk. As a minimum this considers;
  - the location of the supply chain
  - the source of the raw materials
  - if there is any subcontracting in the supply chain
  - where relevant they have published a statement which is complaint with the Modern Slavery Act

7 Board approval

This statement has been approved by FCDO Services' Executive Board of Directors, who will review and update it annually.