

Modern Slavery and Human Trafficking Statement – 2016/17

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by UK Shared Business Services (UK SBS) during 2016/17 to prevent modern slavery and human trafficking in its business and supply chains.

UK SBS is a private company limited by shares but is also classed as a public body and is subject to all applicable UK legislation, required to comply with all relevant Government policies and guidance for public bodies, including *Managing Public Money*. The Company operates solely in the UK and all employees are public servants.

The Company provides services – Human Resources, Payroll, Finance, Information Systems and Services (ISS) and Procurement - to its Shareholders and their partner organisations, all of which are also UK public bodies and contracting authorities. As contracting authorities, all are subject to European public procurement rules and UK Government implementing legislation, namely the Public Contracts Regulations (PCR), associated government policies and guidance.

Policies and Contractual Controls

Government policy includes a requirement on public bodies to use Crown Commercial Service (CCS) frameworks and contracts where it is possible to do so. The Company's Procurement Service leads on procurement through CCS frameworks and undertakes bespoke procurements where the goods or services required by clients cannot be sourced through central arrangements.

In 2016, UK SBS introduced a mandatory requirement for suppliers to declare their compliance with Section 54 of the Modern Slavery Act (if the supplier is within scope of the Act) as part of the procurement process. The terms and conditions for non-purchase order items have been updated to include a specific clause relating to modern slavery, requiring the supplier to provide assurance to the relevant contracting authority to evidence the actions taken to embed respect for human rights and zero tolerance of modern slavery, including stakeholder engagement, training initiatives and assessment of associated risks. UK SBS and CCS terms and conditions also state that all contracts are subject to the laws of England and/or Wales. As a consequence, suppliers are bound to comply with all relevant legislation including the Modern Slavery Act.

Supplier management is in place for strategic suppliers as an integral part of CCS and UK SBS category management. Strategic suppliers are defined as such through a combination of the value, complexity, volume, bespoke nature and impact of the contracts. Supplier management includes active performance and risk management, including risks within the supplier's supply chain. In 2017/18, UK SBS is introducing the use of CAESER, a collection of online assessments which has a specific module / assessment related to modern Slavery. Although this will not be a contractual obligation, under a contract / relationship management approach, suppliers will be expected to complete the modules which will gather in depth information and explore key risk indicators such as country of operation, labour movements and their associated modern slavery policies.

The Company maintains a Code of Conduct and policies on Corporate Social Responsibility, Whistleblowing (published on the website), Procurement, Risk Management and Inclusiveness as part of a wider suite of policies. All of these are easily accessible by all UK SBS employees and are reviewed on at least an annual basis.

Our Supply Chain

The UK SBS supply chain comprises approximately 230 suppliers together providing mainly IT hardware, software and associated support, contingent labour, legal and professional

services, facilities management including office rentals and travel booking services. UK SBS suppliers have been appointed primarily through CCS frameworks. Where the Company, its clients or suppliers develop any concerns relating to modern slavery (or any other matter) for contracts in operation, they are raised with the CCS and/or UK SBS procurement service for investigation and resolution; with contract termination being an option if the particular circumstances warrant such action.

Modern Slavery Training

UK SBS is developing, in conjunction with its Research Council clients, a bespoke training package, primarily aimed at the Procurement and ISS Supplier Integration and Management teams (approx. 100 employees), both of which are directly involved in supply chain management and / or the procurement process; the training is due to be rolled out in summer 2017. An awareness campaign to all UK SBS employees will be run in parallel to increase understanding of modern slavery, identify key indicators of potential modern slavery and highlight where to find further information or to report suspected incidents.

Next Steps

In 2017/18, UK SBS will undertake the following activities and report on them within future modern slavery statements:

- Review relevant internal policies and add additional sections specific to modern slavery where applicable.
- The Government Internal Audit Agency, as part of the 2017/18 audit plan, will undertake a review of the clauses contained within procurement contracts to assess compliance.
- Roll out employee training and awareness and report on completion rates.

This statement was approved by the UK SBS Board on 25 May 2017.



Joanna Brigham
Executive Director

Signed on behalf of the UK SBS Board