

# **Modern Slavery and Human Trafficking Statement**

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 2025 and which further steps are to be taken to address the risk of modern slavery.

This statement is our sixth 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 Corporate Officer of the House of Commons and the Corporate Officer of the House of Lords (acting jointly) are the sole member and guarantor of the Delivery Authority.

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 pursuant to the Parliamentary Buildings (Restoration and Renewal) Act 2019 ("the Act"), as amended and supplemented by the Parliamentary Works Sponsor Body (Abolition) Regulations 2022.

The Delivery Authority reports to Parliament via the Client Team, a joint department of the Houses of Parliament. Further information on this governance structure is available on the <u>R&R website</u>. As of 31 March 2025, the Delivery Authority employs 142 direct employees and has 2 inward secondees. Furthermore, the Delivery Authority has an additional 11 agency workers.

The Delivery Authority contracts with a third party supply chain to undertake much of the work required for the Programme. The Delivery Authority has direct contracts with 139 suppliers, with 137 suppliers based in the UK, one in Ireland and one in Israel. Five suppliers represent approximately 75% of the Delivery Authority's supply chain expenditure. The sub-contracting arrangements of all key contracts are regularly reviewed. As our programme develops and our supplier base grows, 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, but also 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 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; Counter-Fraud, Bribery and Corruption Strategy; Conflict of Interest Policy; Equality, Diversity and Inclusion (EDI) Policy; Skills and Apprenticeships Policy; Social Value Policy; Procurement Policy.

Our employees 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.

Our supply chain partners are expected to maintain equally high standards of behaviour. We ensure that they can do this by confirming they have a suitable Slavery and Human Trafficking Statement in place and, with high-risk contracts, reviewing their application of it on a regular basis.

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.

The Delivery Authority has aligned its processes with <u>PPN 009: Tackling modern slavery in</u> government supply chains.

#### Governance

Legal compliance reporting is an established part of 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 is monitored by the Risk Audit and Assurance Committee, who report to the board of directors of the Delivery Authority.

### Training and Measuring Effectiveness

The Delivery Authority's eLearning module on Modern Slavery, which launched in June 2022, is mandatory for all staff within thirty days of joining. The learning outcomes ensure our staff:

• understand what we mean when we talk about 'modern slavery';

• recognise the indicators and understand how to report any suspicions or instances of forced labour or exploitation anywhere in our supply chain;



HOUSES OF PARLIAMENT

• are aware of the proactive steps the Delivery Authority is taking to tackle the problem of modern slavery in supply chains.

Bespoke training is also delivered annually to the Commercial team which is responsible for all procurement and contract management activity on behalf of the Delivery Authority.

## Key Performance Indicators (KPIs) and Effectiveness

The KPIs we use to track our progress are as follows:

Key Performance Indicator	2024-25	Note
1. Mandatory modern slavery awareness training completed by all staff within 30 days of joining.	•	100% completion rate as of 31 March 2025.
2. Commercial policies and processes remain aligned to legislation and policy notes.	•	Fully aligned as of 31 March 2025.
3. Reported instances of modern slavery within the Delivery Authority's supply chain investigated and resolved.	•	No such issues reported as of 31 March 2025.
4. All procurement exercises to have a modern slavery risk assessment carried out at Procurement Initiation Document stage, in line with the DA's Modern Slavery Risk Assessment Procedure.	•	All required assessments carried out as of 31 March 2025.
5. DA Commercial staff to receive bespoke modern slavery training on an annual basis.	•	Delayed to 2025-26 due to an expected PPN 009 update relating to risk prioritisation which has not yet been published. Modern slavery risk continues to be assessed as required for all procurements, highlighted at team meetings as appropriate, and monitored on an ongoing basis by the Head of Procurement Processes & Assurance.

Progress Key: • - Inadequate • - Progressing • - Good



### Goals and outcomes

The following is a summary of the main modern slavery related activity (and outcomes) planned and undertaken by the Delivery Authority in the 2024-25 financial year:

2024-25 Activity	Outcome
1. Embed our modern slavery processes within the updated Delivery Authority Procurement Code which reflects all the procurement law changes that flow from the implementation of the Procurement Act 2023.	The Procurement Act 2023 implementation was delayed by the Cabinet Office, with a knock-on delay to the Delivery Authority Procurement Code update. This is now planned for completion by 30 June 2025.
2. Set the modern slavery requirements for our future strategic partners contracts.	The Delivery Authority continues to develop the requirements for its future strategic partners contracts.
3. Continue to build capability and awareness of modern slavery across the organisation.	The risk of modern slavery has been highlighted by the Head of Procurement Processes & Assurance regularly in team meetings with the Procurement team. Organisation wide awareness will be refreshed via briefings and training which will take place once the Procurement Code update is completed.

Over the next financial year (2025-26) we will:

- embed our modern slavery processes within the updated Delivery Authority Procurement Code;
- review the mandatory modern slavery awareness training;
- set the modern slavery requirements for our future <u>strategic partners</u> contracts.

We remain conscious of the need to inform ourselves of best practice in tackling Modern Slavery. Our policies and processes are continuously benchmarked against latest best practice as published by the Home Office and relevant Procurement Policy Notes as published by the Cabinet Office.

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 Delivery Authority on 23 June 2025.

Russ MacMillan Chief Executive, Restoration & Renewal Delivery Authority 24 June 2025