

Guidance for Mitie Suppliers on Modern Slavery and Human Trafficking

January 2020

According to www.legislation.gov.uk, the Modern Slavery Act 2015 (MSA) is 'An Act to make provision about slavery, servitude and forced or compulsory labour and about human trafficking, including provision for the protection of victims; to make provision for an Independent Anti-slavery Commissioner; and for connected purposes.'

Mitie welcomed the introduction of the MSA and the provisions within Section 54 covering supply chain transparency in the Home Office guide at the time. We will not tolerate human trafficking, slavery or forced labour of any type. The Mitie Group 'Slavery and human trafficking statement 2019', available at www.mitie.com, explains that we enforce our policies and procedures in an effort to ensure that slavery and human trafficking is not taking place anywhere in our supply chain.

We actively engage with suppliers to ensure that they share our values and comply with relevant legislation and below explain more about what that means in practical terms.

This document updates previous guidance for suppliers on how to support the aims of Mitie and its clients in this important area, as well as to explain what practical steps are in place.

Background and Previous Actions

Mitie Approach and Expectations of Suppliers

We aim to work with our supply chain partners to achieve our MSA aims, meaning that suppliers are expected to show us what steps they take to ensure that:

- modern slavery is not present in their company
- safe and fair working conditions are provided
- risks within their own supply chain are understood
- zero tolerance, responsible management and compliance with all legal requirements is reflected in their policies, procedures, practices and in any contracts with lower tier suppliers.

The Mitie supplier Onboarding process includes standard due diligence checks to assess the suitability of suppliers to provide goods and services against required standards. This process captures confirmation that suppliers are committed to ensuring that slavery and human trafficking is not taking place within their own supply chain.

The Procurement team has carried out desktop audits to provide assurance that suppliers are responsible partners in our service delivery. 50 tier one suppliers are selected annually for assessment and if the outcome identifies any weaknesses in governance, we seek to agree a detailed plan of action with the supplier to remedy the deficiencies. Failure by a supplier to respond to the questionnaire or to provide assurances that it has satisfactorily assessed its own risk of modern slavery, may lead us to review our business relationship.

The Mitie Procurement team has recently grown considerably in size, so further MSA awareness training will be carried out via our internal 'Anti-Slavery e-learning module', to be completed by November 2019. This will also be extended to Mitie staff that manage key supplier contracts and we are looking at ways to make this, or something similar, available to our suppliers too.

For new suppliers, we typically ask during the Tendering or subsequent Onboarding process about their policies on labour standards, including modern slavery and human trafficking, and how that is communicated within their organisation and supply chain. As appropriate, we also explore whether they have carried out MSA risk assessments, provided training for staff and checked how employees or suppliers can raise potential MSA concerns.

Planned Actions to Improve Supply Chain Awareness

New Supplier Social Value Policy

This document has been written to supersede the Supplier Code of Conduct policy and now includes requirement for Social Value and Sustainable Procurement. It will be published by end November 2019 and available on the Mitie supplier pages at: <https://www.mitie.com/suppliers/>

Focus on high risk categories of spend

Government work on MSA has identified industries with high risk supply chains, including: Construction; Recruitment and Labour; Hospitality; Food.

Classification of our supplier spend by category is standard practice at Mitie, so categories that relate to these types of industries will require suppliers bidding for work to assure us that they have adequate measures in place, which may be over and above the standard checks made.

Reporting Concerns

Mitie do not expect supplier staff to put themselves at any risk by raising concerns. MSA violations are serious and organised criminal gangs may be responsible, so we would encourage all staff who suspect any violation to call the confidential national helpline or report online at:

 **08000 121 700**

<https://www.modernslaveryhelpline.org/>

In that way staff are protected from any potential personal risk, which may be an issue if raising concerns directly to those supervising suspected victims.

Internally, Mitie staff report concerns through the confidential Whistleblowing Line. Under circumstances where an investigation is required, we may require suppliers to suspend work until they can assure us that there are no risks, or that changes have been made to address any concerns.

We also expect suppliers to act upon any information they have identified through their own MSA checks and immediately communicate to us where incidences of modern slavery have been found within a Mitie supply chain, by reporting that to the Head of Procurement Process.

Onboarding System Changes

Improvements to the process used when suppliers are first set up are underway, with a new system to be implemented early in 2020. The principles applied build on the previous approach, so MSA statements will continue to be required along with acceptance of the Supplier Social Value Policy.

Suppliers that do not accept these clauses will not be permitted to be set up as a Mitie supplier and the system will also checks ongoing compliance for longstanding suppliers.

Supplier Management Framework (SMF)

As part of its Procurement Transformation Programme, Mitie has launched SMF to manage the performance of its key suppliers. Up to 120 suppliers will be inducted into the programme by the end of 2021 and one of the topics in major review meetings will include discussion of MSA-related risks and social, ethical and sustainable issues.

Through the SMF group, we will be looking for evidence of more detail about steps taken by our key suppliers on MSA, whether in awareness training, audit activity or in updating and communicating policies.

Other Initiatives

Mitie Procurement will investigate MSA approaches in the FM sector, both clients and the supply chain, to review and develop our approach to managing MSA risk and apply best practice techniques going forward.

Support for our Suppliers

In addition to our SMF meetings, Mitie held an inaugural Supplier Day in February 2019 at its headquarters in the Shard, London, attended by around 90 of our most important supply partners. This will be an annual event and at the next one there will be a focussed session to highlight expectations around MSA, Social Value and Sustainable Procurement to increase awareness.

To further help our suppliers, below are links to some recent Publications that give further insight into these issues. We encourage all suppliers to investigate these and other resources designed to help organisations develop practical approaches to addressing MSA.

For example:

Government Factsheets about Industry sectors with known raised MSA risks can be found at:
<https://www.gov.uk/government/publications/modern-slavery-industry-factsheets>

A comprehensive set of practical guidance is also available at:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/649906/Transparency_in_Supply_Chains_A_Practical_Guide_2017.pdf

Other practical guidance from stronger2gether is available, providing toolkits:
<https://www.stronger2gether.org/resources>