

PERMANENT SECRETARY

D/PUS/6/1 (48)

28 March 2022

Dame Sara Thornton

Independent Anti-Slavery Commissioner's Office

Sent electronically

Dear Sara,

MOD PUBLIC PROCUREMENT AND MODERN SLAVERY

Thank you for your letter dated 22 November outlining your role as Independent Anti-Slavery Commissioner, and for bringing to my attention the list of companies producing, handling or supplying goods that are subject to Withhold Release Orders (WROs). I apologise for the excessive delay in replying.

The UK has been at the forefront of international efforts to eradicate modern slavery and, as you will be aware, for the first time ever, UK ministerial government departments, including the Ministry of Defence, have voluntarily published their first annual modern slavery statements setting out how they are preventing modern slavery in their operations and supply chains.

The MOD's statement builds on the UK government modern slavery statement, published in 2020, and provides more granular detail about the actions we have already implemented, our future plans and our continuous commitment to tackling modern slavery in our supply chains. As a first step all of our 19 Strategic Suppliers have completed the Modern Slavery Assessment Tool (MSAT) which helps strengthen suppliers' modern slavery due diligence. The results of the MSAT, which they have shared with us, will now be used as a basis for discussions with our suppliers and highlight areas of improvement for us to drive forward. For lower value contracts we have produced a bespoke one-page risk assessment tool to help our procurement staff evaluate, in a proportionate manner, the risk of modern slavery within supply chains, with the option to take further action with MSAT if necessary.

I would also highlight my Department's 'Hearts and Minds' campaign which is aimed to raise awareness of modern slavery among procurement staff and make them aware of their responsibility to prevent modern slavery in Government supply chains. This campaign has not only reached a large internal audience, but our messaging has since been shared more widely with other government departments.

Turning to your point concerning organisations that are subject to Withhold Release

Orders, the evidence the US government uses to issue WROs related to forced labour is not shared with the UK. The WROs issued by the US government are made under a different legal framework, governing law and jurisdiction and therefore do not apply in the UK. That said, we appreciate that the US' Withhold Release Orders and Findings List does indicate modern slavery risks may be present in companies named in that list. The Home Office and Cabinet Office provide Departments with guidance and tools to support us in conducting modern slavery due diligence and will refer to the list in future guidance as a data source to inform modern slavery risk assessments of contracts. In the meantime, I can confirm that the MOD does not hold direct contracts with any of the organisations named in the list that you provided.

As a Department, the MOD will continue to support both our procurement staff and our suppliers through the process of identifying and eliminating modern slavery from our supply chains. Whilst this is a huge challenge requiring sustained effort over time, we remain steadfast in playing our part in ensuring the Government's modern slavery objectives are achieved.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'D Williams', with a horizontal line underneath.

DAVID WILLIAMS