

CCS Modern Slavery webinar 7 October 2020 questions and answers	
Question	Answers
What agreements are Modern Slavery Assessment Tool (MSAT) run on?	Initially, CCS ran MSAT campaign on all high/medium risk frameworks, those contracts can be found here: https://www.crowncommercial.gov.uk/news/tackling-modern-slavery-what-ccs-is-doing Ongoing, CCS category teams determine the need for MSAT campaigns, post award, based on a standard process within the organisation. This includes a review of the risks of labour abuse in the early stages of developing their procurement business cases.
Who do I contact if I want to run a MSAT campaign?	You should first register as a Buyer for the Modern Slavery Assessment Tool (MSAT) - https://supplierregistration.cabinetoffice.gov.uk/msat - on the Supplier Registration Service: https://supplierregistration.cabinetoffice.gov.uk/
Are you able to share the additional SQ questions?	CCS has used the Standard Selection Questionnaire, which was published by Cabinet Office in September 2016, since 2016 in all of its procurements. The Procurement Policy Note (PPN), which includes the Selection Questionnaire (SQ) template can be downloaded from GOV.UK . The SQ PPN can be found at: https://www.gov.uk/government/publications/procurement-policy-note-816-standard-selection-questionnaire-sq-template
Are the results of CCS campaigns available to customers?	As the information provided within the MSAT tool and its recommendations are essentially sensitive documents, it is reasonable that the suppliers retain control over who these are shared with. Suppliers can share their MSAT assessments with customers, provided that they have registered as buyers on MSAT (see Row 5). However, customers will need to invite those suppliers to their own campaign. If a supplier has already completed an MSAT assessment for CCS, then they will be able to share that assessment with the customer.
Can you see the MSAT results by supplier?	The MSAT dashboard can be organised by supplier. After running your own campaign, you will be able to see all of those suppliers who have completed an assessment for you. The MSAT tool also has a search function which you can use to see an individual supplier's assessment.
What audits, particularly international, are CCS undertaking and what recommendations would you make to individual organisations?	CCS has worked with other government departments and civil society to develop the MSAT tool and run an initial series of campaigns. We recommend that public bodies should use this as their main audit tool, as it generates recommendations based on the specific supplier's information.
Is there funding for Modern Slavery audits?	THE MSAT tool is funded by Home Office and CCS. The Modern Slavery Unit in the Home Office will be able to advise if any funding for other audit tools is available.
Legal blogs suggest a commercial organisation over the £36 million threshold can compliantly submit a statement to the effect that they do nothing and plan to do nothing in relation to modern slavery. How do you engage with a supplier taking this approach given that (legally) they have met their obligations by publishing a statement (although inadequate)	The general enforcement of the requirement is matter for the Home Office. though we would generally encourage contract managers to aim for constructive conversations with a supplier about the content within the statement. A public procurement agency would have the option of requiring any bidder to publish a modern slavery statement which is compatible with guidance provided on the relevant pages - https://www.gov.uk/government/publications/transparency-in-supply-chains-a-practical-guide . A procurement authority may word its requirement such that it can deem a statement to be unsatisfactory in the course of an evaluation and selection process. If an existing contractor is deemed to be uncooperative and unreasonable, a public body would need to seek advice on what remedial action it can take.
Has any assessment been done on the supply chain of PPE during COVID - China and Malaysia high risk of labour exploitation?	Where we have existing frameworks that offer PPE, these have been risk assessed already and the suppliers working under these contracts have been invited to complete MSAT. Category managers are currently reviewing their supplier risk returns and scores and agreeing / ensuring that they put in place risk mitigation plans to tackle any identified and known risks. Where individual contracts were awarded as part of the COVID-19 response, due diligence will have been undertaken.
Where can I obtain MSAT?	Customers wishing to access MSAT will need to register as buyers via the Supplier Registration Service platform, which can be found at: https://supplierregistration.cabinetoffice.gov.uk/ MSAT has been developed by NQC in partnership with the Home Office who are the Government Departmental lead for Modern Slavery.
Where can we access a list of all sectors identified to be at risk by the Home Office?	This is listed in the Tackling Modern Slavery Guidance: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/830150/September_2019_Modern_Slavery_Guidance.pdf

Can you supply MSAT reports for suppliers that we have call off with from CCS frameworks	As the information provided within the MSAT tool and its recommendations are essentially sensitive documents, it is reasonable that the suppliers retain control over who these are shared with. You can request them from individual suppliers yourself, by registering on Supplier Registration Service and accessing MSAT (see Row 5), then asking the suppliers to send their MSAT reports to you.
Is it a requirement for Government Departments to issue a Modern Slavery Statement?	Not currently, though Home Office have recently published the Government's response to the transparency in supply chains consultation: https://www.gov.uk/government/consultations/transparency-in-supply-chains , which includes a proposal to extend the transparency reporting requirement in the Modern Slavery Act to public bodies which means that this is will be required within the year for departments over the £36m threshold
Will CCS be publishing supplier Modern Slavery statements and results of the MSAT on the website for buyers?	No, we don't plan on making these publicly available. Where suppliers are required to publish Transparency in Supply Chains statements, these should be on the suppliers' individual websites. As the information provided within the MSAT tool and its recommendations are essentially sensitive documents, it is reasonable that the suppliers retain control over who these are shared with. If a buyer wishes to see a supplier's MSAT result, they can register on the Supplier Registration Service tool and request the supplier to share their MSAT results on the portal.
What are the consequences for the 26% of suppliers who did not complete the survey?	The main MSAT campaign that you're referring to was voluntary, so there are no formal consequences for not completing it. Agreement managers are following up with the individual suppliers to understand why they haven't completed the survey - some feedback we've had is that the supplier is a small organisation with few staff and the question set is quite intensive so it's a daunting task. For new agreements where this has been built into the agreement T&Cs, there may be consequences built in for failure to meet SLA/KPIs - but we are trying to gently encourage rather than punish suppliers as we need to be working together on it to have a positive effect.
Can we presume we shouldn't ask a CCS framework supplier to undertake a MSAT because this would have been picked up by CCS?	Whether or not CCS has carried out an MSAT campaign with a particular supplier depends on whether CCS' risk assessment has determined that the framework contract in question is high risk. If it is a high or medium risk contract then we will have invited the suppliers working under these contracts to complete an assessment post contract award. If you're in any doubt, you can contact the specific category team to confirm whether a risk assessment or MSAT campaign was carried out. If you do ask a supplier, and they have already done the MSAT exercise for CCS, they can share the results with you in the tool, so it doesn't create extra work for the supplier and allows you to undertake your own due diligence.
What should we do if we find a problem with a specific CCS framework supplier?	If the supplier in question is working under a CCS framework contract that has been identified as high or medium risk, then we will invite the suppliers working under that contract to complete an MSAT assessment to determine whether they have sufficiently robust processes in place to identify and manage Modern Slavery risk. After carrying out a MSAT campaign, our Category teams will carry out an analysis and review of suppliers' risk scores to see which suppliers they will need to invite to a review meeting and agree / put in place a continuous improvement plan to mitigate any identified risks that MSAT may have uncovered, so we will be working with those suppliers manage those identified risks. If the supplier is working under a low risk contract, then you should alert that Category team to the issue via our Service Desk helpline. You can also report any instance of Modern Slavery to the Modern Slavery Helpline on 0800 012 1700.
How can we get hold of the MSAT framework?	Customers wishing to access MSAT will need to register as buyers via the Supplier Registration Service platform, which can be found at: https://supplierregistration.cabinetoffice.gov.uk/ . You can also download the full set of questions asked on MSAT from this link.
How do you register for these Home Office alerts?	Public sector organisations wishing to receive relevant intelligence relating to their business operations should contact the Home Office Modern Slavery Unit directly.
Is there a global common understanding of modern slavery?	A definition of forced labour is given by the International Labour Organisation: https://www.ilo.org/global/topics/forced-labour/definition/lang--en/index.htm . Anti Slavery International define modern slavery as 'the severe exploitation of other people for personal or commercial gain': https://www.antislavery.org/slavery-today/modern-slavery/
Will new requirements apply to charities that are funded by government?	If providing good, service or works under a contract as a supplier, this will apply.
How are CCS planning to engage with the new mandatory reporting that the Government are introducing in the next few months?	We are in regular contact with the Home Office Modern Slavery Unit, and are awaiting the introduction of the guidance to understand how we will implement any mandatory reporting.

We are about to undertake a Modern Slavery Risk Assessment of our supply chain. You mentioned the Global Index. Are there other accessible sources of information we can consider to guide our review? We are a fairly small org and do not have category leads

You should use the 'Tackling Modern Slavery' guidance: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/830150/September_2019_Modern_Slavery_Guidance.pdf