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Metropolitan Police Service (MPS)
Slavery and Human Trafficking
Statement 2025-2026

Period covered by this statement

The MPS financial year-end occurs on 31 March. This statement covers the financial year 1 April 2025–31 March 2026.

Introduction

This statement articulates the commitment and intended actions of the Commissioner of Police of the Metropolis to address Modern Slavery through our business activities and supply chains. This statement is made in accordance with Section 54(1) of the Modern Slavery Act 2015. When considering Modern Slavery and human trafficking, we are responsible for tackling those crimes, bringing offenders to justice, and safeguarding those at risk.

The UK's enactment of the Modern Slavery Act 2015 represented a pioneering step in transforming the UK's response to the exploitation of the most vulnerable and at-risk people. The Modern Slavery Act 2015 was the first legislation of its kind in the world and now more victims than ever are being identified and supported; more offenders are being prosecuted; and thousands of companies are publishing their commitment to tackling Modern Slavery in their supply chains.
Someone is in slavery if they are:

- Forced to work through mental or physical threat
- Owned or controlled by an 'employer', usually through mental or physical abuse or the threat of abuse
- Dehumanised, treated as a commodity or bought and sold as 'property'
- Physically constrained or have restrictions placed on their freedoms

We are committed to working in partnership with our suppliers to support and challenge them on their response to Modern Slavery, and we will ensure our progress is open and transparent, reporting where we have been successful and where we still have opportunities to improve.

This statement sets out the steps that we are taking to prevent modern slavery, human trafficking, forced and bonded labour and labour rights violations within the MPS and in our supply chain by informing suppliers, staff and the public about the MPS' policy concerning modern slavery and supply chains. It includes the steps we will take to prevent and mitigate relevant risks going forward.

1. Our Organisation and Supply Chains

The MPS is made up of more than 43,000 officers and staff, plus thousands of volunteers; we are one of the largest employers in London and the South East of England. The territory we serve covers 620 square miles and is home to over 8.6 million people. The MPS is the UK's largest police service and has 25% of the total police budget for England and Wales.

The MPS spends about £1 billion each year on a diverse range of goods and services, and we aim to procure them in the most cost-effective and compliant way, while satisfying often-urgent operational needs. We proactively manage our large complex and operationally critical outsourced service contracts, to ensure that we receive the quality services we are paying for and achieve value for money through the entire life of the contract.

2. MPS' Operational Role in Tackling Modern Slavery

Over the past few years, modern slavery offences have increased, and it is important that officers have the right skills to investigate these often-complex cases, improve the quality of victim care and increase their engagement in the criminal justice process. Accountable to the Mayor and the Home Secretary, over the coming year in line with our previous statement we will:

- Continue to deliver a Modern Slavery and Organised Immigration Crime Investigators course for the Specialist Crime, Complex Case and Exploitation, Modern Slavery team, BCU officers, the wider MPS family and key partners. This will assist identification of Modern Slavery offences, ensure safeguarding of vulnerable persons and enforce and disrupt this crime type.
- Continue regular engagement with the Crown Prosecution Service (CPS) to improve prosecutions and the securing of civil orders under Modern Slavery Legislation.
- Continue to lead a strategic Modern Slavery Network in partnership with National Crime Agency (NCA), Border Force, Immigration Enforcement, Greater London Authority (GLA), CPS and NCA to ensure intelligence and investigative opportunities are maximised with a commitment to joint working.
- Work with Victim Navigators through Justice and Care to better support victim engagement, safeguarding and more cases being successfully prosecuted.
- Work to improve the financial investigative capability applied to Modern Slavery investigations, applying for further training opportunities for our staff and increasing officer awareness of financial investigation tactics to support disruption and prosecution outcomes.
- Work closely with international partners through the Foreign Law Enforcement Community (FLEC) Network.
- Continue to engage with overseas law enforcement agencies and partners to support intelligence sharing and joint operational activity against transnational criminality that threatens or impacts London.
- Continue to deliver Operation Seascale and Operation Enterprise to enhance collaboration with partners from the private sector, law enforcement and other Government agencies.
- Improve triage processes which will ensure that we maximise investigative opportunities and ensure Serious and Organised Crime (SOC) level investigations are supported by the Investigation teams.
- Support a Modern Slavery Tactical Policy Advisor (TPA) to help drive performance across the MPS, bridge the gap between BCU's and Specialist Crime and keep informed of national and international policy and procedures as demands and priorities change.
- Chair a bi-monthly Modern Slavery Single Point of Contact meeting represented by Basic Command Units and Specialist Crime to support the MPS' response to this crime type both operationally and strategically.
- Continue to play an active part in forums and taskforces such as the Joint Money Laundering Intelligence Taskforce (JMLIT) which seeks to take Modern Slavery through financial intelligence and development.
- To respond to the emerging threat of Organised Immigration Crime, identify links to Modern Slavery and use a collaborative approach with partners both inside and outside of policing to address this threat.
- To ensure collaboration with foreign law enforcement using embedded officers from other nationalities into the MPS.

In addition to the above, the MPS has a Modern Slavery regional coordinator that is shared with BTP and City of London Police. This role will continue to forge better working practices across

traditional police boundaries.
In terms of our operational activity:

- We have improved access to support that frontline officers and local investigators receive from our dedicated specialist units, ensuring that the appropriate expertise in responding to modern slavery is applied to all investigations and enquires.
- We are improving the ability of officers to identify relevant vulnerabilities with victims of criminal exploitation by training officers in collaboration with the Children's Society around issues such as Adultification.

Given the role of the MPS in fighting against Modern Slavery, as described above, it is obviously important for the MPS to do all it can to stop it from occurring in its supply chain.

3. Policies in Relation to Slavery and Human Trafficking in the Supply Chain

The MPS, through the Mayor's Office for Policing and Crime (MOPAC), is a functional body of the Greater London Authority led by the Mayor of London and is therefore required to align and contribute to Mayoral policy and strategy.

The MPS is a signatory of, and conducts its business in accordance with, the GLA Group Responsible Procurement and Social Value Policy[1] and GLA Group Responsible Procurement Delivery Plan[2], a high-level strategic document setting out the GLA Group's plans, ambitions and commitments within procurement activities. It reflects best practice and demonstrates that the MPS commercial activities meet all legislative requirements, including those enshrined in the Modern Slavery Act 2015.

The MPS, through its commitment to the GLA Group Responsible Procurement and Social Value Policy, is committed to the promotion of ethical sourcing by:

- Adopting the provisions of the Ethical Trading Initiative (ETI) Base Code[3], as the standard we expect of our suppliers to support working conditions that are legal, fair and safe. Greater emphasis on ETI has been focused on the Social Value questions within tenders e.g. suppliers outlining how they advocate these initiatives including that employment is freely chosen, working conditions are safe and hygienic and no harsh or inhumane treatment is allowed.
- Identifying contracts and areas of spend where there may be a high risk of poor working conditions, human rights abuses or negative impacts on security and crime. We will be working with Commercial leads on contracts identified that suppliers have safeguards and practices in place to ensure that these risks are addressed by the business and throughout their supply chains. Seeking to improve transparency within the supply chain and working with suppliers to improve any poor performance identified as part of a process of continuous improvement, reflecting existing and emerging legislation and guidance. We will follow up with those suppliers who have completed the Government's Modern Slavery Assessment Tool (MSAT) whose results are below 70% to improve their assessment.

The MPS also aligns with the guidance published within the Government Procurement Policy Notice 009/25: Tackling Modern Slavery in Government Supply Chains updated in February

[1] https://www.london.gov.uk/rp-policy

[2] https://www.london.gov.uk/media/109650/download?attachment

[3] https://www.ethicaltrade.org/eti-base-code

2025.

4. Risk Assessment and Management

The highest risks of people falling victim to modern slavery in our UK-based supply chain include construction workers and those undertaking service contracts in sectors such as cleaning, catering and security, where low pay, migrant labour and/or indirect labour are prevalent.

The highest risks of poor working conditions and human rights abuses from our global supply chain are associated with the production and manufacture of electronic equipment, textiles and construction materials. The mining and extraction of conflict minerals such as copper, lithium, nickel and cadmium, used in the production of batteries for electric vehicles are also of increasing concern.

As with our previous statements, the MPS recognises the corresponding source countries and associated sector risks in its supply chains for these categories, these continue to be as follows:

Category	Country	Identified Sector Risks
Construction	United Kingdom	Multi-tiered supply chains involving use of labour agencies which could result in poor labour practices due to lack of transparency. Unethical practices may include workers being charged unlawful or excessive recruitment fees, workers being misinformed about terms of employment, and the withholding of passports.
Facilities Management: cleaning & catering services	United Kingdom	Low skilled labour; migrant labour; agency labour leading to lack of transparency on employment practices.
Electronic Equipment	Examples include China, India, Mexico	Labour intensive, often low-skilled work; mining of raw materials in high-risk countries for example batteries. Poor labour practices may include underpayment of wages, delayed payment or wage deductions; physical abuse; working excessive overtime; worker's visa or permit is tied to a single employer, and financial penalties for early contract termination.
Uniforms and Work wear	Examples include Bangladesh, China, India, Pakistan, Sri Lanka and Morocco	Risks may include gender inequality; weak protection of workers' rights; poor labour practices including excessive overtime, underpayment or deduction of wages, financial penalties for leaving employer and structural integrity of factories.

Steel and steel components	China, Europe, Japan, India, USA	Country of production where labour rights might not be well protected; low-skilled labour, and dirty, dangerous, or difficult work in mines and smelting plants leading to poor labour conditions.
Stone	Brazil, China, Europe, India, USA	Country of production - US State Department of Labour highlights multiple countries where child and forced labour exists in quarries, child labour and unsafe working conditions.
Batteries	Cobalt – Examples include Democratic Republic of Congo (DRC); Lithium - Australia, Chile, China; Nickel – Canada, Indonesia, Philippines and Copper – Chile.	Sourcing of cobalt presents significant risk of exposure to human rights abuses in the supply chain. Political instability or conflict particularly in the DRC; weak protection of civil liberties and workers' rights; safe and healthy working conditions in mines can be poorly regulated and protected.
Personal Protective Equipment (PPE)	China	Similar risks to those for uniforms and work wear, compounded by the rapid increase in global demand from coronavirus resulting in pressure on manufacturers to produce large quantities in short timeframes.
Waste Collection	United Kingdom	High risk of modern slavery, with two thirds of modern slavery victims in the UK working in the waste industry. Low paid, often migrant labour; prevalence of subcontracting and agency work leading to lack of transparency on employment practices. High profile cases in the press against waste suppliers operating in the UK.
Solar Panels	China	Reliance on manufacturing in China, with well documented state-sponsored forced labour practices, especially in the Xinjiang region affecting the Uyghur population.

The MPS is committed to ensuring the highest ethical standards and practices, including safe working conditions and the protection of workers' rights, across its business and expects its suppliers to demonstrate the same commitment.

The MPS Commercial Services function is leading the MPS implementation of the Responsible Procurement policy and is supported by the GLA Group's Central Responsible Procurement Team which has a remit to support the GLA Group functional bodies in delivery responsible procurement activities.

The Commissioner of Police of the Metropolis is committed to ensuring contracts are compliant

with the Modern Slavery Act 2015. Commercial organisations with a turnover in excess of £36 million are required to give a Statement on Slavery and Human Trafficking in their supply chain. All suppliers must provide annual updates on their Slavery and Human Trafficking statement, if the supplier has a turnover in excess of £36 million.

5. Due Diligence

Since we first published our Modern Slavery statement in 2022/2023, we have made progress on the areas below. This includes our commitments following the formation of the GLA Modern Slavery Delivery Group, for example continuing with our Government's Modern Slavery Assessment Tool (MSAT) campaign. The MPS has also participated with other GLA functional bodies in the London Responsible Procurement Network presentations on Ethical Sourcing.

The MPS continues to ensure all relevant procurements, include a question at supplier selection stage on compliance to Section 54 of the Modern Slavery Act 2015.

Our Supplier Code of Conduct[4] is published on the MPS website. This aligns with the Government Commercial Agency (GCA - formerly the Government Commercial Function) and seeks to ensure that suppliers carry out their operations to the highest standards and will be communicated to our supply base. This includes their obligations to the Modern Slavery Act and Ethical Sourcing.

In all tenders, we now require bidders to agree to commit to undertaking due diligence in their supply chain to identify and manage the risks of modern slavery. We have updated our tender documentation to ask potential suppliers to join Electronics Watch[5] (EW) (where applicable) and to comply with the Ethical Trading Initiative Base Code. The MPS is committed to understanding its supply chains better and working towards greater transparency and responsibility for people working within them. We will continue to work with our suppliers and partners to manage areas of risk and strategies that ensure human rights across the supply chain.

Of the Strategic and Category 2 suppliers asked to complete MSAT, 12 out of the 17 (70%) suppliers who have responded scored 70% plus. Those suppliers with scores over 70% are considered to have appropriate measures in place. We continue to work with those suppliers with scores less than that, working with them to put an action plan in place to improve their policies and due diligence. To note that not all Strategic and Category 2 suppliers will need to complete it, as they won't have a high risk of Modern Slavery. We will be completing a re-segmentation of our suppliers within 2025/2026.

MPS Commercial Services have introduced extra risk management processes and due diligence, which in turn promotes early identification of potential modern slavery risks. Supply chain risks are recorded on a Commercial Risk Register which is reviewed monthly by senior leadership. Any risks deemed high risk are escalated for discussion at a newly formed Commercial Management Risk Committee (CMRC), which includes mitigating actions. Alongside this, a Commercial Assurance Risk Framework (CARF) was launched which is completed for MPS critical contracts. The MPS is committed to understanding its supply chains better and working towards greater transparency and responsibility for people working within them. We will continue to work with

[4] https://www.met.police.uk/SysSiteAssets/foi-media/metropolitan-police/lists_and_registers/corporate/mps-supplier-code-of-conduct-april2023.pdf

[5] http://electronicswatch.org/en

our suppliers and partners to manage areas of risk and strategies that ensure human rights across the supply chain.

6. Training and Awareness Raising

We maintain our commitment to raising awareness of modern slavery risks to Commercial Staff and our Suppliers.

We continue to ensure that everyone involved in commercial activities undertakes ethical and responsible procurement training, and as with the previous year 100% of commercial staff have completed the Government Commercial Function (GCF) training on Modern Slavery in the Supply Chain. New starters in the department are also required to complete the training.

Since 2024/2025, we have ensured that all staff within Commercial Services will undertake the Chartered Institute of Procurement and Supply (CIPS) Ethics Test as well as any further training identified in this area rolled out across Commercial Services.

7. Key Performance Indicators to Measure Effectiveness

The MPS will measure its performance as follows:

- In collaboration with other functional bodies through the GLA Modern Slavery Delivery Group, we will be initially focusing on the Modern Slavery Commitments within the new GLA Responsible Procurement Delivery Plan. There will be a high focus to identify types of contracts where there is a high risk of poor working conditions, human rights abuses or negative impacts on security and crime. MPS contracts identified will have been documented and the steps taken with our suppliers to minimise the risks will have been evidenced. Functional bodies will share good practices, barriers and outcomes on supplier engagements, for example MSAT compliance.

- 100% of staff joining Commercial will have completed the Government Commercial College training on Modern Slavery in the Supply Chain.

- In 2026-2027 we will continue, through Contract Management, to ensure that we continue to target our suppliers, where there is a high risk of modern slavery across the supply network, to complete MSAT.

- The MPS is committed to dealing with instances where Modern Slavery is alleged and / or encountered and will naturally fully investigate circumstances if apparent working closely with those individuals affected, contractors and our police teams if necessary.

- We will continue to provide a greater awareness to both our suppliers and commercial staff of modern slavery risks in the supply chain. This will be achieved through resources such as any training or initiatives developed at the GLA Modern Slavery Delivery Group. This will include informing suppliers of the importance of completing MSAT.

8. Action Plan for 2026/2027

This year we will continue to ensure that ethical sourcing and modern slavery risks are assessed at the tender stage of all contracts, especially those within significant or high-risk sectors, particularly construction, electronics and uniforms. We will:

- Under the new Procurement Act, we will implement Procurement Policy Note 009, Tackling Modern Slavery in Government Supply Chains updates and recommendations within our tender documentation and contract terms and conditions in collaboration with our legal team currently reviewing our contract terms.
- We will continue to work alongside the other GLA Group functional bodies through the GLA Modern Slavery Group to improve how we assess supply chain compliance to Section 54 of the Modern Slavery Act 2015 (as well as other social and economic policy measures). In 2026/2027 we will be re-segmenting our suppliers. This may mean engaging with some newly segmented suppliers, which may see our compliance rates alter. We will continue to engage all Strategic and Category 2 suppliers regarding this request and continue to seek to improve their performance against Section 54. With the implementation of our Contract Life Management (CLM) system and tender documentation, we will continue to ask all our suppliers to confirm that they will produce an annual Modern Slavery Statement. The MPS will continue to monitor our suppliers' compliance with this.
- We will continue to work closely with our construction and facilities management team, seeking assurances that MPS Construction projects and facilities management contracts are aware of and working to reduce the risk of modern slavery activities within these areas. We are reviewing and refreshing our construction and facilities management contracts and contacts to ensure that they are current and up to date.
- We will continue to undertake a risk assessment of our key suppliers to identify medium and high-risk suppliers. Those suppliers assessed as high or medium risk will be encouraged to complete the Government's Modern Slavery Assessment Tool (MSAT). Suppliers achieving a score below 70%, or with identified areas for improvement, will be followed up to support effective action and continuous improvement and be asked to develop plans for improvements based on recommendations. We are reviewing and refreshing our list of medium- and high-risk suppliers to ensure that the list is current and up to date.

Signatory

This statement has been reviewed and approved. This statement is sponsored by the Chief of Strategy and Investment and will be reviewed annually.



Commissioner of Police of the Metropolis