
Modern slavery statement

2021

Overview

We do not tolerate slavery or human trafficking in our business or supply chains. We are committed to continually improving our policies and practices to play our part in tackling this.

This statement sets out the actions that Ofcom has taken to get assurance that slavery and human trafficking are not taking place in its supply chains or any part of its business, and the steps that have been taken to mitigate the risk of modern slavery.

This is Ofcom's first modern slavery statement, and it will be reviewed annually hereafter.

Organisational structure and supply chain

Ofcom is the UK regulator for the communications services that we use and rely on each day in the UK. We regulate the TV and radio sectors, fixed line telecoms, mobiles, postal services, plus the airwaves over which wireless devices operate. Accountable to Parliament, we set and enforce regulatory rules for the sectors for which we have responsibility. We also have powers to enforce competition law in those sectors, alongside the Competition and Markets Authority. Ofcom also works with several entities which have been established under statute or as part of the delivery of our regulatory responsibilities.

Ofcom buys a wide range of services and supplies and has approximately 800 active approved suppliers with over 250 contracts and framework agreements which are supported by the Commercial team.

We directly employ over a thousand employees around the UK. We have set the Real Living Wage as a minimum for all our employees, a voluntary rate of pay set by the Living Wage Foundation that is higher than the government minimum and based on the costs of living — to mitigate against the risk of labour exploitation among low-income workers and households.

Policies

Corporate responsibility is important to us as an employer and a regulator, and we have a range of policies that support us in mitigating the risks of modern slavery in our business and supply chain.

Our people policies and processes conform to both legal requirements and good practice. Collectively, our policies prohibit any threat of violence, harassment and intimidation, compulsory overtime, child labour, discrimination, confiscation of workers' original identification documents and provide workers with freedom to terminate their employment and give access to remedy, compensation and justice for victims of modern slavery.

We set out the ethical standards we expect of our colleagues in our Dignity and Respect Policy. We aim to ensure that we create a safe and inclusive working environment for all our colleagues that is free from harassment, bullying and victimisation, underpinned by mandatory learning on core subjects for all people managers and employees. We have a Grievance policy and a Whistleblowing

policy, designed to give our colleagues a platform to raise concerns about any wrongdoing or poor working practices.

We provide a wide range of resources for employees to support their mental, physical and financial wellbeing, and to help limit the likelihood of exploitation during periods of uncertainty and stress. This includes access to the Ofcom's Wellbeing Hub, Employee Assistance Programmes and, where needed, access to counselling 24/7.

Details of these policies are readily available to all colleagues on our intranet and are subject to a thorough governance process including regular reviews.

We take a partnership approach to union relations. We also support an internal Colleague Forum which is a group of elected employees who meet with the senior management team regularly to discuss employee related issues.

Due diligence processes

Public Contracts Regulations 2015

We are a Contracting Authority under the Public Contracts Regulations 2015. For procurement exercises in scope of these regulations, we utilise Cabinet Office's standard Selection Questionnaire which requires prospective suppliers to confirm that they do not have any convictions relating to child labour or any other forms of human trafficking and that they comply with social and labour law obligations. They are also required to confirm whether they are compliant with the annual reporting requirements of section 54 of the Modern Slavery Act 2015 (where applicable). We verify this by requiring them to provide a link to where statements are published or by providing copies of these documents if the organisation does not have a website.

Depending on the nature of the goods or services being procured, we incorporate proportionate questions about corporate responsibility into our procurement process.

Terms and conditions

We use our own standard terms and conditions for contracts wherever possible. These require contractors to comply with all applicable laws, statutes and regulations including the Modern Slavery Act 2015. We require contractors to notify us of any breach or potential breach of these conditions in their supply chains connected to any Ofcom contract. We also require on-demand access to their premises, personnel, systems and records to be able to verify compliance with this condition.

Where these terms and conditions are not used, we generally utilise terms and conditions developed by purchasing organisations such as Crown Commercial Service which include similar provisions or the Commercial team will negotiate bespoke terms, with specialist legal advice.

Risk assessment and management

Ofcom annually reviews its Risk Management Policy and recognises the need to effectively manage its risks in order to successfully deliver its objectives. The purpose of the document is to outline the key aspects of Ofcom's risk management policy in order to assist Executive Management in making more risk-informed decisions and ensure everyone is aware of their accountabilities and responsibilities in relation to risk management. Our Risk Management Policy is endorsed and approved by the Ofcom Board and Chief Executive as the Accounting Officer.

There is a designated business lead for each contract, and they are responsible for managing the relationship with the contractor. The Risk Management and Commercial teams provide advice and guidance where any risks are identified.

We consider our contract portfolio is at low risk of modern slavery overall as most of our contracts relate to the supply of professional services wholly based in the UK for example, consultancy, market research and training. We are not complacent and will continue to monitor overall risk levels over the next 12 months.

We recognise that there may be some potential risks deep in our supply chains relating to, for example, the manufacturing and assembly of electronic equipment, the production of furniture that we use in our buildings and food supplied through catering services. We look at each of them on a case-by-case basis to identify how we can manage the risks, although we have limited visibility of supply chains beyond our direct contractors. We are prioritising activity to help us gain a better understanding of the highest risk areas over the next 12 months.

Performance indicators

We will measure the success of our approach against the following:

- There are no reports of any incidences of modern slavery within our business or supply chains.
- Our staff are familiar with policies that enable them to report any concerns and they feel comfortable doing so.
- Contractors understand the importance of ensuring that modern slavery is not taking place within their supply chain and the consequences of not taking effective action.

Future plans and priorities

Ofcom is committed to continuously improving and evolving our practices in relation to sourcing products and services ethically. During the next year we will:

- review our approach to the assessment of potential suppliers;
- review our approach to the ongoing management of existing suppliers;
- continue to raise awareness across the organisation; and

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- consider what other positive steps can be taken, including the introduction of a supplier code of conduct.

Training

All members of the Commercial team are required to complete the CIPS Ethical Procurement and Supply eLearning and Test. Developed by the Chartered Institute of Procurement and Supply for all levels of procurement professionals, the programme and test enable the Commercial function to hone skills and knowledge and to demonstrate our commitment to ethical procurement and sustainable supply chains.

Approval

We are making this statement on a voluntary basis in the form set out in section 54 of the Modern Slavery Act 2015. This statement was approved by the Ofcom Board on 15 December 2021 and has been signed by Melanie Dawes, Chief Executive of Ofcom on behalf of the Ofcom Board.

Dame Melanie Dawes
Chief Executive