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|---|---------------------------------|
| <b>Risk Category</b>                              | <b>Risk Response Definition</b> |
| <b>POL</b> = Political/Reputation                 | <b>Avoid</b> (Terminate)        |
| <b>ECO</b> = Economic/Finance                     | <b>Reduce</b> (Treat)           |
| <b>SOC</b> = Social/Community/Citizen/Stakeholder |                                 |
|   | <b>Date reviewed:</b>           |

Project/Programme: Procurement Function Modern Slavery

**RISK REGISTER**

| Risk No. | RISK SECTOR             | COUNTRY/GEOGRAPHY               | PRODUCT OR SERVICE                                    | CONTRACT NAME / SUPPLIER (S)  | CONSEQUENCES  | LIKELIHOOD 1 - 5 | IMPACT 1 - 5 | CURRENT SCORE (L x I) | CURRENT STATUS (Low, Medium, High) | Modern Slavery Statement register check <a href="https://modern-slavery-statement-registry.service.gov.uk/search">https://modern-slavery-statement-registry.service.gov.uk/search</a>  | RISK MITIGATION (strategy & counter-measures)   | DIRECTORATE AFFECTED / OWNER | LIKELIHOOD 1 - 5 | IMPACT 1 - 5 | POST MITIGATION SCORE (L x I) | REScore OF RISK | FURTHER MITIGATION S REQUIRED | DATE IDENTIFIED | REVIEW DATE | FUTURE RECOMMENDATIONS   |
|----------|-------------------------|---------------------------------|---|---|---|------------------|--------------|-----------------------|------------------------------------|--|---|------------------------------|------------------|--------------|-------------------------------|-----------------|-------------------------------|-----------------|-------------|--|
| 1        | Construction            | World Wide                      | Materials   | DN606581 - Highways and Traffic Works Partnering Contract - FM Conway Ltd   | <b>Individual</b> - Enforced labour, labour abuse - slavery, restrictions and freedom of movement.<br><b>Supplier</b> - Reputational Damage, Financial impact<br><b>Lewisham</b> - Reputational Damage                                | 4                | 4            | 16                    | HIGH                               | FM Conway LTD has a Modern Slavery statement: <a href="https://www.fmconway.co.uk/files/library/files/Footer%20Links/FMC_Modern_Slavery_Statement_2021.pdf">https://www.fmconway.co.uk/files/library/files/Footer%20Links/FMC_Modern_Slavery_Statement_2021.pdf</a><br><a href="https://modern-slavery-statement-registry.service.gov.uk/statement-summary/nuC6XsAw/2022">https://modern-slavery-statement-registry.service.gov.uk/statement-summary/nuC6XsAw/2022</a> | Internal - SSQ check, credit safe checks (risk score 100)<br>External - FM Conway has ISO9001:2015 accreditation and CE marking to the requirements of Construction Project Regulations 2013, ensuring that company's products deliver the high safety standards needed for highways.   | HRPR<br>Joe Turner           | 2                | 4            | 8                             | MEDIUM          | Ongoing contract management   | 21-Aug-23       | 31/03/2024  | Consider all high value construction projects in the future  |
| 2        | Construction            | UK                              | Subcontractors / Labour                               | DN606581 - Highways and Traffic Works Partnering Contract - FM Conway Ltd   | <b>Individual</b> - Enforced labour, labour abuse - slavery, restrictions and freedom of movement.<br><b>Supplier</b> - Reputational Damage, Financial impact<br><b>Lewisham</b> - Reputational Damage                                | 2                | 4            | 8                     | MEDIUM                             | FM Conway LTD has a Modern Slavery statement: <a href="https://www.fmconway.co.uk/files/library/files/Footer%20Links/FMC_Modern_Slavery_Statement_2021.pdf">https://www.fmconway.co.uk/files/library/files/Footer%20Links/FMC_Modern_Slavery_Statement_2021.pdf</a><br><a href="https://modern-slavery-statement-registry.service.gov.uk/statement-summary/nuC6XsAw/2022">https://modern-slavery-statement-registry.service.gov.uk/statement-summary/nuC6XsAw/2022</a> | Internal - SSQ check, credit safe checks (risk score 100)<br>External - maintain healthy subcontractor supply chains by ensuring that from initial selection supply chain partners are appointed on the basis of high standards of technical, behavioural & commercial capability. The six-stage process is the foundation of healthy supply chain management regime and is designed to ensure that only competent, capable and trusted suppliers are selected, approved, managed and integrated within company's delivery teams.<br>External - certified by BSI to ISO 9001:2015 (Quality). This includes Highway Sector Scheme 7: 8, 12, 16, 30. Also accredited to BS ISO45001 (Occupational Health and Safety) and ISO 14001:2015(Environmental).<br>External - to regular monitoring carried out by Site Engineers and Supervisors, FM Conway operates a comprehensive audit regime led by an independent member of SHEQ team.   | HRPR<br>Joe Turner           | 1                | 4            | 4                             | LOW             | Ongoing contract management   | 21-Aug-23       | 31/03/2024  | Consider all high value construction projects in the future  |
| 5        | Food                    | Africa/Asia/ India/Europe/China | Rice, fish, oils, cocoa,                              | DN532473 - Lewisham Education Catering Services - Compass Contract Services UK Ltd  | <b>Individual</b> - Enforced labour, labour abuse - slavery, restrictions and freedom of movement (food production and logistics)<br><b>Supplier</b> - Reputational Damage, Financial impact<br><b>Lewisham</b> - Reputational Damage | 4                | 4            | 16                    | HIGH                               | <a href="https://modern-slavery-statement-registry.service.gov.uk/statement-summary/Q2C89aR/2023">https://modern-slavery-statement-registry.service.gov.uk/statement-summary/Q2C89aR/2023</a>  | Internal - Contract manager on high risk supply.<br>External - ESPO Framework accredited supplier & Business Code of Conduct.<br>External - Modern Slavery statement & related policies are underpinned by a number of international standards such as UN Universal Declaration of Human Rights and Ethical Trading Initiative Base Code. Policies. Hold Whistle Blowing, Human Rights and Supplier Code of Conduct), SEDEX member, modern slavery eLearning training module to staff. Committed to formation of a global Human Rights Working Group (HRWG) to enhance their approach to fighting modern slavery and Endorsed the World Business Council for Sustainable Development's Call to Action on human rights and ending slavery  | CYP<br>Fiona Gavin           | 2                | 4            | 8                             | MEDIUM          | Ongoing contract management   | 21-Aug-23       | 31/03/2024  | Ensure future food procurements maintain commitment to modern slavery statements<br>Require Contract Manager request supplier confirm tiered suppliers are MS free |
| 6        | Food                    | Africa/Asia/ India/Europe/China | Support labour, agency, staff                         | DN532473 - Lewisham Education Catering Services - Compass Contract Services UK Ltd  | <b>Individual</b> - Enforced labour, labour abuse - slavery, restrictions and freedom of movement.<br><b>Supplier</b> - Reputational Damage, Financial impact<br><b>Lewisham</b> - Reputational Damage                                | 2                | 4            | 8                     | MEDIUM                             | <a href="https://modern-slavery-statement-registry.service.gov.uk/statement-summary/Q2C89aR/2023">https://modern-slavery-statement-registry.service.gov.uk/statement-summary/Q2C89aR/2023</a>  | Internal - Contract manager on high risk supply.<br>External - ESPO Framework accredited supplier & Business Code of Conduct.<br>External - Modern Slavery statement & related policies are underpinned by a number of international standards such as UN Universal Declaration of Human Rights and Ethical Trading Initiative Base Code. Policies. Hold Whistle Blowing, Human Rights and Supplier Code of Conduct), SEDEX member, modern slavery eLearning training module to staff. Committed to formation of a global Human Rights Working Group (HRWG) to enhance their approach to fighting modern slavery and Endorsed the World Business Council for Sustainable Development's Call to Action on human rights and ending slavery  | CYP<br>Fiona Gavin           | 1                | 3            | 3                             | LOW             | Ongoing contract management   | 21-Aug-23       | 31/03/2024  | Ensure future food procurements maintain commitment to modern slavery statements   |
| 7        | Children & Young People | UK                              | Staff/ Employment                                     | SLA - National Fostering Agency   | <b>Individual</b> - Enforced labour, labour abuse - slavery, restrictions and freedom of movement<br><b>Supplier</b> - Reputational Damage, Financial impact<br><b>Lewisham</b> - Reputational Damage                                 | 2                | 4            | 8                     | MEDIUM                             | The annual statement is from group company Outcomes First Group.<br><a href="https://www.nifa.co.uk/about-national-fostering-group/slavery-statement/">https://www.nifa.co.uk/about-national-fostering-group/slavery-statement/</a><br>Registered on Ofsted.   | External - company are monitored by Ofsted; Safeguarding & Quality Committee provides assurance to the Board of Directors that robust and effective systems are in place; Quality and Compliance team ensures our Fostering services consistently exceed the requirements set out in legislation, national minimum standards and statutory guidance in relation to safeguarding those in a care.<br>External - company uses only specified employment agencies to source labour.  | CYP<br>Olaitan Aregbesola    | 1                | 3            | 3                             | LOW             | Ongoing contract management   | 21-Aug-23       | 31/03/2024  | Widen the scope and monitor other contracts over £1 million  |
| 8        | Adult Social Care       | UK                              | Staff/ Employment                                     | DN623096 - LDF 2 LOT 2 Service LDF2H - Aurora Nexus   | <b>Individual</b> - Enforced labour, restrictions and freedom of movement, servitude, human trafficking<br><b>Supplier</b> - Reputational, criminal, media<br><b>Lewisham</b> - Reputational, media                                   | 2                | 5            | 10                    | MEDIUM                             | do not have a statement<br>Registered charity number 1035083   | Internal - London Living Wage a requirement of contract.<br>Internal - waiting for Supplier Annual Compliance Questionnaire.<br>External - provider conduct Safer Recruitment, DBS, Right to Work checks, and other relevant recruitment checks.<br>External - Aurora Nexus is a registered provider with the Care Quality Commission (CQC).  | Communities<br>Joanne Lee    | 1                | 4            | 4                             | LOW             | Ongoing contract management   | 21-Aug-23       | 31/03/2024  | Include modern slavery statement in procurement and contractual arrangements.<br>use Proud to Care initiative to highlight modern slavery in                       |
| 9        | Adult Social Care       | UK                              | Staff/ Employment                                     | DN622399 - Maximising Wellbeing at Home Services<br>Lot 1 - Carepoint Services Ltd,<br>Lot 2 - Eleanor Nursing and Social Care Ltd,<br>Lot 3 - Allied Health-Services Limited | <b>Individual</b> - Enforced labour, restrictions and freedom of movement, servitude, human trafficking<br><b>Supplier</b> - Reputational, criminal, media<br><b>Lewisham</b> - Reputational, media                                   | 2                | 5            | 10                    | MEDIUM                             | Carepoint Services Ltd and Eleanor Nursing and Social Care Ltd do not have a statement.<br>Allied Health-Services Limited has a MS statement:<br><a href="https://www.alliedhealthcare.com/wp-content/uploads/2019/03/Modern-Slavery-Statement-2.pdf">https://www.alliedhealthcare.com/wp-content/uploads/2019/03/Modern-Slavery-Statement-2.pdf</a>   | <b>Carepoint Services Ltd</b><br>Internal - SSQ check, credit safe checks<br>Internal - London Living Wage a requirement of contract.<br>Internal - waiting for Supplier Annual Compliance Questionnaires.<br>External - conduct Safer Recruitment, DBS, Right to Work checks, Verification of Nursing and Midwifery Council PIN number, Verification of qualifications and training certificates and other relevant recruitment checks.<br>External - registered with and regulated by the Care Quality Commission.<br><b>Eleanor Nursing and Social Care Ltd</b><br>Internal - SSQ check, credit safe checks<br>Internal - London Living Wage a requirement of contract.<br>Internal - waiting for Supplier Annual Compliance Questionnaires.<br>External - conduct Safer Recruitment, DBS, Right to Work checks and training certificates and other relevant recruitment checks.<br>External - registered with and regulated by the Care Quality Commission.<br>External - Eleanor Nursing and Social Care Ltd has Health and Safety Policy Statement and fully compliant with ISO 14001.<br><b>Allied Health-Services</b><br>Internal - SSQ check, credit safe checks<br>Internal - London Living Wage a requirement of contract.<br>Internal - waiting for Supplier Annual Compliance Questionnaires.<br>External - Allied Health-Services conduct Safer Recruitment, DBS, Right to Work checks, Verification of Nursing and Midwifery Council PIN number, Verification of qualifications and training certificates and other relevant recruitment checks.<br>External - Allied Healthcare is CHAS Accredited.<br>External - registered with and regulated by the Care Quality Commission. | Communities<br>Tristan Brice | 1                | 5            | 5                             | LOW             | Ongoing contract management   | 21-Aug-23       | 01/04/2024  | Include Modern slavery statement in future tender<br>Require Contract Manager to request supplier confirm tiered suppliers are MS free                             |
| 10       | Horticulture            | World Wide                      | Staff/ Employment / Seasonal Worker                   | DN543413 - Glendale Services  | <b>Individual</b> - Enforced labour, restrictions and freedom of movement, servitude, human trafficking<br><b>Supplier</b> - Reputational, criminal, media<br><b>Lewisham</b> - Reputational, media                                   | 2                | 4            | 8                     | MEDIUM                             | Parent company (The Parkwood Group) modern slavery statement<br><a href="https://www.parkwood-holdings.co.uk/modern-slavery-policy">https://www.parkwood-holdings.co.uk/modern-slavery-policy</a>  | External - registered with and regulated by the Care Quality Commission.<br>External - Glendale's parent company has a robust MS statement & whistleblowing policy<br>External - Recruit locally.<br>External - Sub contracting agreement contains commitments to comply with MS Act and employment legislation   | HRPR<br>Vince Buchanan       | 1                | 3            | 3                             | LOW             | Ongoing contract management   | 21-Aug-23       | 31/03/2024  | Include Modern slavery statement in future tender<br>Require Contract Manager to request supplier confirm tiered suppliers are MS free                             |
| 11       | Horticulture            | World Wide                      | Plants, bulbs, seeds, materials, logistics, machinery | DN543413 - Glendale Services  | <b>Individual</b> - Enforced labour, restrictions and freedom of movement, servitude, human trafficking<br><b>Supplier</b> - Reputational, criminal, media<br><b>Lewisham</b> - Reputational, media                                   | 2                | 4            | 8                     | MEDIUM                             | Parent company (The Parkwood Group) modern slavery statement<br><a href="https://www.parkwood-holdings.co.uk/modern-slavery-policy">https://www.parkwood-holdings.co.uk/modern-slavery-policy</a>  | External - Glendale's parent company has a robust MS statement & whistleblowing policy. The company has a zero tolerance approach to modern slavery in its supply chain and the MS policy outlines various actions the company takes to address Modern Slavery. For example - potential suppliers must adhere to the Modern Slavery Act & as part of the procurement process & must submit evidence of how they take steps to mitigate Modern Slavery.<br>External - Sub contracting agreement contains commitments to comply with MS Act and employment legislation<br>External - Regularly review their supply chain to identify risks with non compliant sub contractors are removed from the supply chain<br>External - Hold a number of accreditations - ISO 9001, ISO 45001, ISO 14001 .  | HRPR<br>Vince Buchanan       | 1                | 3            | 3                             | LOW             | Ongoing contract management   | 21-Aug-23       | 31/03/2024  | Include Modern slavery statement in future tender<br>Require Contract Manager to request supplier confirm tiered suppliers are MS free                             |
| 12       | Electronics             | Asia                            | Goods - Computers, laptops, mobile phones             | London Borough of Brent   | <b>Individual</b> - Enforced labour, restrictions and freedom of movement, servitude, human trafficking<br><b>Supplier</b> - Reputational, criminal, media<br><b>Lewisham</b> - Reputational, media                                   | 3                | 4            | 12                    | MEDIUM                             |  | Internal - Suppliers on accredited frameworks.<br>External - Lewisham is an affiliate of Electronic Watch (independent monitoring organisation for public buyers) who work to protect the rights of electronic workers in the supply chain by 1) monitoring, and 2) collaborating with civil society organisations to protect workers. Electronic Watch address issues around freedom of association, forced labour and occupational health and safety amongst works in the electronic supply chain. Activity in 2021 included - monitoring 36 electronic manufacturing factories in 8 countries, conducting 16 investigations in 4 countries and detected 17 forced labour cases in 5 countries.<br>They partner with local organisations to monitor suppliers and provide resources (e.g. Contract conditions, and Code)  | Brent<br>Philippa Brewin     | 2                | 2            | 4                             | LOW             | Ongoing contract management   | 21-Aug-23       | 31/03/2024  | Include Modern slavery statement in future tender<br>Require Contract Manager to request supplier confirm tiered suppliers are MS free                             |