

Management Board

Report title: Modern Slavery Statement Review

Meeting date: 16 June 2026

Time required: 5 Minutes

Presenter: Sam McVaigh, Director of People Services

RAPID Role: Agree

Publication decision: Can be published internally and externally

Problem Statement

- 1.1. This report provides Management Board with a copy of the ICO Modern Slavery Statement for review and comment prior to publication in September. The proposed statement can be found as an appendix to this paper.
- 1.2. The paper provides a summary of the previous development of the Modern Slavery Statement and outlines the commitments made at the time to ensure adherence and compliance.
- 1.3. The statement has recently been reviewed by People Services, Procurement and Delivery Group, and is deemed to remain fit for purpose. There are no proposed changes to the content.

Input requested

- 2.1 Approval of the ICO Modern Slavery Statement ahead of publication in September.

Background and summary

- 3.1 In order to comply with the legal requirements under the Modern Slavery Act 2015, a review of our Modern Slavery statement must take place annually, within 6 months of our financial year end. For the ICO, this is the end of September each year.
- 3.2 The Modern Slavery Statement should be published on our external website (we currently publish the statement included at point 4 of this report).
- 3.3 It is expected that the following will be covered in the statement:
 - Organisation structure and supply chains
 - Policies in relation to slavery and human trafficking

- Due diligence processes
- Risk assessment and management

Outcomes and benefits realised

4.1 Training

- 4.1.1 Since the publication of the previous statement, the mandatory modern slavery e-learning introduced in September 2023 has remained in place and continues to form a core part of our approach to raising organisational awareness. The training is embedded within our compliance framework, ensuring colleagues understand the indicators of modern slavery and the appropriate escalation routes where concerns are identified. Refresher training is required every three years, and ongoing monitoring is in place to support continued compliance and awareness across the organisation.
- 4.1.2 As of April 2026, 99% of colleagues have completed the mandatory training. Our target remains 95% completion, allowing for a small proportion of employees who may be unavailable, due to long-term absence for example.

4.2 Recruitment

- 4.2.1 The statement states that: 'We also ensure that any recruitment agency we utilise for the placement of temporary staff follows the same requirements to confirm the identity and right to work of individuals placed with us.'
- 4.2.2 We fulfil this requirement through the use of Crown Commercial Service Frameworks for the procurement of all contingent labour which ensure compliance to appropriate standards. Engagement of workers through this route is managed by People Services, under the governance of the commercial and procurement contract in place.
- 4.2.3 To further strengthen our controls, we are preparing to launch a Contingent Worker Guide for managers. This will emphasise the importance of setting clear, measurable objectives and deliverables for temporary workers. By aligning expected outputs with recorded working hours, managers will be better equipped to assess whether timesheet submissions accurately reflect work undertaken prior to approval, thereby supporting greater transparency and accountability in our recruitment and workforce

management practices. Revisions are complete and a comms plan is in place to launch by the end of May 2026.

4.3 Employee Onboarding

- 4.3.1 The statement states that 'We ensure that all staff are legally entitled to work in the UK and that the contract is directly with them.'
- 4.3.2 All new starters undergo pre-employment screening in line with the Baseline Personnel Security Standard (BPSS). This is the recognised standard for the pre-employment screening of individuals with access to government assets.
- 4.3.3 The checks involved are:
 - Identity
 - Employment history (past 3 years)
 - National and immigration (right to work) status
 - Unspent criminal record
- 4.3.4 The purpose of conducting these rigorous pre-appointment checks is to:
 - Ensure that all new, directly recruited staff are entitled to undertake the employment in question and, where appropriate, meet nationality rules for government service
 - Guard against the employment of anyone posing as a prospective employee for commercial or personal gain
 - Provide a sound basis for any subsequent NSV requirement.
- 4.3.5 Robust arrangements are in place to ensure the BPSS checks are conducted competently and consistently during employee onboarding. Staff responsible for completing these checks are appropriately trained and demonstrably familiar with BPSS guidance, supported by ongoing oversight from a Team Leader who has undertaken external, specialist training in right-to-work requirements. A mandatory onboarding checklist is completed for every new starter, providing clear assurance that all required pre-employment checks have been fully and satisfactorily completed before any appointment is confirmed.

4.4 People Policies

- 4.4.1 There are six ICO policies that relate to the Modern Slavery Act 2015: Code of Conduct, Dignity at Work, Disciplinary, Procurement, Recruitment and Selection and Whistleblowing.
- 4.4.2 The People Services Team aim to conduct a review of People Policies on a rolling three-year basis or as statutory changes are introduced.
- 4.4.3 The review considers both policy content and tone of language.
- 4.4.4 Of the six policies that relate to the Modern Slavery Act 2015, there is one policy that has not been reviewed within the last three years. This is the Disciplinary policy and is currently under review and due for completion by the end of July 2026.

4.5 Procurement

- 4.5.1 Adequate controls are in place with respect to policy and procedure to ensure compliance with the statement.
- 4.5.2 All steps listed are carried out in our procurement processes.
- 4.5.3 Most supply contracts are sourced from Government Commercial Agency (GCA) frameworks, which require suppliers to comply with the terms of the Modern Slavery Act. Where ICO procures outside a framework, our terms and conditions of tender and contract require that suppliers must comply with the Modern Slavery Act.

Proposed amendments to the statement

- We do not propose to make any substantial amendments to the statement published in 2025.

Next steps

Management Board is asked to approve the statement included at appendix 1 prior to publication in September 2026.

Author: Margaret Wilson-Savage, Group Manager ER and Business Partnering

Reviewers: Rosemary Barker, Head of People Services, ER and Business Partnering, Roger Crowley, Head of Procurement

Sign off: Sam McVaigh, Director of People Services

List of annexes: Annex 1: ICO Modern Slavery Statement

ICO Modern Slavery Statement 2026 - 2027

About the ICO

The Information Commissioners Office is the UK's independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals.

We employ approximately 1100 staff and also have people placed with us on a temporary basis through employment agencies. Through our work we also engage with numerous suppliers of goods and services.

Our commitment to the principles of the Modern Slavery Act 2015

The ICO is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking. We acknowledge the role that we can play to help to bring this about.

We are an equal opportunities employer, fully committed to creating and ensuring an inclusive and respectful working environment for all our staff. We want all our staff to feel confident that they can report concerns without any risk to themselves.

Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion.

We recognise that, as a purchaser of goods and services, we have the opportunity to influence good practices in the employment of people by other organisations.

We do not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

In addition to publishing our modern slavery statement on our website we will add this to the Home Office modern slavery statement registry.

Here are the steps the ICO has taken and continues to take to understand and minimise the potential risk of modern slavery in its business and supply chains.

Our supply chain

As a responsible purchaser of goods and services, we recognise our ability to influence ethical employment practices across our supply chains. We

are committed to ensuring that modern slavery, in any form including slavery, servitude, forced or compulsory labour, and human trafficking has no place in our operations or those of our suppliers.

We do not engage in business with any organisation, in the UK or internationally, that knowingly supports or is found to be involved in modern slavery practices.

In line with our commitment to transparency and accountability, we publish our modern slavery statement on our website and submit it to the Home Office's Modern Slavery Statement Registry.

To understand and minimise the risk of modern slavery within our business and supply chains, we have implemented the following measures:

- Conducting due diligence on key suppliers (where this is not conducted by Government Commercial Agency) to assess their compliance with modern slavery legislation.
- Including anti-slavery clauses in our procurement contracts and supplier agreements.
- Providing training and guidance to staff involved in procurement and contract management.
- Reviewing and updating our policies and procedures regularly to reflect best practices and legal requirements.
- Monitoring and evaluating our supply chains to identify and address potential risks.

We remain committed to continuous improvement in this area and to working collaboratively with our partners and suppliers to uphold the highest standards of ethical conduct.

We procure goods and services from the UK and a limited number of overseas suppliers. Where possible we make full use of approved UK Government Procurement Frameworks such as Government Commercial Agency.

We build relationships with our suppliers to ensure they understand our values and comply with our expectation and commitment to protect human rights and the environment.

As part of our procurement processes, we require all of our suppliers to comply with the requirements of the Modern Slavery Act and include appropriate contractual obligations within our commercial agreements.

We require organisations tendering to work with the ICO to confirm that they have fulfilled their statutory requirement to have produced a Modern Slavery Statement if they meet the criteria to do so.

Our policies which relate to the Modern Slavery Act 2015

The following policies are available to all staff through the ICO intranet:

- Code of conduct
- Dignity at Work
- Whistleblowing
- Recruitment and Selection
- Disciplinary Procedure
- Procurement Policy

These policies set out the standards required of our staff and include details of the mechanisms in place for colleagues to report any issues or concerns about modern slavery relating to our organisation.

Due Diligence

- Through undertaking due diligence in our activity, we seek to ensure that we do not inadvertently support Modern Slavery. We make our processes known to potential staff and suppliers as a means of encouraging good practice.
- We ensure that all staff are legally entitled to work in the UK and that the contract is directly with them.
- We also ensure that any recruitment agency we utilise for the placement of temporary staff follows the same requirements to confirm the identity and right to work of individuals placed with us.
- When we undertake a full public procurement process potential suppliers must self-declare if they meet the relevant criteria in the Modern Slavery Act 2015.
- We also reserve the right to challenge any abnormally low-cost tenders to ensure they do not rely upon the potential contractor practising modern slavery.
- We follow guidance provided by the Government Commercial Function and undertake reviews of our current Tier One supply base to categorise our contracts by assessing these against key modern slavery risk indicators.

- When we procure, we make use of Government Procurement Frameworks as far as possible, which provides an additional level of assurance regarding the practices of suppliers.
- We will further review our supplier onboarding process to embed checks on suppliers to ensure compliance with the requirements of the Modern Slavery Act 2015.

Risk Assessment and Management

The two main areas of risk in relation to modern slavery at the ICO relate to our contractual arrangements and recruitment of staff. The steps that we will take to manage these risks are outlined below.

We will ensure that consideration of the modern slavery risks and prevention are added to ICOs Procurement Policy review process as an employer and procurer of goods and services.

We will ensure when undertaking a further review of relevant people policies, they include the consideration and prevention of risks of engagement of people or groups through Modern Slavery.

Training

We will provide mandatory awareness training to all staff on the Modern Slavery Act 2015 and inform them of the appropriate action to take if they suspect a case of modern slavery or human trafficking.

We will ensure that staff involved in buying or procurement, and the recruitment and deployment of workers, receive training on modern slavery and ethical employment practices.

Key Performance Indicators

- 95% of staff will have undertaken mandatory training in relation to modern slavery awareness.
- 100% of suppliers to the ICO publish a Modern Slavery statement where required under the Modern Slavery Act 2015.

The People Services Team conducts a rolling review of People Policies, with the aim of reviewing each policy every three years. Of the six policies relating to the Modern Slavery Act 2015, one has not been formally reviewed within this timeframe. This policy is currently under review as part of the ICO's People Policy Review Programme and is scheduled for completion by the end of July 2026.

Contact details

If you suspect modern slavery, report it to the [Modern Slavery Helpline](#) on 08000 121 700 or the police on 101. In an emergency call 999, your information could save a life.

In addition, staff and external contacts can report any concerns in relation to potential modern slavery linked to the ICO's operations to HRTeam@ico.org.uk.