



Ministry
of Defence

Defence Equipment and Support
Secretariat

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Your Reference:

Our Reference:

Date:

29 October 2014

Dear [REDACTED]

Request for Information

Thank you for your email of 30 September 2014. You asked:

Dear Ministry of Defence,

As part of a research project into ethical procurement policies in the UK's public sector, I would appreciate it if you could provide whatever information is available on the following issues.

1. Total spending on uniforms/clothing/apparel, for a recent year - calendar or financial year. If possible, aggregated for all the armed forces, and for separate services. I'd assume the army would use most.

2. Basic overview of biggest spend items: jackets, trousers, etc.

a) What was spent on which in a year?

b) Numbers of units per year.

My main focus is clothing/uniforms, but it would also be useful to get an idea of spending on footwear/blankets if possible. I don't need an exhaustive list of all products – just main categories.

3. Main countries garments are sourced from. Some indication of volumes would be helpful. Eg, 40% from UK manufacturers; 20% from other EU countries; X,000 from China; 10% from Bangladesh and Cambodia.

Ethical procurement policies:

Government Buying Standards for clothing/textiles include standard contract conditions as follows:

Ethical standards in production

Bidders must provide information to illustrate that suppliers and production sites should hold an independently audited and internationally - recognised standard relevant to the product, in order to demonstrate how they are addressing ethical and social issues such as living wage provision, avoidance of child labour, application of fair trade principles, adequate working conditions, animal welfare in the manufacture of textiles.

Verification: Relevant protocols and standards include those by the ILO, Fair Trade Foundation, Ethical Trading Initiative. Indicative standards are SA8000 or ISEAL. Other private or national textile labels fulfilling the listed criteria can also be accepted. Any other appropriate means of proof, such as a technical dossier of the manufacturer or a test report from a recognised body will also be accepted.

Questions

4. Does the MOD apply Government Buying Standards to clothing/apparel buying by including ethical contract performance requirements in contracts? If the MOD has its own ethical procurement policy could I get a copy?

Could you provide any information on what is known about working conditions in the supply chains of uniforms/clothing sourced in developing countries - specifically:

5. Compliance with International Labour Organisation core conventions and national labour laws especially regarding: safety; minimum wages; maximum working hours; respect for trade union rights.

6. How compliance is verified, eg, by audit reports, in contract performance review meetings.

7. What working conditions actually are: minimum wages paid; working hours; whether an independent trade union is recognised – ie, reporting beyond verification of compliance with laws.

8. If any breaches have been reported, and, if so, what remedial actions the MOD asked of suppliers and how conditions are monitored.

Buying methods

9. Are uniforms/clothing bought:

a) Through national framework agreements? If so which ones?

b) Direct from factories – particularly in developing countries

c) From importers/wholesalers who commission manufacturing.

I am treating your correspondence as a request for information under the Freedom of Information Act 2000 (FOIA). A search for the information has now been completed within the Ministry of Defence (MOD), and I can confirm that all the information in scope of your request is held.

The Defence Clothing Team (DCT), part of Defence Equipment & Support, is responsible for providing all clothing to the Regular Forces, Army Reservists, MOD Police and Guards, and Cadets. In financial year 2013/2014 the total spend by the DCT on uniforms/clothing was £64.7M.

The top four items grouped by commodity code are as follows (Spend rounded to nearest £1M, each item (units) rounded to nearest 10k):

Defence Equipment & Support

Footwear	£18M – 750K Units
Combat Garments	£15M-1.2M Units
Taped Seam Garments (Waterproofs and Sleeping Bags)	£9M – 230K Units
Parade and Ceremonial Dress	£5M – 100K Units

The MOD is clear that competition remains the best procurement strategy to deliver value-for-money for the defence budget. It enables us to secure good quality products at affordable costs and, at both prime and sub-contract level, encourages innovation, flexibility, efficient use of resources and the development of skills and knowledge.

The MOD is bound by European Union Public Procurement Directives which demand fair and open competition for all contracts involving the expenditure of public funds. This means that we are unable to restrict competitions in favour of just UK based companies. In addition, provided certain conditions are met, the MOD does not seek to limit where its prime contractors place production work.

A contract may have more than one country of manufacture. The breakdown of the £64.7 million expenditure (rounded to the nearest million) by location of manufacture is approximately:

UK - £4 million
EU - £30.7 million
North Africa - £1 million
Indian Sub-Continent - £4 million
Far East - £25 million.

The MOD does not hold a list of countries used by our prime contractors to manufacture clothing items.

When awarding a contract to a prime contractor, and as part of the contractual conditions, the MOD stipulates certain environmental and labour standards that must be achieved. The MOD is required to comply with all legislation and government policy appertaining to health and safety at work, environmental protection and social responsibility. Subject to these conditions the MOD does not restrict the geographical location of manufacture. However, the MOD does expect prime contractors to carry out regular and appropriate inspections to provide assurance that sub-contractors' facilities and ways of working meet MOD's contracted terms. A contract may have more than one country of manufacture and, indeed, a country of manufacture may change within the life of a contract.

In terms of volume of manufacture, the majority of MOD uniform garments are currently sub-contracted by our prime contractors to the Far East: notably China.

The MOD does not have a separate Departmental Ethical Procurement Policy. However, it does adhere to the Government Buying Standards and complies with the requirements of SA8000 from the International Labour Organisation (ILO). At each stage of the competition the MOD requires evidence of compliance from those companies interested in securing the specified contract.

Compliance is measured through personal observations at the contractor or sub-contractor premises, also audit reports are utilised at contract review meetings. The MOD relies on the contractor to ensure conditions are achieved within the policy, registration to the ILO policies and laws within those countries that they are working in.

The MOD does not hold information on any breaches of the ILO requirements.

If you are not satisfied with this response or you wish to complain about any aspect of the handling of your request, then you should contact me in the first instance. If informal resolution is not possible and you are still dissatisfied then you may apply for an independent internal review by contacting the Information Rights Compliance team, 1st Floor, MOD Main Building, Whitehall, SW1A 2HB (e-mail CIO-FOI-IR@mod.uk). Please note that any request for an internal review must be made within 40 working days of the date on which the attempt to reach informal resolution has come to an end.

If you remain dissatisfied following an internal review, you may take your complaint to the Information Commissioner under the provisions of Section 50 of the Freedom of Information Act. Please note that the Information Commissioner will not investigate your case until the MOD internal review process has been completed. Further details of the role and powers of the Information Commissioner can be found on the Commissioner's website, <http://www.ico.gov.uk>.

Yours sincerely,

DE&S Secretariat
For Head of Secretariat