



Modern Slavery and Human Trafficking Statement

Job No: HR Policy

Doc Ref: HR/055

Latest Revision: -

Date: 11/04/2019

Project Name:	HR Policy and Procedure
Client:	Cundall
Report Title:	Modern Slavery and Human Trafficking Statement
Job Number:	N/A

Document Revision History

Revision Ref	Issue Date	Purpose of issue / description of revision
A	11/04/2019	Update for 2018/19 Financial Year

Document Validation (latest issue)

12/04/2019

X 

Carole O'Neil
Principal Author
Signed by: O'Neil, Carole

23/04/2019

X 

Samantha Hammond Opelt
Checked By
Signed by: Hammond-Opelt, Samantha

 Recoverable Signature

X 

Tomas Neeson
Verified By
Signed by: adf09ee1-f86a-4dce-803e-a0421eff5567

1. Modern Slavery and Human Trafficking Statement

1.1 Introduction

This statement sets out the actions that Cundall Johnston and Partners LLP, Cundall Limited and their subsidiary companies (“Cundall”) will take to prevent modern slavery and human trafficking risks in its own business(es) and its supply chain(s) in accordance with Section 54 of the Modern Slavery Act 2015 (“the Act”).

This statement was reviewed in April 2019 and relates to actions and activities during the financial year(s) commencing **1 July 2018**, and will be reviewed as necessary.

1.2 Statement of Commitment

As part of its work in the construction and engineering sector, Cundall recognises that it has a responsibility to take a robust approach to modern slavery and human trafficking.

Cundall is absolutely committed to preventing modern slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from modern slavery and human trafficking.

1.3 Organisational structure and supply chains

Cundall delivers multi-disciplinary consultancy services in the built environment sector.

As a professional services business engaged in the delivery of consultancy services, Cundall's work is delivered by staff who are employed directly by the business, suppliers who are engaged by Cundall to deliver sub consultancy services or suppliers who supply office consumables.

Cundall currently operates in the following regions:

- United Kingdom and Ireland
- Europe
- Middle East and North Africa
- Asia
- Australia

Cundall assesses whether or not particular activities or countries are high risk in relation modern slavery or human trafficking by reference to the following key criteria:

- Press reports
- The existence (or otherwise) of legislation or regulation relating to the supply of labour in the market
- Custom and practice amongst suppliers

1.3.1 *Higher-risk activities*

Cundall considers that the majority of its activities are low risk in relation to modern slavery or human trafficking. However, the following activities are considered to be those which may present a higher risk in this regard:

- Projects where Cundall works as part of a team with a contractor (particularly in locations outside the UK) to deliver a project, and where that contractor may adopt labour practices which do not conform with Cundall's own standards.

1.3.2 *Responsibility*

Responsibility for Cundall's anti-slavery initiatives is as follows:-

Policies

Cundall's Human Resources team is responsible for preparing draft policies, in consultation with managers across the organisation. Draft policies are reviewed by Cundall's Legal Department, and signed off by Cundall's Management Board.

Policies are reviewed (at least) annually, on the anniversary of the date on which the policy was first approved.

Risk Assessments

Risk assessments in relation to particular activities are undertaken by the Partner (or other senior manager) with overall responsibility for that area of activity. For instance:-

- Risk assessments in relation to project-related activities are the responsibility of the individual Project Director;
- Risk assessments in relation to employment practices are the responsibility of the Human Resources and Training Partner;
- Risk assessments in relation to supply chain activities are the responsibility of the Finance Partner;
- Risk assessments in relation to general business activities not falling within the specific remit of an individual Partner (or other senior manager) are the responsibility of the Legal Director.

Investigations / Due Diligence

Where instances of modern slavery and/or human trafficking are known or suspected, an initial investigation will be carried out by the Partner (or other senior manager) with responsibility for the business area or the geographic region in which the activity is suspected to have taken place, with support from other functions within the business as required. Investigations may include (amongst other things) some or all of the following:-

- A review of documentation relevant to the suspected activity;
- Interviews with staff members involved in the suspected activity;
- Interviews with clients or suppliers involved in the suspected activity.

Training

This statement is communicated to all permanent, temporary and contract staff employed by Cundall as part of the standard induction process.

Training is provided to those with responsibility for the management of staff on the measures that Cundall has put in place to minimise the risk of slavery and human trafficking. This training is provided on (at least) an annual basis.

This statement is communicated to clients and suppliers via Cundall's website, and is referenced in our standard form supplier contracts.

1.4 Relevant Policies

Cundall operates the following policies which are relevant to the identification of modern slavery risks, and which serve to minimise the risk of modern slavery and human trafficking in its operations.

1.4.1 Disciplinary Policy

Cundall's disciplinary procedures make clear to employees the actions and behaviours expected of them in the course of their employment or engagement. Cundall strives to maintain the highest standard of employee conduct and ethical behaviour when operating in all of its geographical locations, and when managing its supply chain.

1.4.2 Ethical Business Policy

Cundall's Ethical Business Policy makes clear its commitment to ethical business in all of the geographical locations in which it operates, irrespective of local customs or practices.

1.4.3 Recruitment and Selection Policy

Cundall uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency prior to accepting introductions from that agency. Expectations of employment agencies are clearly stated in Cundall's standard terms of business, to which all new agencies are required to subscribe.

1.5 Due diligence

Cundall's due diligence and reviews include:-

- Mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- Participating in collaborative initiatives focused on human rights in general, and modern slavery and human trafficking in particular, for instance through the work of our "Green Teams" in each office, who have driven the procurement of "Fair Trade" produce for a variety of business activities; and
- Invoking sanctions against suppliers that seriously violate our supplier code of conduct, including the termination of the business relationship.

During Cundall's modern slavery and human trafficking due diligence review, it became apparent that Cundall needed to introduce measures to ensure traceability throughout our supply chain. As a result,

Cundall is to send out modern slavery and human trafficking questionnaires to new suppliers, to ensure their compliance with the Act.

Cundall will not progress to working with suppliers which do not agree to comply with the Act.

Cundall has also amended our standard contractual terms for suppliers to include obligations to comply with the Act. This contractually requires suppliers to:

- maintain records that allow traceability throughout our supply chain,
- report breaches; and
- detail the steps they have taken to ensure there is no modern slavery or human trafficking in their operations.

1.6 Cundall has the right to terminate a supplier agreement with immediate effect if it identifies that a supplier is breaching or has breached the Act. Performance indicators

Cundall has introduced some specific key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. These are as follows:-

- Disseminating our Ethical Business Policy to all staff as part of their induction programme upon joining the business;
- Requiring all staff with responsibility for procurement to undertake formal training on issues pertaining to modern slavery and human trafficking on an ongoing basis as required.
- Developing a bespoke supply chain policy, which will cross-refer to this policy and the firm's Ethical Business Policy, and which specifically addresses the risks associated with modern slavery and/or human trafficking.

1.7 Training

Cundall requires all staff with specific responsibility for procurement to complete an online training course.

Cundall's modern slavery training covers:-

- Cundall's standard purchasing practices, which are designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- How to identify the signs of modern slavery and human trafficking;
- What initial steps should be taken if modern slavery or human trafficking is suspected;
- How to escalate potential modern slavery or human trafficking issues to the relevant parties within the organisation;
- What external help is available, for example through the Modern Slavery Helpline, Gangmasters Licensing Authority and "Stronger Together" initiative;
- What messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and

- What steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

1.8 Awareness-raising programme

As well as training staff, Cundall has raised awareness of modern slavery issues by disseminating this statement and associated measures through the use of emails to staff and news items on its intranet. These communications cover:-

- The basic principles of the Modern Slavery Act 2015;
- How employers can identify and prevent modern slavery and human trafficking;
- What employees can do to flag up potential modern slavery or human trafficking issues to the relevant parties within the organisation; and
- What external help is available, for example through the Modern Slavery Helpline.

1.9 Board Approval

This statement has been approved by Cundall's Management Board, who will review and update it as required.

Managing Partner's signature:



Managing Partner's name:

Tomás Neeson

Date: 12 April 2019