

## MODERN SLAVERY CORPORATE STATEMENT

### Introduction

CMC Partnership Consultancy Ltd ('CMC') supports businesses to achieve their transformation aims through the provision of business analysis, change management, delivery management and agile consultancy services. A Small Medium Enterprise (SME) registered in the UK, CMC can demonstrate a successful track record of providing high quality services to both private and public sectors. We are strongly committed to being a responsible business and have held consistent accreditation to the recognised international standards ISO9001, ISO14001 and ISO27001 for a number of years.

### Commitment to the Modern Slavery Act 2015

Although not required to comply with the Modern Slavery Act 2015, as a company we are committed to ensuring that there is no modern slavery or human trafficking within our supply chains. We will not engage with any third party involved or associated with modern slavery or human trafficking. While the concept of slavery and human trafficking may seem less relevant to a consultancy-focussed SME, we believe the issue should not be ignored and have ensured that we have suitable procedures in place.

### What is Modern Slavery?

Modern slavery is a crime resulting in an abhorrent abuse of human rights. It is constituted in the Modern Slavery Act 2015 by the offences of 'slavery, servitude and forced or compulsory labour' and 'human trafficking'. A full definition of modern slavery is available at **Annex A**.

### Corporate Responsibility

CMC's directors take responsibility for ensuring CMC's compliance with all applicable laws relating to anti-slavery and human trafficking, including the Modern Slavery Act 2015, and they review this topic on a regular basis. The director responsible for ensuring continued commitment to antislavery processes and behaviours is Brian Clancy. He ensures that the company reviews the applicable procedures and measures in place on a regular basis.

### Summary of Relevant Corporate Procedures and Processes

Our **Purchasing Procedure** is set within the context of our commitment to promote corporate sustainability. The procedure promotes business-wide quality, ethical and environmental practices, including consideration of modern slavery. We provide appropriate awareness and training to our employees involved in these processes. We review supplier commitment to and compliance with the Modern Slavery Act 2015 as part of our **supplier management process**, which includes our prequalification process, risk assessment, approval procedure, and ongoing supply chain management.

This statement takes into account and is supported by our **Whistleblowing Policy**. We encourage all our employees, customers and any other business partners to report any concerns related to the direct activities or the supply chains of our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.

### Corporate Risk Assessment

Our Modern Slavery Risk Assessment has demonstrated that the risk to our business is currently minimal as summarised below.

- We do not operate in a context where modern slavery is prevalent: our services are delivered through individuals who are known to us and assessed on a one to one basis through a robust screening and interview process. Moreover all our permanent consultants are screened to Baseline Personnel Security Standards. We also supply a large number of security cleared resources who undergo a still more rigorous screening process.
- Our supply chain primarily comprises associate consultants who are also all screened to Baseline Personnel Security Standards, and frequently security cleared.
- Our main supplier is our UK-based outsourced IT managed service provider.
- Our purchasing is minimal as we are a professional services organisation. All our major purchases are carried out in accordance with our established purchasing procedure, which includes consideration of Modern Slavery as well as other ethical and environmental considerations.

Particular business risks we have considered in assessing and managing risks to workers include:

- **Country risks:** We are UK-based.
- **Sector risks:** As we operate exclusively within management consulting the sector risk has been deemed minimal.
- **Transaction risks:** We use one of the large, established UK-based banks so the risk has been deemed minimal.
- **Business partnership risks:** All our supplier relationships are assessed using our PQQ risk assessment process. Each supplier relationship has an assigned service manager who is responsible for managing the relationships and reviewing any identified risk.

### Due Diligence Measures

Our protective measures include the following:

- Training and awareness is provided for staff on the issues - as part of our standard induction process and in particular for staff involved in purchasing or supply chain management.
- Anti-slavery clauses are included in our supplier agreements.
- A rigorous pre-qualification questionnaire and risk assessment process is undertaken on all new or potential suppliers to include anti-slavery

practices and procedures - including requesting confirmation from suppliers that their business and supply chains are free from slavery and that they have appropriate policies or practices in place.

- Service managers are assigned to oversee supplier relationships and manage any risks - reviewing these on a regular basis. All major purchases are signed off by a senior manager and/or director.

***Statement approved by the Senior Leadership Team & Board of Directors, CMC Partnership Consultancy Ltd, December 2018***

## **Annex A: Modern Slavery Definition**

Modern Slavery is a term used to encapsulate both offences in the Modern Slavery Act: slavery, servitude and forced or compulsory labour; and human trafficking.

The offences are set out in section 1 and section 2 of the Act, which can be found at: <http://www.legislation.gov.uk/ukpga/2015/30/section/1/enacted> and <http://www.legislation.gov.uk/ukpga/2015/30/section/2/enacted>

### ***Definition of Slavery and Servitude***

Slavery, in accordance with the 1926 Slavery Convention, is the status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised. Since legal 'ownership' of a person is not possible, the key element of slavery is the behaviour on the part of the offender as if he/ she did own the person, which deprives the victim of their freedom. Servitude is the obligation to provide services that is imposed by the use of coercion and includes the obligation for a 'serf' to live on another person's property and the impossibility of changing his or her condition.

### ***Definition of Forced or Compulsory Labour***

Forced or compulsory labour is defined in international law by the ILO's Forced Labour Convention 29 and Protocol. It involves coercion, either direct threats of violence or more subtle forms of compulsion. The key elements are that work or service is exacted from any person under the menace of any penalty and for which the person has not offered him/her self voluntarily.

### ***Definition of Human Trafficking***

An offence of human trafficking requires that a person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult. In addition, the exploitation of the potential victim does not need to have taken place for the offence to be committed. It means that the arranging or facilitating of the movement of the individual was with a view to exploiting them for sexual exploitation or non-sexual exploitation. The meaning of exploitation is set out here: <http://www.legislation.gov.uk/ukpga/2015/30/section/3/enacted>.