

Modern Slavery Statement

Scope

CMC Partnership Consultancy Ltd ('CMC') supports businesses to achieve their transformation aims through the provision of change management consultancy services.

CMC policies provide a framework for corporate governance. Policies, corporate statements and procedures are reviewed on a regular basis to ensure they meet the needs of the business, including all regulatory, audit and contractual compliance requirements. Changes to policy will be communicated and further training provided if required.

Roles and responsibilities

- Company directors are responsible for creating an organisational culture which supports delivery of the company's policy objectives.
- Business and line managers provide policy awareness through induction and ongoing training.
- All employees and users of company IT services have a responsibility to adhere to company policy.
- Parties working on behalf of CMC – sub-contractors, third party suppliers and business partners – will be contractually required to comply with CMC's Modern Slavery Statement and specific policies and procedures: Anti-Bribery and Corruption; Environmental; Health, Safety and Mental Wellbeing; and Equality, Diversity and Inclusion. The Anti-Bullying, Harassment and Acceptable Use, Information Security Management and Digital and Social Media policies may also apply, depending upon the level of engagement. These documents will be made available on CMC's website, or shared directly with third parties as defined in their contractual agreements.

Non-adherence to CMC policies, associated procedures and formal guidance may result in disciplinary action, including dismissal or contract termination. It may also invoke criminal and/or civil penalties.

This statement was reviewed and approved by the CMC Operations Board.

Date: 08.12.2023

Signed by: John Daley, Managing Director

Signature: 

Modern Slavery Statement

Commitment to the Modern Slavery Act 2015

Although not required to comply with the Modern Slavery Act 2015, we are strongly committed to ensuring there is no modern slavery or human trafficking found within our business, including our supply chains.

CMC will not engage with any third party involved or associated with modern slavery or human trafficking, including our supply chains. While the concept of slavery and human trafficking may seem less relevant to a consultancy-focused organisation, we believe the issue should not be ignored and have ensured we have suitable governance controls in place to manage this.

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.

Roles and responsibilities

The Operations Board takes full responsibility for ensuring CMC's compliance with all applicable laws relating to anti-slavery and human trafficking, including the Modern Slavery Act 2015. This topic forms part of the Board's regular policy setting and review process.

This Modern Slavery Statement is supported by CMC's Whistleblowing Policy.

We encourage all our employees, customers and business partners to report any concerns related to our 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.

Identifying and managing risks

CMC's externally audited quality management system provides a rigorous framework to assess corporate risk. This assessment is used to design applicable policies, procedures and mitigating controls, ensuring CMC remains compliant with all applicable laws, including the Modern Slavery Act 2015.

The quality management team meet formally on a regular basis to evaluate and report upon CMC's modern slavery commitments, reviewing CMC's supply chain, approving new suppliers, evaluating KPI's and reporting upon any concerns or reported issues that impact corporate compliance.

Corporate risk assessment

Our modern slavery risk assessment has demonstrated that the risk to our business is currently minimal. The business risks we have considered in assessing and managing risks to workers include:

Location: CMC is UK-based and we work predominately with other UK-based organisations.

Sector: We do not operate in a context where modern slavery is prevalent. Our people are paid above the UK's living wage, and our services are delivered through individuals who are known to us and assessed on a one-to-one basis.

Transactions: We use one of the large, established UK-based banks for processing all our financial transactions.

Purchasing: Our purchasing is minimal as we are a professional services organisation. Our main supplier is our UK-registered IT provider which publicly shares its commitment to be a responsible business in taking a robust approach to modern slavery and human trafficking.

Summary of relevant corporate procedures and processes

Our company policies and quality procedures are set within the context of our commitment to promote corporate sustainability.

- We check compliance with all applicable laws relating to anti-slavery and human trafficking, including the Modern Slavery Act 2015. This forms part of our continuous improvement process governed by our quality management system.
- We recruit directly following a documented resourcing procedure. This process is managed internally, including interviewing and screening of candidates to UK Baseline Personnel Security Standards.
- We provide appropriate awareness and training to our employees, with more detail provided to those involved in recruitment and purchasing activities or supply chain management. Training is delivered through the onboarding process and continuous learning and development programmes.
- We procure in accordance with our established purchasing procedure which includes consideration of modern slavery as well as other ethical and environmental aspects.
- We use a rigorous pre-qualification questionnaire and risk assessment process, and explicitly review supplier commitment to and compliance with the Modern Slavery Act 2015 as part of our contract management procedure and supply chain management processes.
- We require confirmation from suppliers that their business and supply chains are free from slavery and that they have appropriate policies or practices in place before suppliers are approved.
- We include anti-slavery clauses in our supplier agreements. Our suppliers are managed directly by an assigned service manager, who is responsible for managing the relationship, and reporting risks and any concerns to the quality management team.

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:

- <https://www.legislation.gov.uk/ukpga/2015/30/section/1/enacted>

- <https://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>