

Modern Slavery Statement

Introduction

This Statement sets out Hackett & Hackett's commitment to recognising and preventing slavery and human trafficking in all its business activities and within its supply chains. It outlines the steps we have taken to ensure compliance with the Modern Slavery Act 2015 (MSA) and minimise the risks of any association with practices which undermine the principles of safety and dignity for our customers and staff, particularly with respect to people from vulnerable groups.

The most vulnerable groups in the UK include migrant workers, illegal migrants, asylum seekers and individuals, such as homeless people and people with learning disabilities. We continue to investigate and monitor how modern slavery and human trafficking may affect customers, staff and our business and supply chains and ensure that we respond effectively through our policies and our actions.

This Statement covers our current position on modern slavery and activities undertaken during the financial year 2019/20. The Statement applies to the whole Hackett & Hackett Group, and all parts of the Group are expected to minimise the risks of slavery and human trafficking in their business and supply chains.

Due Diligence

We have taken time to understand the implications of the MSA and identify the areas within our business and supply chain where the greatest risk exists.

These are:

- Procurement – modern slavery can occur in a supply chain through inadequate or inappropriate procurement practices. Our supply chain consists mainly of services rather than goods, with the highest risk areas being associated with our building and maintenance activity.
- Supporting vulnerable clients within Hackett & Hackett Care and Support – we may also come across slavery and/or human trafficking in connection with the vulnerable people we support, in particular those from minority or socially excluded groups who may be subject to forced labour and/or domestic servitude, and potentially in connection with our workforce.



- We have identified the main risks in respect of these key areas and put measures in place to mitigate them. These include:
- Undertaking a review of our policy framework and instigating amendments to support compliance.
- Screening our procurement documentation to ensure that adequate safeguards are in place at each stage in the process i.e. soft market testing, pre-qualification questionnaires and formal tender. Our documentation already reflects our commitment to being a responsible business by incorporating requirements on social value.
- Ensuring both Hackett & Hackett and any preferred supplier employment agencies we use have the correct checks and balances within recruitment systems, such as eligibility to work in the UK and Disclosure and Barring Service (DBS) or Disclosure Scotland checks.

Supply Chain & Procurement

We have taken steps to satisfy ourselves that the supply chain for relevant subsidiaries is satisfactory in terms of the requirements of both the MSA, as well as meeting any formal requirements we set out for our suppliers.

Our Group Procurement Policy is designed to ensure that all business units, subsidiaries and commercial entities owned and controlled by The Hackett & Hackett Group operate in a legal, ethical and inclusive manner whilst achieving best value for money. This includes enabling our procurement activity to generate social and environmental, as well as commercial benefits. It was last reviewed in February 2019, and includes a Statement on modern slavery, along with how to be a responsible company (social value) and sustainability.

Safeguarding

The Hackett & Hackett Safeguarding Policy includes reference to modern slavery as a type or pattern of behaviour which constitutes abuse of a person at risk; it also requires all Hackett & Hackett employees to complete training on safeguarding adults and children. A guide to the MSA is available to all employees on the safeguarding pages of Hackett & Hackett's intranet, alongside the safeguarding policies and procedures.

People

Our People Policy makes explicit reference to the MSA. The policy also emphasises that Hackett & Hackett is committed to dignity at work and fair treatment of all colleagues.

Recruitment

The Group's Recruitment and Selection Policy contains relevant requirements in terms of checking eligibility to work in the UK and carrying out of necessary checks such as DBS (Disclosure and Barring Service) checks or Disclosure Scotland checks in Scotland.



Monitoring Effectiveness

Whilst a wider range of performance indicators will be considered in the future, the main method of monitoring effectiveness within the supply chain will be the pre-qualification criteria for suppliers, which includes a requirement to have measures in place to minimise the possibility of modern slavery in their business and supply chain.

In the short to medium term we have introduced a Source – to – Contract system which gives us the ability to monitor the continued compliance of our supply chain to our standards for the whole contract period. This will include suppliers providing the necessary accreditations, insurances and relevant certificates to be held in a central repository which will alert us when these are due to lapse.

In the medium to longer term we will consider the introduction of Constructionline whose gold membership includes legislation checks, such as modern slavery. However other options will also be considered such as employing an external auditor to do audits on our suppliers in relation to modern slavery.

Elements of contract management which are built into performance dashboards are mindful of not creating environments where modern slavery (particularly in the shape of bonded labour) may become a way a supplier or production site tries to deal with unrealistic short time pressure and related expectations on their operations or supplying partnership.

Completion of mandatory training is monitored, and processes are in place to identify and address instances in which staff members have failed to complete.

Governance

Responsibility for compliance with the MSA rests at the highest level with our Group Board and across the whole Leadership Team, with responsibility for the Statement assigned to the Director of Governance & General Counsel. Specific responsibilities have been assigned to the heads of services which are identified as key risk areas:

- Supply chain
- Vulnerable clients
- Human resources

