

The header image features a teal triangle on the left containing the text 'Modern Slavery Act Statement October 2018'. The background is a complex, overlapping grid of black lines on a white background, resembling a modern architectural or structural design.

Modern Slavery Act Statement October 2018

Public

This statement summarises the steps that Control Risks has taken to ensure that slavery and human trafficking are not taking place either within our business or in our supply chains. The statement refers to the financial year ending in April 2018 in accordance with Section 54 of the Modern Slavery Act 2015.

Background

Control Risks is a specialist risk consultancy that helps to create secure, compliant and resilient organisations in an age of ever-changing risk. We work across the world from a network of 37 offices and operate in accordance with shared standards and principles. Employing around 2,500 people from highly diverse backgrounds, we work with clients from the public, private and non-profit sectors. We have worked for clients from all industry sectors in more than 150 countries.

Our ethical commitment

Our Code of Ethics summarises our commitment to business integrity. Our Human Rights Policy provides further elaboration. The policy affirms that “Control Risks has zero tolerance for modern slavery and human trafficking”. Furthermore, the company is “committed to implementing effective systems and controls to ensure that neither practice is occurring anywhere in its supply chains”.

We have been a signatory to the UN Global Compact since 2007, and issue annual Communications on Progress affirming our application of the Compact’s ten principles, including with regard to labour rights.

Risk analysis

In our capacity as a professional services firm, we judge that the risk of slavery or human trafficking existing within our own business is low. However, in response to the Modern Slavery Act, we keep the risk of slavery or other forms of labour malpractice within our supply chain under constant review.

In our initial risk assessment following the enactment of the Modern Slavery Act, we took particular account of the Global Slavery Index with a focus on high-risk jurisdictions. However, while geographical patterns of risk remain an important factor in our analysis, we have also been alerted to the exposures that may apply in particular sectors, including in countries with high governance standards that might otherwise be considered low-risk.

One of the findings of our ongoing risk review is the need to place a particular focus on our relationship with suppliers of personnel such as cleaning or driving services, noting that in many jurisdictions such services are provided by low skilled or migrant workers who may be more vulnerable to exploitation. We have therefore been placing such suppliers under closer scrutiny. In acknowledgement of these potential exposures, we have taken steps to enhance our procedures for engaging with these service providers.

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Supplier Management Policy and Procedures

In late 2017 we launched our Supplier Management Policy and Procedures. A key principle of the policy is that the selection and management of suppliers must “minimise the risk of illegal, unethical or unprofessional behaviour” and, specifically in relation to labour, “where a supplier provides personnel to Control Risks it should have ethical employment practices”.

As part of our engagement procedures, we require suppliers of personnel to complete a “Labour Questionnaire” covering their own recruitment and employment practices, for example with regard to the payment of overtime and the availability of grievance mechanisms. We evaluate their responses carefully, drawing on the expertise of our own regional and subject matter specialists where needed.

We also ensure that supplier contracts contain appropriate provisions regarding compliance with applicable anti-slavery and human trafficking laws and regulations, including the right to audit.

We are now planning a special campaign across our global office network to raise awareness of the relevant vetting and training procedures for managing these supplier relationships.

Project risks

In the case of a small number of particularly complex or high-risk projects, we set up an additional risk committee which is responsible for reviewing risks – including potential labour welfare concerns – at regular intervals. The project risk committee does this in association with – but independently of – the project management team. The committee may also recommend supplementary country-specific implementation procedures, including with regard to labour welfare risks, to reinforce the implementation of our human rights commitments.

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Training

In March 2018 we launched our new internal human rights training course. This takes the form of eight videos followed by a short test. The training is available to everyone, and mandatory for all senior employees within internal corporate functions as well as members of the following teams: Crisis and Security Consulting; Compliance, Forensics and Intelligence; Global Risk Analysis; and Response and Cyber Security.

The first four videos explain our commitment to the Universal Declaration on Human Rights and the UN Guiding Principles on Business and Human Rights. They then review the particular issues associated with security, human rights and labour with particular reference to international labour conventions and the Modern Slavery Act. In accordance with our Client and Project Risk Management Policy, the fifth and sixth videos explain how our business teams should assess potential human rights concerns when taking on new clients and projects. The final two videos emphasise the need for continuous risk assessment in the course of our assignments and explain how and when to report problems.

We encourage Control Risks employees to raise any ethical concerns, including with regard to labour welfare. In the first instance, we expect them to talk with senior management. Alternatively, they may raise the matter with the company's Ethics Committee or make a confidential report to our Whistleblowing hotline, and we will be emphasising this point in training planned for the coming year.

Where appropriate, we will provide supplementary training to employees with specific responsibilities, for example with reference to the Supplier Management Policy.



Nick Allan

CEO

1 October 2018