

# Modern Slavery Act 2015

## Modern Slavery Statement

September 2024

### Introduction

It is very important to us that we trade ethically, source responsibly and work to prevent modern slavery throughout our organisation and in our supply chain, because it is the right thing to do. This statement highlights the key activities we have undertaken during the past financial year, our achievements, and the next steps we intend to take to continue combatting modern slavery.

Our definition of modern slavery aligns with that of the International Labour Organisation (ILO) and includes all forms of exploitation for personal or commercial gain, including bonded labour or debt bondage, child exploitation, criminal exploitation, descent-based slavery, domestic servitude, forced & early marriage, forced labour, human trafficking and sexual exploitation.

### Organisation structure

This statement applies to tp bennett LLP (referred to as 'tp bennett') and its wholly owned group undertakings including tp bennett Services Limited. All group entities are registered in England and Wales.

tp bennett Services Limited, a subsidiary entity wholly owned by tp bennett LLP (indirectly via a holding company), employs and provides the services of staff to tp bennett LLP. These staff are engaged in the provision of client service delivery, administration, and central support for the benefit of the business of tp bennett LLP. All of our employees are based in the UK.

### Our business

We are a leading UK design practice founded in 1921 by Sir Thomas Penberthy Bennett, and deliver architecture, interiors, and planning consultancy to a wide range of cross-sector clients, both public and private, primarily in the UK. Our London, Manchester and Leeds studios are well known for their thriving, collaborative design environments where specialist sector knowledge, best practice and new ideas are shared amongst the wider practice, our clients, and external consultants.

**We had an annual turnover of £43 million in the financial year ending 31 March 2024.**

We assess the risk of modern slavery within our business and supply chain to be low given that we provide design (and not construction services), primarily in the UK. Further details are set out below.

### Our policies & governance

Responsibility for this statement and the Modern Slavery policy is held by the main board of tp bennett. Authority is delegated by them to our Chief Financial & Operating Officer (CFOO) and on to the Modern Slavery Compliance Lead and Modern Slavery Committee, which comprises representatives from our people & culture, sustainability, commercial, financial and legal teams. The committee meets quarterly to discuss progress on prescribed actions and any new risks identified.

Our **Modern Slavery policy** reflects our commitment to act ethically and with integrity in the way we run our business, how we conduct our business relationships, and how we will implement and enforce effective systems & controls to help prevent modern slavery in our business and supply chain.

We have a number of supporting policies, accreditations, management principles and procedures in place that underpin our commitment, and which we continuously review and update:

- We check the identity of all new employees, their eligibility to work in the UK and ensure that they are paid into a personal bank account in their name. We pay all of our people above the Real Living Wage, which is weighted for London accordingly. We are a certified Living Wage Employer with the Living Wage Foundation

- We have a whistleblowing policy that protects any employee reporting concerns where they wish to remain anonymous
- We use long-standing, trusted suppliers where possible, and are working closely with regular contractors (such as cleaning and security providers) to ensure their workers are also paid the Real Living Wage
- We are in the process of applying to become B Corp-accredited. This is an international standard of ethical business, which includes the protection of labour rights and responsible supply chain stewardship, and is aligned fully with the UN Sustainable Development Goals
- We provide staff with industry-specific compliance and management updates through the staff intranet page, which includes matters related to modern slavery

### Areas of risk

In our work to prevent modern slavery within our business and supply chains, we have identified and assessed areas of modern slavery risk as follows:

1. **Sector risk – Low:** Although we work in the construction industry, which is seen as high risk for labour exploitation, our role as designers means that we are not providing or procuring construction activities.
2. **Jurisdiction risk – Low:** We work primarily in the UK, with a small proportion of our projects overseas (including in the Middle East), where the risk of modern slavery is greater.
3. **Supplier risk – Low:** We have long-standing, trusted relationships with the majority of the suppliers and consultants with whom we work to deliver our services and manage our business. We are in the process of verifying compliance with the Act among those supply chain partners above a prescribed spend threshold. When we are appointing a new supplier or consultant, we use a due diligence process, which includes eligibility and compliance with various legal requirements, including modern slavery.

As part of our commitment to eliminating modern slavery, we have also considered the risk of modern slavery in respect of the supply of materials and products we specify for use on projects by clients and contractors. To minimise this risk, we use AdLib, which is a digital products & materials library designed and developed in-house. It requires suppliers' adherence to a responsible sourcing charter, and incorporates a supplier questionnaire that aligns to UN Sustainable Development Goals under social & ethical sustainability.

We continually keep under review our governance and risk management framework to ensure it enables us to effectively identify, monitor and manage key risks in the business, including modern slavery risk.

### Our supply chains and supplier adherence to our values

Our supply chain comprises of a) third-party professional consultants, and b) office & business support services for our London, Manchester and Leeds locations. Where possible, we seek to partner with long-standing suppliers whose values and standards align with ours.

We have used a sub-consultant due diligence questionnaire, which includes questions relating to modern slavery, when procuring suppliers, and are in the process of establishing a new supply chain management system that will implement enhanced due diligence checks for our existing and potential supply chain partners.

## Training

To ensure understanding of the risks of modern slavery in our supply chains and our business, we have rolled out a two-part, online learning and guidance programme for current colleagues, and an adapted version of this will be included in our induction programme for all new starters. Our modern slavery policy is available to staff on our intranet page.

Our aim is to create and maintain awareness and understanding of modern slavery for all our people, whether they encounter it in their work or private lives, and what to do if this happens.

## Progress on previous period's goals

Our goals for 2023/ 24 were purposely agile because we were eager to achieve what we had set out to do. Transcribed in brief from last year's statement, we undertook to:

- *Review, update, and republish our Modern Slavery policy*
- *Continue the development and implementation of a suitable supply chain management system that includes interrogation of our suppliers' anti-slavery commitments and their effectiveness*
- *Begin the incorporation of the above into our wider, ISO:9001-accredited QMS, and its policies and procedures*
- *Ensure that our commitment in relation to modern slavery is integral to planning wider practice initiatives and processes*
- *Continued engagement with initiatives in our profession and the wider construction industry who develop best practice in this area*

### Governance

The Modern Slavery Committee continues to meet quarterly in order to progress the goals set for the current period, and manage our compliance. In early 2024, the practice was successfully certified as a Living Wage Employer by the Living Wage Foundation. This has primarily been to create a mechanism for accountability regarding any permanent teams of contracted workers on practice premises, such as our cleaners and security guards.

### Learning

The first phase of practice-wide training has been rolled out, starting with a general introduction to the topic of modern slavery. Subsequent training will be given to cover the more specific topics of modern slavery in the design & construction industry, how the Act applies to us, how we are fulfilling our responsibilities, and how to access our policy and other useful information.

### Supply chain management

We have begun a phased programme to verify our suppliers' compliance with the Modern Slavery Act, independent of the wider supply chain management system currently under development.

### Goals for the next period

Following steady progress on the goals we set ourselves in 2023-24, we intend to take the following steps to build on our achievements during the next period:

- Review, update, and republish our modern slavery policy annually
- Continue the development and implementation of a suitable supply chain management system that includes examination of our suppliers' anti-slavery commitments. This will include a Supplier Code of Conduct or contractual commitment by suppliers to comply with all applicable laws, regulations and codes in place in relation to modern slavery
- Continue to develop modern slavery governance activities, such as training of staff, inductions for new employees, and external learning opportunities
- Continue to engage with initiatives in our profession and the wider construction industry who develop best practice in this area

### Our effectiveness in combating modern slavery & human trafficking

We have not received any reported concerns related to modern slavery in our own operations.

The steps we are taking and processes we are implementing to prevent modern slavery in our business and supply chains, and equipping our people with the knowledge and means to report any incidences they encounter, or suspicions that might arise, will we hope prove effective in achieving our own desire to play our part in the eradication of modern slavery. It will also add strength to the national and global cause.

We hope in due course to be able to measure our impact in this regard.


This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Modern Slavery Statement for the financial year ending 31 March 2024.

It was approved by the main board on 09 September, 2024.

It will be next reviewed in September 2025.



Nenad Manasijevic  
Principal Director



Mark Davies  
Principal Director

**Date:** 25 September 2024