

Modern Slavery Policy and Statement

Michael Murphy

18 April 2024

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Change history

Version number	Date of change	Change made by	Nature of and reason for change
0.1	July 2022	DMCH	Initial draft of policy for review
0.2	August 2022	DMCH/BJW	Initial review
1.0	April 2024	MJM	Final review

1 Modern Slavery Statement

- 1.1 Actica's mission is to help our clients deliver better, more secure, more efficient business services that ultimately make a difference to their customers and citizens of the UK.
- 1.2 Our business aims and ethics are incompatible with the human suffering and issues caused by modern slavery and Actica is fully committed to supporting its legal obligations and wider HMG objectives to eradicate modern slavery and human trafficking. We are taking steps to identify and mitigate the risk in our supply chains of goods and services, to protect vulnerable workers from exploitation and ensuring we do not inadvertently fund criminal activity.
- 1.3 This statement will help explain the steps we have taken to prevent modern slavery in Actica supply chains, and to be transparent about the areas where we need our suppliers to improve. Tackling the risk of modern slavery is not a quick process and will require continuing commitment and effort over time. We have set ourselves some initial goals and we will report our progress in future statements and update as our strategies evolve and we learn more about the risk of modern slavery in our supply chains.
- 1.4 We have completed the government-developed Modern Slavery Assessment Tool (MSAT) which is the starting point in helping understand our current approach to mitigating risks of slavery and will form the basis for identifying actions required in improvement plans.
- 1.5 Initially we are focusing on carrying out an assessment of our supply chain, to both map out the suppliers and also identify areas for more investigation using a tailored risk assessment tool.
- 1.6 We will also be incorporating risk assessments into new procurements to enable us to understand where there might be high risks at the outset and ensure we can monitor and reduce the risk of slavery occurring. We will continuously review and improve our policies and process guidance with input from stakeholders. This will help us shape our future strategy and prioritise our approach, helping identify where we should focus on more detailed mapping of the supply chain or address specific high-risk criteria.
- 1.7 Training will be developed for both commercial staff and wider stakeholders within the company, promoting wider social value and modern slavery awareness.
- 1.8 Actica is a member of various industry bodies where it will be possible to share best practice and collaborate with other organisations to present a joined-up approach.

Signed:  Dr Michael Murphy, Managing Director

18 April 2024

2 Organisation, commercials and supply chains

2.1 Overview

2.1.1 Actica is an SME focussing on delivery of high value technical consultancy into the public and private sector primarily for customers located and operating in the UK.

2.1.2 We provide our services in a number of ways but mainly by colocation of our staff with our customers including as part of blended teams working with other 3rd party organisations.

2.1.3 Actica operates from a single office located in Surrey Research Park, Guildford and employs around 230 people, the majority as consulting staff. Most of our work is carried out on a hybrid basis.

2.2 Commercial structure and supply chains

2.2.1 The administration function within Actica is responsible for overseeing the procurement process and ongoing management of contracts. Functions within the business are permitted to purchase small items/consumables up to a value of £10,000 with permission of a Director. All other procurement has to be signed off by the Managing Director.

2.2.2 Our contracts are awarded by competition between potential suppliers unless there are compelling reasons or constraints on the service/product being purchased as to why competition cannot be used.

2.2.3 There are 142 currently active contracts and the total spend in FY2022-23 was £11.4M, divided across a number of sectors as in the table below:

Sector	Number of Active Contracts	Spend FY2022-23
Facilities	6	£75K
Goods	7	£53K
Membership	7	£12K
Provision of Services	31	£520K
Recruitment	12	£368K
Subcontractors	70	£10.3M
Training	7	£94K
Travel	2	£2.5K

Table 1 – Actica Supply chain analysis

2.2.4 Actica sources more than 95% of its services from UK-based organisations.

- 2.2.5 The majority of contracts are used to supplement the internal Actica workforce on delivery of consultancy, all people supplied are individually identified, are UK nationals and subject to National Security Vetting. For these contracts we consider the risk of modern slavery to be negligible.
- 2.2.6 We are currently carrying out a review of the remaining contracts in the supply chain following on from an initial risk assessment.

3 Policy Statement

- 3.1 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors and suppliers.
- 3.2 Actica Consulting strictly prohibits the use of modern slavery and human trafficking in our operations and supply chains. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains.
- 3.3 Actica is committed to assuring in our organisation and supply chains as far as is possible:
- a. Adherence to local and national laws
 - b. Freedom of workers to terminate employment
 - c. Freedom of movement
 - d. Freedom of association
 - e. Prohibition of any threat of violence, harassment and intimidation
 - f. Prohibition of the use of worker-paid recruitment fees
 - g. Prohibition of compulsory overtime
 - h. Prohibition of child labour
 - i. Prohibition of discrimination
 - j. Prohibition of confiscation of workers original identification documents
 - k. Provision of access to remedy, compensation and justice for victims of modern slavery
- 3.4 Actica will support these principles through the processes outlined in this document, effective communications and where appropriate, training, resourcing and collaboration of effort with other external parties and stakeholders.
- 3.5 We expect that our suppliers will hold their own suppliers to the same high standards.

4 Commitments on Modern Slavery and Human Trafficking

- 4.1 Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.
- 4.2 Actica is a company that expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:
- a. We have a zero-tolerance approach to modern slavery in our organisation and our supply chains and will implement a set of activities that will continually monitor for infringements to this policy.
 - b. The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate, or fail to report any activity that might lead to, or suggest, a breach of this policy.
 - c. We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.
 - d. We take a formal risk-based approach to our procurement and contracting processes and keep them under review. We will assess the supply chain, and carry out a risk assessment of all existing and future contracts to determine via a structured method the level of risk of modern slavery on a low, medium, or high basis.
 - e. For those contracts assessed as at high or medium risk, we will carry out further detailed assessments to determine whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties.
 - f. For those contracts assessed as high risk using our risk-based approach, we will also consider writing to suppliers requiring them to make specific undertakings in respect of combating modern slavery and trafficking.
- 4.3 Consistent with our risk-based approach we may require:
- a. Employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with the Modern Slavery Act 2015 and a commitment against Human Trafficking
 - b. Suppliers engaging workers through a third party to obtain those third parties' agreement to adhere to the Modern Slavery Act 2015
- 4.4 As part of our ongoing risk assessment and due diligence processes for those contracts assessed as high risk, we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with the Modern Slavery Act 2015.

- 4.5 We will put in place formal escalation routes for staff if there are concerns of or reports of breaches of this policy. Initially these will be sent to the Actica Anti-Corruption Officer and will be investigated within 5 working days to determine what further actions are required.
- 4.6 If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated within agreed timescales and whether it might represent the best outcome for those individuals impacted by the breach to terminate such relationships.
- 4.7 Actica will also commit to a number of other measures within procurement and contract management that will reduce the risk of Modern Slavery within the supply chain, including:
- a. Carrying out due diligence on new contracts, including confirmation for large contracts (over £500K), that organisations have suitable Modern Slavery statements available indicating their commitments in this area;
 - b. Prohibiting any organisation known to have been convicted of child labour, human trafficking or other breaches of the Modern Slavery Act to enter into a contract with Actica;
 - c. Carrying out assurance checks not less than annually during the life of the contract;
 - d. Prompt payment of the contract invoices under the agreed terms (usually 30 days);
 - e. Putting in place a training and awareness programme for relevant staff, plus an information page on the Actica internal intranet wiki;
 - f. Integrating this policy with a number of social value activities and commitments already active within Actica;
 - g. Setting a number of goals and KPIs that will allow Actica Senior Leadership to monitor and measure the effectiveness of this policy, and support an agreed programme of continuous improvement.

5 Risk assessment and due diligence

5.1 Risk assessment methodology

- 5.1.1 All existing active Actica contracts have been assessed using the modern slavery risk assessment tool. All new contracts will also be assessed prior to contract acceptance/signing and any necessary further actions carried out.
- 5.1.2 The risk assessment correlates an assessment of the likelihood of there being a modern slavery risk for a particular contract (e.g. by assessment against available information about the contract organisation, location, type of service, and historical evidence, using sources such as [globalslaveryindex.org](https://www.globalslaveryindex.org)) plotted against the financial size of contract, to provide a measure of impact.
- 5.1.3 Due to the nature of Actica's business, any contracts where we employ subcontractors whose staff working for Actica are individually identified, UK nationals and/or hold UK HMG security clearance are automatically be considered low risk.
- 5.1.4 This gives an ultimate risk rating for each contract using a 5x5 grid from low to high.
- 5.1.5 Low risk contracts are assumed to be within tolerance and although reviewed annually are not further actioned.
- 5.1.6 Any medium and high-risk contracts are then actioned as described in Section 4.

6 Training and Awareness

- 6.1 To ensure a high level of understanding of the risks of modern slavery and wider social value awareness, Actica is committed to promoting learning by offering training to all our relevant staff. Training is not confined to staff responsible for procurement, however, and we will promote wider learning to our staff managing operational contracts by:
- a. creation of a modern slavery information page on the Actica intranet wiki to help staff identify any potential risks or issues
 - b. incorporating modern slavery and social value into induction training for new staff
 - c. looking at collaboration opportunities to share lessons and best practice with other similar organisations through the membership of trade bodies

7 Goals and Key Performance Indicators

7.1 We have started our early focus on assessment of the existing Actica supply chain to gain transparency and insight into our most important contracts.

7.2 The next stage is about developing internal awareness, training and working with our suppliers and analysing risk assessment results, including monitoring improvement plans and expanding the assessment approach to new contracts.

7.3 Our strategy will evolve as our knowledge of our supply chains and best practice develops, and future goals and KPIs will be updated or developed to reflect this.

7.4 We will start to take action to identify, mitigate and manage modern slavery risks in supply chains in FY 24-25 and KPIs have been developed based on this initial activity.

7.2 Key Performance Indicators (KPIs)

7.2.1 KPIs have been developed to measure effectiveness, including staff training, action plans for monitoring risks and checks on supplier and payment performance.

KPIs

Risk assessment and management

7.2.2 KPI: Risk Assessments for all new procurements above £500,000 threshold by Q4/24.

7.2.3 KPI: Detailed mapping and assessment of existing Actica supply chain complete by 31/10/24.

Due diligence processes

7.2.4 KPI: All high or medium risk existing contracts will be investigated by 31/12/24.

7.2.5 KPI: Actica commits to the HMG's prompt payment code to pay all undisputed and valid invoices within 30 days.

Training and awareness

7.2.6 KPI: All relevant staff to have completed modern slavery training.

7.2.7 KPI: Modern slavery elements to be included within the new staff induction briefing

Assurance.

7.2.8 KPI: Risk register of actions to be developed to show modern slavery improvement plans within the next 12 months to end 07/25

7.3 Integration with Procurement

7.3.1 Actions to monitor and mitigate risks of modern slavery should also be incorporated into the Actica procurement and commercial processes.

7.4 Goals

7.4.1.1 This section provides an overview of our performance against the outcomes set out in the government’s MSAT toolset. Some goals have already been completed, and some will be monitored throughout FY 24-25 and beyond as we see our Goals and KPIs evolving.

Goal	What we’ve done
Appoint an anti-slavery advocate at director level to help oversee activity and increase awareness of action to take	Complete – this is the Anti-bribery and Corruption Officer
Develop KPIs to help us understand whether the action we are taking is working well and where we need to improve	Complete – we will monitor these over FY24-25 and then review as part of continual improvement
Review, and where relevant, amend procurement policies to incorporate MS statements	Ongoing – this is underway.
Begin contract risk assessments to ensure action plans are targeted.	Ongoing – this is underway
Investigate, analyse and take action where required for all Medium and High-risk suppliers	Ongoing – this is underway
Participate in training and awareness	All staff briefed at induction now. Additional training to be identified, an updated page on the internal Actica wiki to be created

8 Governance, Reporting and Review

- 8.1 This policy, documentation and processes are owned by the Actica Anti-Corruption Officer
- 8.2 The KPI reports, incidents and risks will be presented not less than biannually to the Actica Operations Board.
- 8.3 This policy is to be reviewed by the Board of Directors
- a. annually;
 - b. following any significant change to relevant legislation;
 - c. following any incident to which this policy applies.
- 8.4 All changes are to be authorised by the Actica Managing Director on completion of amendments.