

# Modern Slavery and Human Trafficking

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## Introduction

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Building Design Partnership (BDP) Ltd's modern slavery and human trafficking statement for the financial year ended 30 June 2020.

## Organisational Structure

BDP is a major international practice of architects, designers, engineers and urbanists founded in 1961. Our multi-disciplinary teams produce integrated, holistic and sustainable design solutions across a wide range of sectors including education, healthcare, heritage, housing, leisure and culture, retail, science, research and technology, sport, transport, urbanism and workplace.

BDP works from several locations in the UK and also from studios in Dublin, Rotterdam, Abu Dhabi, Shanghai, New Delhi, Singapore and Toronto. In March 2016, BDP combined forces with Japan's leading engineering practice Nippon Koei to form an integrated design group of genuine international reach.

A group structure is in place with BDP being the operational company that undertakes all the operations of the group, either directly or through its subsidiaries and associates.

BDP Holdings is not required to produce a slavery and human trafficking statement as it is a holding company only and does not supply goods or services.

## Our Anti-Slavery and Human Trafficking Policy

Slavery is defined as ownership exercised over a person or where individuals are coerced into providing their services or do so under threat of a penalty. Human trafficking is defined as arranging or facilitating the travel of individuals with a view to exploiting them.

Slavery and human trafficking are acknowledged to be a global problem. BDP is committed to taking steps to ensure that slavery and human trafficking are not taking place in our business or supply chains.

Our commitment to preventing slavery and human trafficking extends to all individuals working with or for BDP at all levels and grades, including directors, senior managers, staff, sub-consultants, contractors, seconded staff, agency staff, agents or any other person associated with us or any of our subsidiaries or their employees as part of our supply chain.

If our staff become aware of an issue either within BDP or in our supply chain, we aim to ensure that they feel able to raise the matter internally with their Director or Head of Studio. Should this not be the case, the matter can be raised with the Director of HR or Studio HR representatives.

Our [Whistleblowing Policy](#) also gives the option of raising the matter externally and staff also have access to an external whistleblowing hotline where concerns about modern slavery and human trafficking, as well as other public interest concerns, can be raised anonymously. Provided the concerns were raised in good faith, staff using whistleblowing channels will be supported even if those concerns prove to be unfounded.

BDP has a number of policies which aim to minimise the risk of modern slavery in our supply chain:

- Responsible Procurement Policy
- [Anti-Bribery & Corruption Policy](#)
- Equality, Diversity & Inclusion Policy

We have a fair and transparent recruitment process where applicants are judged on their qualifications and experience and aim to pay fair market salaries. As a RIBA chartered practice, we participate in the RIBA annual benchmarking survey, an element of which reviews average salaries across the architecture profession. BDP is also a Living Wage Employer, accredited by the Living Wage Foundation.

## **Risk Assessment**

As part of our wider governance and risk management framework, we undertake periodic risk assessments to identify the key risks in our business.

Whilst we recognise that the construction sector is regarded as high risk in terms of labour exploitation, as a design practice, we are not directly involved in construction activities. However, should our staff witness any exploitative practices whilst visiting construction sites, these can be escalated using the methods outlined in the previous section.

Although the majority of our projects are situated in the UK which has strong anti-modern slavery legislation, we do have projects in countries where this may not be the case. We intend to conduct further work to identify any risks associated with projects in countries with weaker anti-slavery provisions.

Our key suppliers are sub-consultants (ranging from individuals to large international practices) who we engage to provide technical and professional services on our projects. They play a vital role in supporting our projects and our reputation depends on the quality of services they deliver. We seek to ensure that we only work with sub-consultants who share our both commitment to quality and our ethics and values. As they are generally highly skilled professionals, we regard them as being at low risk of exploitation.

We have started to review our other (non sub-consultant) supply chains and have been able to confirm that BDP's largest suppliers (in terms of spend) are predominantly related to professional services, IT costs and premises costs such as rent and business rates. The risk of modern slavery and human trafficking in these types of supplier is considered to be low. We intend to conduct further analysis of our suppliers to ensure we have detailed supply chain profiles for each of our studios.

## **Due Diligence**

Our procedures for selecting sub-consultants, service providers and suppliers align with our commitment to equality, diversity & inclusion and human rights, including our commitment to ensuring that slavery and human trafficking does not take place within our business or supply chain.

We use pre-qualification checklists when selecting potential sub-consultants and suppliers and when reviewing our existing supply chain partners. The checklists align with our own values and standards, for example our sub-consultants' pre-qualification checklist covers all aspects of policy and business activities, including specific questions relating to the Modern Slavery Act 2015.

In the event that a contractor, sub-consultant, agency or other member of our supply chain was suspected of engaging in or supporting slavery or human trafficking, an investigation would be undertaken and we would consider our relationship with them based on the results of that investigation and whether a robust action plan was put in place in response.

Action in this area would be driven by our Chief Executive, who is fully supported by the BDP Board of Directors and the Executive Management Group.

## **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in the organisation, BDP's mandatory training programme includes an 'Anti-Slavery and Human Trafficking Policy' module.

New starters and existing staff from all functions and locations are required to complete the training via an online training portal and any non-completion is followed up by senior management.

## **Next Steps**

In the next financial year, we will:

- Conduct a more detailed risk assessment with external support where necessary
- Do further work on our supply chains
- Consider putting in place KPIs to measure the effectiveness of our anti modern slavery and human trafficking procedures

## **Responsibility for the Policy**

For the purposes of this policy, the Chief Information Officer will have primary responsibility for the regular review and update where appropriate. The responsibility for the appropriate and effective application of the policy across each studio is with the Studio Chair (UK) or Studio Leader (International).

This statement has been approved by BDP's Board of Directors.

This is BDP's Modern Slavery and Human Trafficking Statement and as chief executive I commit myself and the company to it.

Signed



John McManus

Chief Executive

Date: 4 January 2021