



ICAEW MODERN SLAVERY STATEMENT

November 2024



WHAT IS MODERN SLAVERY?

Modern slavery as defined in the Modern Slavery Act 2015 (the Act" or "MSA") includes servitude and forced and compulsory labour. It exists where *"a person" holds "another person in slavery or servitude or forces another person to undertake compulsory labour, where the person knows or ought to know that the other person is being held in slavery or servitude or the person knows or ought to know that the other person is being forced to perform compulsory labour."*

Modern slavery is an international crime affecting over 50m people around the world, and over 100k in the UK. This growing global issue transcends age, gender, and ethnicities. It includes victims trafficked from overseas and vulnerable people in the UK who are forced illegally to work against their will in many different sectors such as agriculture, hospitality, construction, retail and manufacturing. The key to identifying it is whether there exists an element

of coercion. If the person or employee can leave easily and without threat to themselves or their family then, irrespective of whether they receive poor wages or work in an unsafe environment, or for long hours, it would not constitute slavery, servitude or forced and compulsory labour.

The Act requires commercial organisations supplying goods or services with a turnover of above £36m to prepare and publish an annual "Slavery and Human Trafficking Statement". The statement must set out the steps an organisation has taken, if any, during its financial year to ensure that slavery or human trafficking is not taking place in its supply chain. It also indicates what an organisation plans to do.

Set out here is ICAEW's statement for the financial year 2024.

ICAEW'S ACTIVITIES IN RELATION TO MODERN SLAVERY IN 2024: AN OVERVIEW

The introduction of changes in our supplier onboarding and contract management processes in 2023 continue to provide safeguards to our business around modern slavery and provide a mechanism for proportionately reviewing modern slavery within our supply chains.

All staff authorised to procure goods and/or services continue to receive and have access to procurement training which includes specifically, modern slavery.

ASSESSMENT

Our two-tier modern slavery assessment process has been developed to provide a risk-based approach to our obligations in monitoring modern slavery in our supply chain. The first tier assesses the location of the supplier and whether the services they offer fall within one or more of the pre-defined risk categories.

Where a supplier is located in a territory that is deemed high risk in accordance with the Freedom House Status and the Corruption Perception Index or provides goods or services that fall within the risk categories identified, a second-tier assessment is conducted. The second-tier assessment requires a supplier to complete a detailed due diligence questionnaire centred around modern slavery. The information gathered enables us to review the gender and nationality split of staff, and the internal procedures that the supplier has in place to prevent slavery and human trafficking. Responses provided within the questionnaire are compared against the supplier's modern slavery statement to ensure that the information is consistent.

This process has been enhanced in 2024 with additional indemnities to be requested in some circumstances. We have assessed our main modern

slavery related risks in our supplier base to be within our suppliers operating outside the UK.

Additional obligations are placed on high-risk suppliers, which may include but are not limited to the insertion of more robust modern slavery clauses into the agreement, obtaining approval to contract with the supplier from ICAEW senior management, and conducting a requirement to re-affirm their compliance with their own Modern Slavery Statement. These obligations are designed to promote the implementation of strong internal practices and controls, ensuring full compliance with Modern Slavery legislation. No second-tier assessments were required in 2024 (to November).

DUE DILIGENCE

A growing number of organisations are requiring their suppliers to confirm they have modern slavery clauses in their contracts to provide evidence of their commitment to monitor the behaviour of their suppliers during the contract term.

Additional modern slavery clauses have been added to our contracts where relevant to establish a strong framework to identify incidents of modern slavery, and to protect ICAEW from any potential risks associated with it.

TRAINING

In addition to targeted training for our staff who procure goods and services, mandatory "test your knowledge" modern slavery training is issued to all staff to complete on an annual basis.

For ICAEW members, we update the content on the online resource hub with guidance and advice on aspects of modern slavery which are of direct relevance to them, and their businesses.

THE UNITED NATIONS (UN) SUSTAINABLE DEVELOPMENT GOALS (SDGS)

In 2016, ICAEW endorsed the UN SDGs and our commitment to these goals remains unwavering. This means that increasingly more of our corporate efforts are being directed towards making a meaningful contribution to the achievement of the Goals we can influence.

Our efforts to ensure there is no modern slavery in our supply chain underline our commitment to SDG 8 and target 8.7, in particular.

CURRENT GLOBAL CHALLENGES

The UN has reported a significant increase in modern slavery over the past five years. Although there is currently no specific evidence directly linking modern slavery to any particular circumstances, it is important to recognise this upward trend and acknowledge that global challenges like climate change, geo-political conflict and financial crises can contribute to exacerbating the situation.

GOAL 8.7 OF THE UNITED NATIONS SUSTAINABLE DEVELOPMENT GOALS

A target for member states to meet by 2030.



To eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms.

ICAEW MODERN SLAVERY TRANSPARENCY STATEMENT NOVEMBER 2024

SCOPE

This statement has been published in accordance with section 54(1) of the Modern Slavery Act 2015 (the 'Act' or 'MSA'). It sets out the steps that ICAEW has taken to prevent modern slavery and human trafficking within its business and supply chains.

ORGANISATIONAL OVERVIEW & STRUCTURE

ICAEW (The Institute of Chartered Accountants in England and Wales) was incorporated by Royal Charter RC000246 in 1880, with its registered office at Chartered Accountants' Hall, Moorgate Place, London EC2R 6EA UK.

WHAT WE DO

ICAEW is a world leading professional membership organisation that promotes, develops and supports more than 170,000 chartered accountants and 39,000 students worldwide. We provide qualifications and professional development, share our knowledge, insight and technical expertise, and protect the quality and integrity of the accountancy and finance profession. All that ICAEW does and is responsible for - the provision of education and training, the maintenance of professional standards, and delivering technical excellence in the public interest - is defined by its Royal Charter.

WHERE WE ARE

We operate in 12 countries including the UK. Employing over 800 staff, mostly in the UK, we also have representative offices and presence in Belgium, Cyprus, the UAE, Saudi Arabia, China (including Hong Kong), Malaysia, Indonesia, Singapore and Vietnam. The focus of our international presence is to help raise the profile of ICAEW overseas with members and key partners, identify thought leadership opportunities, and stay up to date with local business issues. For the purposes of the Act, our offices, and representative offices, are part of our supply chain.

HOW WE ARE GOVERNED

ICAEW is governed by its Council, which is ultimately responsible for ensuring that ICAEW meets the objectives set out in our Royal Charter. Council carries out this responsibility through the review and approval of strategy, operational plans and budgets proposed by the Board. The Board acts under delegated authority from Council and is responsible for all matters relating to the development and implementation of ICAEW strategy (including the review of risk), policy, operational plans and all matters related to ICAEW resources.

For further details on our structure and our governance please visit our [website](#)

OUR COMMITMENT

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains, or in any part of our business. This statement and our policy reflect our commitment to acting ethically and with integrity in all our business relationships, and to implementing and enforcing effective systems and controls which address the risks of modern slavery and human trafficking anywhere within our business and supply chains.

We will continue to implement appropriate controls across a number of areas within our business, including supplier policies, contractual processes, training and reporting, in addition to recruitment and employment. As part of our efforts to identify and mitigate the risks of modern slavery and human trafficking, we make the following commitments:

2023/24	COMMITMENT	PROGRESS
SUPPLIERS	Clearly highlight our expectations of business behaviour to our suppliers	Additional standard contractual clauses now form the basis for contracting with suppliers
	Look to contract with entities that have stated anti-slavery and human trafficking policies and procedures in place	A two-tier risk-based assessment identifies suppliers where there is a greater chance of modern slavery occurring, and a more rigorous due-diligence process is applied
POLICIES	Encourage the reporting of concerns and provide appropriate protection for whistle-blowers	ICAEW's Whistleblowing Policy was updated at the start of 2024, followed by mandatory eLearning training that was rolled out to all staff in 2024
OTHER	Continue to provide learning resources to our members on the latest developments in modern slavery legislation and good practice	The Modern Slavery hub is updated when new material is available.

We also believe in the importance of ethical behaviour for our members, our people, our suppliers and broader society. Our ethical behaviour, both actual and perceived, is fundamental to maintaining ICAEW'S reputation, promoting trust and inspiring confidence in it and its members. Ethical behaviour is also part of our identity.

Our Business Values and Standards of Behaviour Code is set out [here](#)

This code outlines ICAEW'S values and the standards of behaviour expected of all who represent it, including contractors, consultants, agents and suppliers.

OUR POLICIES

MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

ICAEW's policy encourages the reporting of concerns by staff and emphasises appropriate protection for whistle-blowers.

ICAEW's Modern Slavery and Human Trafficking Policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners. The policy is highlighted to all new staff during their probation period with a requirement they have to sign and say they have read, understood and agree to it. The policy states that our zero- tolerance approach to modern slavery will be communicated to suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

In addition, we may terminate our relationship with individuals and organisations working on our behalf if they breach this policy.

We will be monitoring the use and effectiveness of our policy, dealing with any queries about it, and considering internal control systems and procedures to ensure these are effective in countering modern slavery. We ask that our Modern Slavery and Human Trafficking Policy is understood and applied in connection with the following additional related policies and framework:

- Whistleblowing
- Anti-fraud, bribery, and corruption (includes corporate gifts and hospitality).
- Tendering policy and procedure.
- Third-party contracts and agreements guidance and policy.
- Enterprise Risk Management Framework.
- Reporting suspicions of money laundering
- Our Business Values and Standards of Behaviour Code

SUPPLIERS

ICAEW understands that the nature of our relationships with our suppliers can be influential and can therefore serve as a trigger for responsible action in these supply chains and an opportunity to influence positive change.

The supply chain that supports our business comprises a wide range of suppliers, from smaller businesses to global companies, across many jurisdictions, including those where there is a higher risk of forced labour. Our supply chain includes products and services for IT hardware and software, office refurbishment, fit out and maintenance, recruitment agents through to outsourced services such as cleaning, catering, security and reception.

We will continue to work with our people to further refine the identification of specific modern slavery hotspots in our procurement chain, both in the UK and internationally.

We continue to request assurances from suppliers, where appropriate, that the suppliers comply with the Modern Slavery Act 2015 and that they warrant that they have not committed, and are not being

investigated, or are aware of any circumstances which may lead to an investigation for any allegations of a modern slavery offence. The clause is now included in all newly entered into supplier contracts.

In 2024 we updated our tendering policy and associated documentation to further address issues of modern slavery. As part of our due diligence procedures our suppliers are required to have their own due procedures for their direct subcontractors, suppliers and other participants in their supply chains, to ensure that there is no slavery or human trafficking in its supply chains.

We will not support or deal with any business knowingly involved in slavery or human trafficking.

c.£87m

2023 SUPPLY CHAIN SPEND

1,312

**NUMBER OF SUPPLIERS
USED BY ICAEW IN 2023**

EMPLOYEES

We are committed to paying people fairly and properly for the work that they perform. As referenced above, our Business Values and Standards of Behaviour Code apply to all staff.

Strong values and ethical behaviour have been at the heart of our organisation since its foundation in 1880. These values provide a framework for all ICAEW colleagues.

OUR VALUES

Chartered accountants are talented, ethical and committed professionals. There are more than 1.8m chartered accountants and students around the world, and more than 200,000 of them are members and students of ICAEW.

We have a long history of serving the public interest and we continue to work with governments, regulators and business leaders around the world. And, as a world-leading improvement regulator, we supervise and monitor c12,000 firms, holding them, and all ICAEW members and students, to the highest standards of professional competency and conduct.

We are proud to be part of Chartered Accountants Worldwide, a global network of 750,000 members across 190 countries, which promotes the expertise and skills of chartered accountants on a global basis, and The Global Accounting Alliance.

By sharing our insight, expertise and understanding we can help to create a world of strong economies and a sustainable future for all.

Our staff are appraised and rewarded on our ways of working and our values - these are Insight, Initiative and Integrity. We promote inclusivity, diversity and fairness and we give talented professionals the skills and values they need to build resilient businesses, economies and societies, while ensuring our planet's resources are managed sustainably.

EMPLOYEES

RECRUITMENT

The majority of our workforce is employed on a permanent or contract basis. All employees who join the firm are subject to checks, including the verification of identity, right to work, references and evidence of qualifications where appropriate. Similar checks are also undertaken for contractors. We produce and maintain a list of approved recruitment agents.

WHISTLEBLOWING

We encourage all our staff, clients and other parties to report any concerns they may have in relation to a risk, malpractice or wrongdoing that affects others such as clients, staff, the firm, suppliers or the public. Our whistle-blowing policy and procedure are designed to ensure that people can make disclosures without fear of retaliation.

DURING FINANCIAL YEAR 2023

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**REPORTS BY ICAEW IN RELATION
TO MODERN SLAVERY**

FURTHER ACTIVITIES

ACTIVITIES FOR STAFF

ICAEW is identifying suitable, accredited and robust training materials to deliver to staff specifically involved in purchasing, procurement and contracts.

ACTIVITIES FOR MEMBERS

ICAEW has a body of resources on modern slavery for its members and has a dedicated online resource hub www.icaew.com/modernslavery for them on this area. This resource area has been further built out, with podcasts, videos and further content highlighting the vital role members play in eradicating more slavery across the planet.

If you have any further questions in relation to ICAEW's statement on modern slavery, contact: Richard.Spencer@icaew.com

Chartered accountants are talented, ethical and committed professionals. ICAEW represents more than 208,000 members and students around the world. 99 of the top 100 global brands employ ICAEW Chartered Accountants.*

Founded in 1880, ICAEW has a long history of serving the public interest and we continue to work with governments, regulators and business leaders globally. And, as a world-leading improvement regulator, we supervise and monitor around 11,500 firms, holding them, and all ICAEW members and students, to the highest standards of professional competency and conduct.

We promote inclusivity, diversity and fairness and we give talented professionals the skills and values they need to build resilient businesses, economies and societies, while ensuring our planet's resources are managed sustainably.

ICAEW is working towards becoming net zero, demonstrating our commitment to tackle climate change and supporting the UN Sustainable Development Goal 13.

ICAEW is a founding member of Chartered Accountants Worldwide (CAW), a global family that connects over 1.8m chartered accountants and students in more than 190 countries. Together, we support, develop and promote the role of chartered accountants as trusted business leaders, difference makers and advisers.

We believe that chartered accountancy can be a force for positive change. By sharing our insight, expertise and understanding we can help to create sustainable economies and a better future for all.

[charteredaccountantsworldwide.com](https://www.charteredaccountantsworldwide.com)
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* includes parent companies. Source: ICAEW member data February 2024, Interbrand, Best Global Brands 2023