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Modern Slavery Act Transparency Statement

Our approach to defeating slavery

Introduction from the Managing Partner

Our values are to be straightforward, confident, partnering and friendly in all that we do, and our response to modern day slavery lives these values out by:



paying at least the real living wage to all of our people;



acting ethically and with integrity in all our business relationships; and



enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our business or supply chains.

In relation to modern day slavery, we have a zero tolerance approach in every aspect of how we do business.





Our structure and business

We are one of the UK's leading independent pensions and financial services consultancies. We work alongside employers, trustees and financial services institutions, offering independent pensions, investments, benefits and risk consulting services, as well as data and technology solutions. The firm operates as an independent partnership employing c.1350 people in four UK offices in London, Glasgow, Edinburgh and Birmingham and a small number of personnel based in the US and Canada. We are a part of the Hymans Robertson group, with the ultimate parent being Hymans Robertson LLP. We have an annual turnover of c. £135 million.

Our subsidiary companies provide data analytics (Club Vita UK LLP, Club Vita LLP, CV Canada Ltd and Club Vita US, LLC), personal wealth financial services (Hymans Robertson Personal Wealth LLP) and investment management services for the UK retail advised sector (Hymans Robertson Investment Services LLP).

Given our role in the financial services sector, we believe that there is a low risk of slavery or human trafficking having a connection with our business activities. In particular, we do not rely on agency staff or subcontractors to provide our core services and products. But there is no room for complacency in that belief, so, amongst other things, we have taken the steps detailed below.

Our policies on slavery and human trafficking

The main policies and processes enforcing and supporting our approach to anti-modern slavery and human trafficking include:



Anti-Slavery and Human Trafficking Policy

The responsibility for preventing modern slavery within our firm starts with a top level commitment from our Management Board, but requires the engagement of our entire workforce to successfully achieve our goal of zero tolerance. We have therefore implemented an internal Anti-Slavery and Human Trafficking Policy to make our workforce aware of their individual obligations within the firm's anti-slavery framework.

Fair Pay

Hymans Robertson LLP is committed to ensuring that all directly employed and contracted staff receive fair remuneration for the job they perform. We are an employer committed to paying at least the living wage set each year by the [Living Wage Foundation](#). In addition, the firm offers enhanced maternity, adoption and paternity leave entitlement, available to every employee from day 1 of their employment and does not use zero hours contracts for any appointments.



Responsible Investment Policy

We are conscious of the asset managers, insurers and pension providers we engage with and their commitment to responsible investment. When the assets of our clients are invested, there is potential modern slavery exposure for our clients through the supply chains of the corporates they invest in. Our Responsible Investment Mission Statement reflects our commitment to make sure that investment decision-making properly and effectively considers the positive and negative impacts on people and the planet. In addition, our approach to addressing appropriate control mechanisms mitigates modern slavery (and other responsible investment related) risks to our clients. Modern slavery is one of four focus themes at the core of our ongoing dialogue with asset managers and other parties. We educate our clients on the issues surrounding modern slavery and how this can arise in their portfolios, as well as scrutinising the policies and processes of the asset managers, insurers and providers we work with. We take time to understand their position on responsible investment through data we gather from them and the subsequent engagements that take place. We engage with asset managers on specific issues that may arise in client portfolios, and we work closely to understand the proactive steps they are taking to mitigate the risks.





B Corp Certification

Hymans Robertson LLP certified as a B Corporation in August 2023. B Corp certification is verified by B Lab - a global non-profit network with a mission to inspire and enable people to use business as a force for good. It's a designation that a business is meeting high standards for social and environmental impact, that it has made a legal commitment to stakeholder governance, and that it's demonstrating accountability and transparency by disclosing this record of performance in a public B Corp profile. Our people policies, CSR, DEI and governance approach align closely with B Corp's standards and helped us above the 80-point 'minimum requirement' score in their impact assessment. We were delighted to certify with an overall score of 84.9.

A key feature of B Corp certification is the rigorous verification process conducted by B Lab, while our certification includes committing to transparency in our supply chains; implementing standards, policies, tools and programs to benefit all stakeholders and working to ensure an inclusive and diverse culture in our business.



Diversity, Equity & Inclusion Policy (DEI)

We're committed to promoting equality and fairness through equity and inclusion, respecting all aspects of diversity in our firm. Our DEI objectives and ambitions underpin our aim of being representative of the UK population, and are set out in our Diversity, Equity & Inclusion Policy. Our commitments include creating a nurturing environment and culture that allows everyone to feel safe, free to be themselves and to do their best work; and to provide career progression and opportunities for everyone, free from unconscious bias or other unintended barriers.

Our internal DEI Community Groups help raise awareness and build understanding of the different aspects of diversity, with our Allyship Programme supporting. We partner with a range of external bodies and networks to move forward with our ambitions. We've also implemented a wide range of internal policies to support our DEI values. These include enhanced maternity, paternity and adoption leave; shared parental leave; other parental or carers' leave, hybrid and flexible working; and grievance and dignity at work. All our policies are regularly reviewed, including input from our DEI Community Groups.





Whistleblowing

Our firm encourages all its workers, customers and other business partners to report any concerns related to its direct activities or supply chains. This includes any circumstances that may give rise to increased risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to report any concerns or suspicions, without fear of retaliation. Our Whistleblowing Policy and Procedure complies with the Public Interest Disclosure Act 1998 (PIDA), which provides protection for workers who raise legitimate concerns about specified matter; and provides contacts for reporting a matter either internally or externally, including reporting to the Financial Conduct Authority. We also have a Speaking Up Policy, which aims to ensure we engender the right environment which encourages employees to challenge and speak up at work.



Employee Awareness

Hymans Robertson's employee handbook sets out all of our employment policies and principles. It includes our anti-slavery measures.



Recruitment

Most of Hymans Robertson's workforce is employed directly on a permanent or fixed term basis. All employees who join us are subject to checks to ensure they are genuine applicants operating as free agents with the required level of propriety. These include verification of identity, references, evidence of qualifications, residency rights, criminal and financial checks. In 2021 Hymans Robertson was awarded the ENEI (Employer Network for Equality & Inclusion) Gold Standard accreditation and has retained this accreditation ever since. This reflects the firm's successful performance against ENEI's TIDE (Talent, Inclusion and Diversity Evaluation) framework and its commitment to fair and inclusive recruitment.

For the few roles in our business which are filled by agency workers, we ensure that similar checks to those for workers are carried out. If using agency, we do this by obtaining written verification from the agency that the checks have been conducted and the outcomes are satisfactory. The agencies themselves will have been subject to our rigorous supplier relationship management process which includes due diligence on their organisation.





Suppliers

All supplier information and associated documents are recorded on a centralised internal system by the supplier Business Owners. New supplier entries trigger our formal supplier verification and due diligence process, which is supported by our Supplier Manager. A copy of our anti-slavery statement is on our website and is available to our suppliers, and we request and review a copy of their statement (where available), as well as undertaking a number of due diligence checks on them. We have also recently published a Supplier Code of Conduct which is also on our website and suppliers are directed to review this during the onboarding process. When we are appointing a supplier, there are key areas and questions our process mandates that the Business Owner must consider to ascertain whether there is an additional risk of slavery or human trafficking. These include country, sector, activity, business partnership, complexity, previous offender and pressure and low pay risks. In addition, where we engage suppliers on our own terms, these contracts contain clauses enforcing compliance with the Modern Slavery Act 2015.

We have recently reviewed and updated our due diligence questions to ensure they are up to date and cover the relevant legislation. We are also in the process of automating a number of areas in our supplier process including automation of approvals and the use of a supplier portal for the completion of due diligence questions. This portal will provide suppliers with a secure link to complete due diligence questions around a range of topics including those relating to modern slavery such as the country the service is delivered from and the type of industry. These answers are then recorded in our central supplier database in Microsoft Dynamics.





Training

Earlier this year we carried out targeted anti-modern slavery training with key stakeholders in the business from our Supplier Management, Human Resources, Facilities and New Business teams. These individuals were identified as working in areas that could benefit from enhanced training on modern slavery risk. The training covered an overview of the legislative landscape in the UK, how it applies to us as a firm and our anti-modern slavery process.

We will continue to provide training to mitigate risks of modern slavery in the business. We also ask our workforce to confirm their agreement and understanding to our Anti-Slavery and Human Trafficking Policy in our annual staff declaration.



Communication and enforcement of this statement

We communicate updates to this statement and our Anti-Slavery and Human Trafficking Policy to our staff using our internal intranet and ask our staff to confirm their agreement and understanding to these policies in our annual staff declaration. Any employee who breaches the Anti-Slavery and Human Trafficking Policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we have completed an assessment of the risks linked to modern slavery and the details of due diligence and/or other risk management processes we have in place, including identifying where modern slavery and any other labour issues are covered by the firm's policies. The core principles of this statement are built into our Supplier Code of Conduct which new suppliers are directed to during onboarding.

We must be satisfied that our suppliers meet the minimum requirements contained in our Supplier Code of Conduct as part of our onboarding process, otherwise they will not satisfy our due diligence process. We may terminate our relationship with any individuals or organisations in our supply chain if they breach our Supplier Code of Conduct. In addition, our standard supplier terms and conditions contain anti-modern slavery clauses, creating a contractual obligation on our suppliers to comply with the UK's anti-modern slavery legislation and report any relevant breaches to us.



Our Commitment

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group's statement on the prevention of slavery and human trafficking for the financial year ending 31 March 2024. It has been approved on 2nd September 2024 by our Management Board, on behalf of our Members, who will review and update it annually.



Shireen Anisuddin

Managing Partner
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