

# Modern Slavery Transparency Statement

The Institution of Civil Engineers (“ICE”) is committed to combatting modern slavery and human trafficking. This statement has been published in accordance with section 54(1) of the [Modern Slavery Act 2015](#) (the “Act”). It sets out the steps that the ICE Group has taken to prevent modern slavery and human trafficking within its business and supply chains. This Statement is applicable for the financial year ended 31 December 2023.

## Our business

The ICE is the world’s oldest professional engineering institution. It is a body incorporated by Royal Charter and is incorporated as a Charity with the Charity Commission in England and Wales (Charity No. 210252) and the Office of the Scottish Charity Regulator (Charity No. SC038629).

At 31 December 2023 the institution had over 97,000 members. It supports its members and its charitable activities through an extensive network of regional offices, branches, partnerships, and agreements of co-operation. The purpose of the ICE is to promote and advance civil engineering around the world. It seeks to lead the global infrastructure debate as well as to provide professionally qualified civil engineers who are then supported in their lifelong learning.

In common with many charities, the ICE has a wholly owned subsidiary Thomas Telford Limited, a company incorporated in England and Wales (Company Registration No. 02556636), which carries out non-charitable trading activities, including the publication of contracts, the provision of training and consultancy services, and the operation of an events and hospitality venue.

The ICE also owns the entire issued share capital of The Institution of Civil Engineers (Hong Kong) Ltd, a company incorporated in Hong Kong (Company Registration No. 1027904). The ICE is also an equal guarantor with the Institution of Structural Engineers to Structural-Safety Limited, a company incorporated in England Wales. The ICE has a branch in Dubai, in the United Arab Emirates, and Thomas Telford Limited has a branch registration in Hong Kong.

The ICE Group has offices in the UK, Hong Kong, and Dubai. In 2023, the ICE Group had a total global income of approximately £42.7m and employed an average of 348 employees, mostly in the UK. ICE Group activities are supported by members and other volunteers across the world. The ICE Group recognises the risks of modern slavery are higher in some parts of the world in which it operates and takes these risks very seriously.

## The ICE Group’s Supply Chain

The ICE operations require the use of an extensive range of suppliers. Whilst we expect our suppliers to uphold the rights of their workers, the ICE Group recognises that as a customer we can play a part in influencing the supply chain.

Main areas of supply chain activity include: catering supplies; recruitment; temporary staff; travel and accommodation; publishing and printing services; training providers; consultancy; building maintenance; cleaning; software and other IT services; and other professional services.

Whilst the ICE Group’s business and supply chains are not especially susceptible to modern slavery and human trafficking, the range of products we purchase and the number of countries in which we operate make for a challenging procurement landscape. The ICE is committed to trading ethically. The ICE Group will continue to support processes of due diligence to help combat modern slavery and human trafficking in our supply chain.

## Due Diligence Approaches

The ICE Group takes a multifaceted approach to the due diligence carried out on its supply chain.

### Procurement and supplier code of conduct

The supplier code of conduct, first introduced in 2021, sets out expected standards of policy and behaviour in respect of forced and child labour, fair treatment of employees and adherence to local wage and employment practice regulations. The code also sets out additional standards in respect of any bribery and corruption, data protection, avoidance of tax evasion and other ethical standards. All new suppliers are expected to sign up to the code of conduct as a prerequisite of being accepted as a supplier of the ICE Group or provide evidence that they have their own policies in place that are at least equivalent to our standards.

### Ongoing review

We review and keep under review the risks our supply chains may present with a particular focus on those suppliers with which we have had the largest expenditure. Many of the UK based suppliers are small consultancies or owner managed businesses, and are suppliers deemed to have a low risk with regard to modern slavery.

Suppliers based overseas have also been specifically considered, with ratings from [globalslaveryindex.org](https://globalslaveryindex.org) used to classify countries as low, medium, or high risk. Most of our overseas engagements are with legal and professional firms and are deemed to be low risk. Other services based abroad include longstanding relationships for IT support and office rentals. It is acknowledged that these may present a higher risk, which is considered when managing supplier relationships.

In addition to asking new suppliers, we have now largely completed the roll out of the supplier information and code of conduct process to all existing suppliers who were in place at the time the supplier code of conduct was introduced, achieving over 99% coverage of our supplier turnover in 2023.

### Whistleblowing policy

Our whistleblowing policy encourages our staff, members, and other parties to report any concerns they may have in relation to a risk, malpractice or wrongdoing that affects others such as staff, the ICE Group, suppliers, customers, or the public. Our whistleblowing policy and procedure are designed to ensure that people can make disclosures without fear of retaliation.

### Recruitment and employment

ICE Group recruitment policies are designed to ensure compliance with UK or relevant overseas employment laws, and we also encourage staff to report any concerns related to the activities of the organisation or its supply chain. Our HR team manage all recruitment activities with recruiting managers and only use reputable employment agencies and job boards to source candidates: both the ICE Group and its agencies carry out appropriate background checks.

We are committed to paying people fairly and properly for the work that they perform. 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 in the jurisdiction in which they are employed, references and evidence of qualifications where appropriate.

## Mitigation Plans

The ICE recognises the need to continually assess the risks of modern slavery and human trafficking. The ICE also recognises that there may be gaps in visibility of supply chains and limitations in the tools used to identify risks and that addressing these is a complex task.

We will continue to mitigate risks by:

- Implementing an anti-slavery policy or anti-slavery guidance, as appropriate.
- Ensuring staff awareness of these issues and the guidance and policy on how to manage them.
- Reviewing and identifying high-risk areas in our supply chain and ensuring mitigations are in place.
- Working with our suppliers, and taking action to strengthen supply chains, where necessary.
- Embedding awareness of the Modern Slavery Act through the use of appropriate training courses.
- Undertaking a risk assessment of any significant new markets in which the group seeks to operate.

## Effectiveness

The ICE has not directly received any reports of belief or suspicion of modern slavery or human trafficking in its business or supply chains. The information in the rest of this Statement sets out the measures the ICE has been implementing to ensure that modern slavery or human trafficking does not take place.

The statement above was approved by the Trustee Board of the Institution of Civil Engineers on 19 March 2024.