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# Modern Slavery Statement

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For financial year ending December 2023

MARCH 6, 2024

**Version 2.0**



## **The Company**

This statement applies to Clarion Insight Ltd and anyone working on behalf of Clarion in any capacity including employees at all levels, directors, officers, agents, associates, contractors and suppliers. The information included in the statement refers to the financial year 2023.

## **Company structure**

Clarion is a privately owned company, owned in equal shares by 3 Directors. Clarion has a leadership team that are involved in the day to day running of the business, but all financial and legal decisions are made by the Executive Directors.

Clarion operated from an office in Eagle Tower, Cheltenham, all employees, and associates are either hybrid or home workers.

Clarion Insight are a specialist consultancy who focus on improving organisational, team and individual performance through the transformation of relationships and ways of working. We have an enviable track record of successful delivery of both small and large-scale change and transformation programmes in some of the most exacting and sensitive environments. Demand for our services is consistently high throughout the year and is therefore not seasonal. Currently we supply our services through 3 'prime' organisations.

The labour supplied to Clarion in pursuance of its operation is carried out in the UK only.



## **Definitions**

Clarion considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse of the threat of abuse
- being dehumanised, treated as a commodity or being bought or sold as property
- being physically constrained or to have restriction placed on freedom of movement.

## **Commitment**

Clarion has a zero tolerance to modern slavery within its company, partners and supply chain.

Clarion acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The company understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

Clarion will make reasonable enquires to ensure that officers, employees, and workers have not been convicted of slavery or human trafficking offenses. This will be done through Baseline Personnel Security Standard (BPSS) checks which include a Disclosure and Barring Service (DBS) check.

Clarion does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.



No labour provided to the company in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The company strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the UK and exceeds those minimums in relation to its employees.

### **Supply chains**

In order to fulfil its activities, the main supply chains of Clarion includes (but is not limited to) those related to the supply of IT services and systems, personnel security, IT architecture services, accountancy and payroll, office supplies and catering. We understand that Clarion's first-tier suppliers are intermediary traders and therefore have further contractual relationships with lower-tier suppliers.

### **Potential exposure**

In general, Clarion considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless Clarion has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

### **Steps**

Clarion carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

Clarion has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

### **Policies**

Clarion has a Modern Slavery policy which further defines our stance.



## **Anti-Slavery Compliance Officer**

Clarion has an Anti-Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the Clarion's obligations. Clarion's Anti-Slavery Compliance Officer is the Head of People.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Signed: *Sarah Bell*

Print name: Sarah Bell

Job Title: Executive Director

Date: 6<sup>th</sup> March 2024



## Amendment History

Version	Date	Changes made	Made By
0.1	03/10/23	New statement	Penny H
1.0	06/10/23	Director approval of statement	Sarah B
1.1	07/11/23	Document information classification	Penny H
2.0	06/03/24	Review, update & Director approval	Mandy B