

Broadgate Estates (BE) – Slavery and Human Trafficking Statement 2017

Modern slavery and human trafficking are grave forms of human rights abuses. Broadgate Estates recognises the importance of respecting human rights and is committed to taking steps to prevent modern slavery and human trafficking in our business and in our supply chain.

This is our second annual slavery and human trafficking statement (“Statement”) pursuant to section 54(1) of the Modern Slavery Act 2015. This Statement sets out the steps we have taken during the financial year ended 31 March 2017, as well as the activities we have started to take to prevent modern slavery and human trafficking in our business and our supply chains. This Statement is specific to Broadgate Estates, a wholly-owned subsidiary of The British Land Company plc (“British Land”). British Land has also published its own Slavery and Human Trafficking Statement, which can be found here: britishland.com/msa.

About Broadgate Estates

As a Managing Agent, we spend service charge on behalf of our Clients. We manage a portfolio of mixed-used developments, landmark properties, and privately owned public spaces in the UK. Our services include property and asset management, occupier services, technology solutions, and consultancy.

Broadgate Estates has 460 direct employees (as at 31 March 2017), all of whom are UK-based and paid at or above the Living Wage Foundation’s Living Wage, an independently calculated wage based on the minimum amount that employees and their families need to live on.

Our supply chain consists of approximately 1,950 direct suppliers. In the last few years, Broadgate Estates in conjunction with British Land have invested heavily in our professional procurement team.

Our risk areas

We believe that our own employees are at low risk of modern slavery and human trafficking as the workforce consists primarily of office-based professional skilled labour, however, we purchase a significant proportion of the services required to undertake our business activities, including services related to property management. While the majority of our direct suppliers are based in the UK, these suppliers source some materials and services from around the world. Broadgate Estates considers its most significant risk areas in relation to slavery and human trafficking to be in its supply chain, particularly in the areas of procurement of materials and labour services in connection with property management.

We work closely with British Land and our Clients to use their Risk Maps to understand the risks associated with procurement of supplies and services we use in our supply chain including ‘Labour practices and fair play’. British Land by example is currently updating the Risk Maps to reference more directly human rights and the MSA. They plan to review these on a periodic basis, reflecting changes to the business and external risk factors.

Our policies

We have policies in place to protect our employees and their labour rights in our operations, including policies around working hours, payroll, and Right to Work checks. Our compliance with these policies is confirmed every two years by our internal auditor. British Land’s Human Resources Director is responsible for these policies. Development and implementation of these policies is led by the Head of Employee Relations.

Our corporate values centre around excellence, trust, and integrity. On joining the Company, each employee is provided with the Broadgate Estates Employee Handbook which sets our expectation that our employees maintain high standards when it comes to ethical business conduct, and a requirement that our relationships with competitors, suppliers and clients must be based on high standards of personal and professional ethics.

Our Employee Handbook also describes our confidential whistleblowing channel, which employees and third parties can use to report any concerns of unethical behaviour. Our whistleblowing policy is available on our Intranet.

British Land will undertake a review of its Employee Handbook to further strengthen its commitment to prevent modern slavery and human trafficking in the business and supply chains; these changes will be reflected in the Broadgate Estates Employee Handbook. British Land will also issue new guidance to employees on how concerns can be reported through the whistleblowing mechanism; this guidance will also be provided to Broadgate Estates employees.

Reducing risk in our supply chain

Our supply chain is broad and includes both direct suppliers (e.g. cleaning, security and engineering) as well as some indirect suppliers (e.g. specialist contracting services).

We communicate our Client's and our social and ethical standards to our suppliers. And through the British Land Sustainability Strategy and related initiatives, we leverage our scale and scope to encourage more responsible supplier behaviours and practices.

Suppliers operate in line with BE's Supply Chain Charter, which requires that suppliers comply with relevant legislation for employment, health and safety, and working hours. In addition, suppliers shall prohibit child or forced labour, exclusive zero-hours contracts, and unpaid work for any kind. The Charter also sets out that suppliers shall respect the rights of freedom of association and collective bargaining, follow working hours that comply with benchmarking industry standards, and make grievance procedures fully available to staff.

This year our Parent British Land is updating their Supply Chain Charter to strengthen its commitment to take corrective and/or mitigating action if they suspect human rights and modern slavery abuses in our supply chains.

We respect the requirements of our Clients in relation to the standards and values they expect of us, and we have taken steps to cascade our Clients' labour requirements throughout our supply chain. All suppliers to British Land and British Land joint venture properties that we administer are required to adhere to the British Land Supply Chain Charter as part of their standard terms and conditions. With regard to the rest of our managed portfolio; all suppliers are put through a pre-qualification process in line with our Supply Charter and as required by our Clients.

We work with our suppliers to manage the risk of human rights violations in our procured labour. All of our suppliers are legally required to pay their employees the UK National Living Wage, and we work with our service partners to pay the Living Wage Foundation's Living Wage.

We also operate an online supplier portal that requires all suppliers with turnover over £36 million to upload a copy of their Slavery and Human Trafficking Statements on an annual basis.

We have also strengthened our internal procedures in relation to procurement by screening and monitoring our supply chain. Anti-Bribery and Corruption checks are carried out to any new suppliers and the whole supply chain is screened and monitored by a 3rd party specialist company and we are notified if any of our suppliers is matched against a grid monitoring ethical, fiscal, or reputational issues.

Going forward we will strengthen our processes to allow us to monitor compliance with the Broadgate Estates Supply Chain Charter to assure ourselves that our key suppliers are compliant with the Charter. We will also arrange for training on human rights and how to spot abuses to relevant suppliers.

Training available to suppliers and staff

We provide ongoing guidance and training to support employee understanding of expected behaviours. We will continue our efforts to raise internal awareness of modern slavery and human trafficking with employees and contractors to educate them on how to identify and report suspected instances. We also intend to roll out targeted training for Procurement, HR and Compliance staff to reinforce these behaviours.

We also work with our suppliers to provide training on the MSA. This year, we provided MSA guides to our top 1,000 suppliers. This included a description of the requirements of the Act, as well as guidance on how suppliers can comply with the MSA. We will continue to identify opportunities to provide training to our suppliers around this topic.

Looking ahead

We recognise that responding to an issue as serious as modern slavery and human trafficking requires constant commitment and vigilance. Over the next twelve months, we will continue to seek opportunities to further reduce the risk of human trafficking and modern slavery in our operations or supply chain. We will continue to manage and report on the performance indicators disclosed in this Statement in order to measure our programme's effectiveness over time. We will also work with our parent company, British Land and our Clients, to improve our initiatives around this topic.

This Statement was approved by the Board on 21 September 2017.



Rob Fisher
Technical and Environmental Director
Broadgate Estates