MODERN SLAVERY ACT STATEMENT

Our business

Socially responsible business should be the intrinsic foundation in which banking operates. Colleagues across the organisation understand the significance of the ethical standards the bank has set and these are at the forefront of how we perform our roles.

We have a proud history as an inclusive employer – our culture encourages a positive and supportive workforce, with robust and effective policies to underpin that culture. Modern businesses face a number of issues and challenges, and one which is of utmost importance is the risk of slavery and human trafficking – an issue that we have stringent controls in place to minimise.

We have a sustainable approach to Corporate Responsibility and we aim to make a positive impact on the lives of our customers, people, communities and the environment we operate in. Our responsibility in delivering this positive impact is not taken lightly and the culture we have created, and work done to date, will continually reflect our dedication to run a business fit for the modern world.

CYBG PLC is an independent banking group. Our business is conducted through our Clydesdale Bank and Yorkshire Bank brands. Within our group is Clydesdale Bank PLC which in turn has a number of subsidiaries. This statement equally applies to Clydesdale Bank PLC, Yorkshire Bank Home Loans Limited and Clydesdale Covered Bonds No 2 LLP. Bank employees are employed by and procurement of services is made mainly via, Clydesdale Bank PLC.

Our policies on slavery and human trafficking

Our aim is to implement and enforce effective systems and controls to minimise the risk of slavery and human trafficking taking place. Our robust policies on Corporate Responsibility can be found accessed here. Our policies and procedures are under continuous review to reflect the changes in the environment in which we operate.

Our people

We are committed to ensuring that we remain compliant with legislation and good employment practices with respect to the engagement and onboarding of employees.

Screening

We employ rigorous approaches to ensure that those engaged to work for us meet the highest standards of fitness and propriety, are fully referenced and have the right to live and work in the United Kingdom (UK). This contributes to the prevention of illegal working
and modern slavery.

Our recruitment policy sets out the standards expected of those being engaged to work for us and we have a third-party provider who undertakes stringent pre-employment screening on our behalf. Those employed directly by us must demonstrate the right to live and work in the UK before undertaking employment. All employment offers are subject to this condition.

We provide recruiting managers with guidance on how to validate documentation provided by candidates evidencing the right to work in the UK. Recruiting managers are required to copy the documents and attest to that they have seen the originals.

In addition to checking that candidates have the right to work in the UK, checks also involve criminal record vetting, credit checks and fraud prevention database searches and checks with the Driving and Vehicle Licensing Agency (DVLA).

In respect of staff not employed by us (for example agency workers), we require that those who have access to our systems, buildings or data undergo vetting to at least the same standard as our own staff, so far as reasonably practicable.

We conduct regular reviews of our contracts with our agency partners and are satisfied that the standards of checks are appropriate.

In respect of companies with whom we have a business to business relationship, our Procurement team where necessary, ensure that obligations are placed on suppliers to appropriately vet their employees and others engaged by them. We have also introduced a Probability Assessment Tool designed to support assessment of the level of checking required. We ensure that third party providers undertake similar checks as a matter of diligence and risk management.

Minimum wage

We undertake regular pay audits to ensure that we always pay at or above the minimum wage and negotiate pay arrangements each year with our recognised Trade Union, Unite. In 2016, we reviewed salaries and increased our minimum salary to the sum promoted by the Living Wage Foundation.

Whistle Blowing

Our Whistle Blowing policy supports colleagues in raising concerns relating to Modern Slavery.

Our suppliers

We rely on the use of suppliers to support the delivery of high quality, effective and efficient services to our customers and the Bank and in doing so we expect all of our suppliers to operate in a responsible, ethical, open and transparent way and in compliance with all applicable laws and regulations. To this end our standard template services contracts now all contain provisions relating to Modern Slavery. Our tender process requires suppliers to confirm that they comply with the Modern Slavery Act within their organisation.

Our Supplier Sustainability Principles require suppliers to comply with all environmental and social laws and regulations and comply with the UN Convention of the Rights of the Child. Our standard form services agreement contains a schedule that contains these principles and a right to audit suppliers to review their compliance and ability to comply with their contractual obligations.

We will publish our Supplier Code of Conduct which sets out the standards, principles and behaviours we expect from our third-party service providers to the bank. Our Supplier Code of Conduct confirms that we have a zero tolerance to Modern Slavery. In addition, it places the expectation that our suppliers protect human rights as described in the United Nations Universal Declaration of Human Rights, treating individuals with dignity and respect.

The majority of our suppliers are headquartered in low risk countries and due diligence is conducted on our direct suppliers and any material sub-contractors to identify any higher risks countries in the end to end supply chain. Our key suppliers are predominantly within the business processing and professional services sectors however we do engage with some suppliers in higher risk sectors such as guarding, corporate clothing, cleaning and
enhanced due diligence is conducted where higher risk characteristics are evident.

We have recently undertaken awareness training with staff who are involved with sourcing activities and those involved in managing our key supplier relationships.

We recently became a member bank of the Financial Services Qualification Scheme and all our key suppliers have been invited to join where they are not already members. Contained within the initial risk assessment that suppliers complete are questions on compliance with the Modern Slavery Act including requesting confirmation from relevant suppliers that they have or intend to publish their own Modern Slavery statement.

Our customers

We have due diligence processes in place to mitigate risks in our relationships with both new and existing customers who open/maintain bank accounts with us. These processes include Anti-Money Laundering Know Your Customer (KYC) checks made both at the point of account opening and periodically throughout the customer relationship.

Further steps

Within the next year, additional compliance training will be developed to enhance knowledge across the Bank of the MSA and associated risks.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group’s slavery and human trafficking statement for the financial year ending 30 September 2017.

Debbie Crosbie
Executive Director

Date: 29/03/2018

Modern Slavery Statement 2017

Useful links

Accessibility
Cookie policy
Modern Slavery Statement
Supplier Code of Conduct
Contact us
Frequently asked questions
Legal and privacy

Our sites
Clydesdale Bank
Yorkshire Bank
Careers

CYBG PLC has offices in

Glasgow: 40 St Vincent Place, Glasgow, G1 2HL

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