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# Modern Slavery in Architectural Practice

## An Executive Summary of Survey and Interviews with RIBA Members

### INDEPENDENT RESEARCH – SUMMARY REPORT

This executive summary reports a selection of key findings as part of an independent academic project conducted at the Royal College of Art (RCA) Department of Architecture. It presents the first step in a broader PhD project that hopes to drive industry change and set the agenda on modern slavery for architects in practice. This project is the first of its kind. It is made possible by the generous support of the London Arts and Humanities Partnership (LAHP) and the Royal Institute of British Architects (RIBA).

Part of the research project titled:

From Compliance to Care; Shaping Modern Slavery Competency in Architectural Professional Practice

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## Research Summary

The project evaluates the fitness for purpose of RIBA's regulation of modern slavery, defines the architect's standard of care in its due diligence and proposes recommendations for an appropriate compliance response.

## Primary Data

**Member Survey:** A summary of the results from over 800 responses to the RIBA Member survey to provide a unique insight through analysis of the data.

**Member Interviews:** A summary of the results from 12 hours of interviews conducted to apply the experience of RIBA Members to identify areas of opportunity for improving standards in architectural practice.

## Conclusions and Recommendations

Based on the evidence, a summary of recommendations made to assist the RIBA in their implementation of the Code and support practitioners in navigating the complex modern slavery lawscape and make ethical decisions in their projects.

## Appendix

**Research Context:** A summary of the conditions that have led to this research project, that provides the language the context to create knowledge and set new standards for architectural practice.

**Methodology:** This section includes a brief overview of the research methods applied in generating the evidence presented in this report.

The RIBA has positioned itself as having the highest professional standards in contemporary architectural practice. It claims, a world-renowned architectural pedigree and is the leading exporter of architecture in Europe <sup>1</sup>. As such, it drives forward with ambitious policy as a key player in global construction and is said to be “a leader in developing and exporting new construction standards” <sup>2</sup>. Acknowledging the urgency of modern slavery in construction project supply chains, the RIBA revised its Code of Professional Conduct (Code) in 2019 to include a specific clause to tackle modern slavery. Framed by recent shifts in the global dynamics and regulation of RIBA Members, (Members) this research attends to the dual pressures of navigating socially responsible practice and internationalising the British architect’s professional standards.

The project focuses on the Code’s impact on the architect in practice as a real-world stimulus for change. By engaging with the RIBA Decade of Action’s “call for change” <sup>3</sup>, the research offers a unique and urgent insight into the socio-institutional codes of international development. It does so by investigating the readiness of Members to comply with their Code by defining the gap between existing and compliant practice. Designed to generate an ethnographic evidence base, it surveyed 826 Members’ opinions, followed by 12 hours of semi-structured interviews. This primary data has been analysed to reveal the prevalence of human rights risks in Members’ project supply chains and measure their standard of skill and care.

The research hopes to assist modern slavery policy implementation and shape future practice by offering practical, quantifiable, and demonstrable strategies. Its findings should provide value to Members and the wider architectural community, not limited to those delivering work in so-called 'high-risk' areas or specifying globally sourced materials. It is especially pertinent to those who might believe that modern slavery is an issue that only exists ‘elsewhere’.

1. RIBA. 2020. '[A Decade of Action RIBA Members and the Sustainable Development Goals](#)'.
2. HM Government. 2018. '[Industrial Strategy; Construction Sector Deal](#)'.
3. RIBA. 2020. '[A Decade of Action RIBA Members and the Sustainable Development Goals](#)'.

## Research Questions

Primary Research Question: How might RIBA Members uphold their Code of Professional Conduct; to 'comply with all applicable legislation concerning Modern Slavery?

Research Sub-Question 1: Is the Code (Components 5.1 and 5.3 of the RIBA Code of Professional Conduct) fit for purpose?

Research Sub-Question 2: How prepared do Members feel to comply with their Code of Professional Conduct?

Research Sub-Question 3: How might Members effectively manage the risk of modern slavery in their project supply chains?

## Summary Conclusions

Based on the evidence summarily presented in this report, the research argues that, despite its intent,

1. The Code is ineffective in tackling modern slavery in Member's project supply chains.
2. The standard of skill and care of the average RIBA Member is insufficient to comply with the requirements of their Code, i.e. to use supply chains which are free from modern slavery.
3. Action is required by the RIBA to develop an appropriate compliance response model to address the policy implementation gap, as per the following recommendations.

## Summary Recommendations

This research advocates a shift institutional practice to drive social change. A shift founded on the provision of quality research to inform ethical decision-making, due diligence record-keeping, enhancing transparency through disclosure and critically, encouraging a practice of care. It is recommended that Members are guided to develop distinct methods appropriate to their projects employing a value-led approach. Best practice should operate above the baseline of legislation to differentiate and characterise the RIBA's unique institution's value(s). The voluntary action of Members should work within and be supported by a rich environment of education and support, under an agreed long-term strategy.

1. Commission a RIBA Modern Slavery Focus Group
2. Develop a Modern Slavery Policy Implementation and Auditing Strategy
3. Provide Modern Slavery Support and Guidance

# Primary Data - Member Survey


## Prevalence


 71% of Members surveyed have identified human rights risks in their projects (SQ.21)


## Preparedness


 60% believe modern slavery is important to their company and the work they do

 47% believe they comply with all applicable legislation concerning Modern Slavery


 38% feel prepared to tackle the eradication of modern slavery in construction supply chains


 59% have received no training in the implementation of modern slavery diligence


 39% are confident in their abilities to ensure modern slavery does not exist in their project supply chains


 24% are happy with the amount of training received in the implementation of modern slavery diligence


## Procedure

 64% are confident that their projects' procedures effectively prevent modern slavery


 49% do not maintain a modern slavery due diligence record for all their projects


 36% have access to a complaint mechanism to report abusive labour practices in their projects


 64% have no company modern slavery policy statement or do not know if one is available


 27% have a good understanding of their company's Modern Slavery policy statement and its requirements


## Policy


 29% of Members are familiar with the provisions of the UK Modern Slavery Act 2015


 17% of Chartered Practices comply with the minimum legal requirements of their Slavery and Human Trafficking Statement under the Modern Slavery Act <sup>1</sup>

 38% believe they are aware of the modern slavery legislation in the countries they practise

 25% of Members are directly subject to non-UK legislation <sup>2</sup>

 99.63% of Members reside in States without criminal law provisions for all practices of human exploitation <sup>3</sup>

 15% of International Members reside in states where Slavery and Slave Trade is not illegal <sup>3</sup>

 20% of International Members reside in states where Forced or Compulsory Labour is not illegal <sup>3</sup>

**417** The domestic jurisdictions of all RIBA Members establish a framework of 417 individual legal codes for modern slavery under the Code's Component 5.1 ('Members shall comply with all applicable legislation concerning Modern Slavery') <sup>3</sup>

- The primary export destinations for British architectural services are regions with the weakest legislative provisions and international obligations in modern slavery <sup>4</sup>

1 Source: Research conducted using the [Modern Slavery Registry](#) website to determine compliance (2020 data)

2 Not including practitioners working internationally, which accounts for 17% of all chartered practice revenue. Source: Research conducted using data published in the [RIBA Membership](#) website to ascertain domestic jurisdiction and the [Antislavery in Domestic Legislation Database](#) to determine domestic legal provisions in preventing modern slavery

3 Source: Research conducted using data published in the [RIBA Membership](#) website to ascertain domestic jurisdiction and the [Antislavery in Domestic Legislation Database](#) to determine domestic legal provisions in preventing modern slavery. Practices include slavery, servitude, practices similar to slavery, forced labour, human trafficking

4 Highest revenue. Source: Research conducted using the [Global Slavery Index](#) to ascertain vulnerability to modern slavery, the RIBA's latest [Business Benchmarking](#) data and the Department of Culture, Media and Sport, [Creative Industries Focus on Exports of Services](#) report to determine export revenue

*“The standard of skill and care of the average Member is insufficient to comply with the modern slavery requirements of their Code of Professional Conduct”*

The research, as outlined below, indicates that in response to Principle 3, item 5.3 of the RIBA Code of Professional Conduct (*Members shall exercise reasonable skill and care to use supply chains which are free from Modern Slavery*), the standard of skill and care of the average Member is insufficient.

The data reveals that over 70% of Members have identified human rights risks in their projects, with Modern Slavery representing over 15% of the risks identified (Survey Question 21). Despite the confidence in the skills of average RIBA Member, this perception is undermined by the standard of skill demonstrated. This is characterised both in the procedures deployed in their projects (Survey Question 3) and their abilities to ensure modern slavery does not exist in their project supply chains (Survey Question 4). Member's skill appears to fall below the standard necessary for compliance, with respondents indicating a lack of preparedness in tackling the eradication of modern slavery in construction supply chains (Survey Question 8). The majority of Members state that they have received no training in implementing modern slavery diligence (Survey Question 6) and are dissatisfied with the amount of training they have received (Survey Question 5).

Member's awareness of legal and regulatory requirements for modern slavery is somewhat contradictory. Despite Member's assertion that they are aware of the modern slavery legislation in the countries in which they practise (Question 13), there is no strong indication of familiarity with the provisions of the UK Modern Slavery Act 2015 (Question 12). This contradiction is further reinforced by the majority of Members stating that their company either has no Modern Slavery policy statement or do not know if one is available (Question 9). Further, responses to assess whether Members have a good understanding of their company's Modern Slavery policy statement and its requirements concerning their projects (Question 10) lacked clear indication. The issue of awareness is highlighted again in Question 7 as respondents state they have not sought to raise awareness of the issues of Modern Slavery in construction.


In practice, due diligence record-keeping is the most effective method of demonstrating the care afforded to comply with relevant legal and regulatory requirements. Therefore, the most critical data in establishing the standard of Member's skill and care in modern slavery is in Question 19 concerning the record of due diligence. The data indicates that Members do not typically maintain a record of modern slavery due diligence for all their projects. In assessing the nature of these procedures in practice, Members indicate that despite their commitment to reporting abusive labour practices to proper and recognised authorities (Survey Question 17), only 35.8% of Members have access to a complaint mechanism (Question 18). Further, of the human rights risks identified in their projects (Question 21), only 16.9% state that these were managed by the risk being reported and formal action being taken (Question 22).

Members generally make a strong statement of care to tackle modern slavery. 60% of respondents assert the importance of modern slavery to their company and their work (Survey Question 2) and claim that they comply with all applicable legislation concerning Modern Slavery (Survey Question 11). Respondents believe that they treat their own supply chains fairly (Question 16) and that they exercise reasonable skill and care to use materials that are free from modern slavery in their projects, including the labour used in their extraction, manufacture and production (Survey Question 14), and ensure that the labour used in their projects is free from modern slavery (Question 15). Despite respondents stating strongly that they would report abusive labour practices to proper and recognised authorities if they became aware of them in connection with their projects (Question 17), such reporting mechanisms are inadequate (Survey Question 18). Finally, a deficit in skills, such as insufficient record-keeping of due diligence conducted in practice (Survey Question 19), renders demonstrating the standard of care, sufficient or otherwise, an especially challenging requirement.

## Primary Data - Member Interview Analysis

Research Question	Response Themes	Response Codes
How prepared do Members feel to comply with their Code of Professional Conduct?	Awareness of the concept of modern slavery in architecture (Theme A)	Concept of modern slavery Limited Exposure Cultural differences Experience of exploitation Globalisation No protection Exploitation in architectural practice
	Actors responsible for protecting the rights of the individual (Theme B)	Contextual Government Individuals Organizations Practices Shared responsibility
	Feeling of responsibility to protect the human rights of all individuals involved in projects (Theme C)	Difficulties Uneasiness Resign from the RIBA Resist Shafted Uncomfortable Under pressure
How might Members manage the risk of modern slavery in their project supply chains effectively?	Opportunities to respond to human rights risks in projects (Theme D)	Abide by international law Client screening Environmental action Ethical codes Fulfilling the needs of society Highlighting the issue of modern slavery Material selection Observation Project Monitoring Specification System selection Understanding how clients operate
	Effective processes to ensure the compliance with all applicable legislation concerning Modern Slavery (Theme E)	Accountability and transparency Audit of supply chain Awareness Compliance with ethical standards Context dependent Certified Products Project management Regulation Responsibility Risk management Schemes Decision making
	Weaknesses in the efficacy of processes (Theme F)	Corruption Lack of transparency Lack of time and resources Political initiative Site inspection Vulnerability Agency Awareness Accreditation
	Ways processes might be improved (Theme G)	Communicating Awareness and education Positive engagement Attention Governance Improve agency Improving processes Increasing transparency Monitoring Sharing responsibility Role of RIBA

# Primary Data - Member Interview Quotes

 **47%** of participants had direct experience of modern slavery, with one participant having been a victim of modern slavery themselves.

*I find it really shocking that everybody knows about [modern slavery], but everybody feels comfortable about it. It's just something that's there, it's happening, and there's nothing we can do about it.*

*It is all very well the RIBA saying, 'You must do this, you must do that.' Well, you must do a lot of things, and we've got to make money and make sure we're sustainable ourselves. I think the bottom line is, make us aware but in proactive, positive way. Help us look at [due diligence of modern slavery] because we're not trained to do this. It's not something that comes naturally to most architects.*

*I think at present, the attention is more on fire safety than it is on ethical issues such as modern slavery.*

*You can't be responsible for every single individual on an entire project from, to quote the phrase, 'extraction to completion'. It is completely impractical.*

*I think setting the bar high is important. But [the RIBA] do need to back it up with a bit more real-life practice behind it.*

*The Modern Slavery Act is 88 pages long, I got to page 4 before I [gave up]. I didn't actually understand it, because I'm not a lawyer. So, it's all very well the Code saying make yourself familiar with this- I'm sorry, but we're busy architects, we do need a little bit more help than that.*

*It's unworkable from an individual member's point of view simply because there's no way to track everything back. To tell someone it is your responsibility to make sure that everyone in that supply chain hasn't been forced to work. Well, you can't do it, because you can't get that information. And frankly, if you didn't get information, it would take you a week for each nut and bolt in the building.*

*It's great to have these principles and policies, and everything going on in the UK, but when you're working in a global economy in other countries across the world, it's very difficult to monitor and manage*

*[We need] some actual concrete examples of what modern slavery means. To me, it's a completely abstract term. What does modern slavery actually mean?*

*[Sustainability schemes] don't get down to the level of what sustainability means in terms of people's welfare and all those things in the UN Charter, various goals in there are often ignored.*

*Make us aware in proactive, positive way. Help us look at this, because we're not trained to do this. If we are given the knowledge, we can actually make it work. Architects are very flexible, they are intelligent and have the imagination to apply things, but I think it's dangerous to put blanket responsibility on somebody when they don't know what their responsibility is.*

*Once you get past a certain layer of traceability, ... to actual construction products, it all begins to get a lot more murky.*

*You got to make it work [for everybody], or if not, tell us how it applies differently to different sectors and different regions. Otherwise, it's probably impossible to manage.*

*For me, [the issue of modern slavery] is equally important as the environmental aspect, because they come around to one and the same in the end.*



# Primary Data - Member Interview Quotes

*When I received the survey, I remember thinking, 'Finally, something is happening. Something must be done about that.' So, I'm really, really glad to participate in this.*

*I think a better understanding of the [types of modern slavery is required] so that you can understand what you're looking for. For people to go, 'Bloody hell, that's a shocker. I didn't realize people were doing that.' It's more about understanding the fact that this stuff goes on, because if it doesn't affect you, then this is kind of not your problem.*

*I would say predominantly site inspections are where [focus] needs to be because anybody can put whatever they want on paper. It's about seeing what's happening on the ground.*

*I have very limited awareness of what [modern slavery] legislation there is. ... [the RIBA should produce a CPD to improve] awareness of what legislation there is from a UK perspective ... and an international perspective. ... then we do the best we can within the context of the region for best practice. Best international practice.*

*It's about making time for it. It's about common sense, and you want to leave a legacy. I don't like seeing people being exploited, it's very sad.*

*All the regulations are there, it's all about teaching practitioners how to implement them. Don't hide and say, 'I don't know'. They should know. All practitioners should be aware.*

*You've got to make people aware. [Ask them], Where is this coming from? Over there. Do you know that this is what happens over there? Like with the timber industry where timber is certified that it comes from a sustainable source. Give the people the information, and it's up to them to make an informed decision."*

*I suppose architecture practices should ask for evidence that all [project stakeholders] have their own measures in place. There should be more in-depth monitoring from the practice itself because as a practice, you want to safeguard yourself.*

*You have to be alive to it all the time. You can't drop the ball. And I think it's probably the same as sustainable certification, it needs to be like that- at every stage.*

*Now we need to consider [modern slavery risks] in the design and construction of a building project as you go through each step. [To consider], 'How can this affect the individual?', or 'are their rights protected?'*

*You can have all of these processes and agreements in place between parties, but it's about monitoring and really checking what is happening rather than just ticking the box, and saying 'OK, I'm done'.*

*Awareness is probably the first thing, I wasn't really aware [of modern slavery in construction] at all.*

*You need to have the culture of knowing that modern slavery is bad, and you need to be alive to it. You need to make reasonable provisions, but you can't be held [responsible]. If you can demonstrate that you've checked all the way through, then that's good enough. Your insurance will just have to cover you if anything comes up.*

*You start off by saying, 'This is best practice. This is the way we're going to do it and we'll give you time to test it.' Then, as it gets used more widely, it becomes the standard practice and everyone applies it, but it doesn't change overnight.*

*Have you thought about it at this stage? Have you thought about it at that stage? You have to be an active participant in checking things.*

## Summary Conclusions

Despite the intent of the revised Code, measuring the implementation and impact of is likely to prove problematic, as securing reliable evidence on modern slavery is inherently challenging. This research reveals the prevalence of this issue, with over 70% of Members identifying human rights risks in their projects, with Modern Slavery representing over 15% of the risks identified. The aim of the project is to both provide information to RIBA Members and the broader architectural community to address the gap between policy and practice. It is hoped this enables the professional to take the next step towards meeting this important and urgent requirement in a complex regulatory environment. The report offers conclusions and possible recommendations of what next steps might be to meet this challenge.

Research shows the value placed on professional standards by RIBA Members, with 96% stating that demonstrating professional competence is important (RIBA 2021). This research finds that 60% believe that modern slavery is important to their company and the work they do (SQ2). However, notwithstanding their best intentions, Members might not be prepared to maintain those standards that they aspire to.. In 2020, data showed that "Knowledge about the UN 2030 Sustainable Development Goals (SDGs) is lacking" (RIBA 2020). The research shines a light on this gap. It finds that in response to Principle 3, Clause 5.3 of the RIBA Code of Professional Conduct on modern slavery, the standard of skill and care of the average Member is insufficient to comply with requirements of their Code. Only 17% of Chartered Practices complying with the minimum legal requirements of their Slavery and Human Trafficking Statement under the Modern Slavery Act.

However, this might not come as a surprise considering the nature of the problem and the policy's aspirations. It is not that the Code's objectives are misplaced, but that Members are not yet ready to meet this requirement. But surely that is their purpose, to strive for the advancement of professional standards? One might also argue that modern slavery is an intractable problem that might never be solved, but that should not diminish the RIBA's goals. Sceptics might claim the Code absolves the RIBA of responsibility from one of the most urgent socio-political questions of globalised architectural practice. Yet at the same time, the Code provides an opportunity for us to hold the RIBA to account. This research supports the RIBA's ambition. It does so by employing a tradition of reflection and self criticism, activities necessary for progress. Its critique deliberately operates with the institutional framework of the RIBA, but from a position of independent academic enquiry. It is hoped that by positioning this research within this framework, one established to support architects working across scale and territory, it might be used to bring us closer to realising the Code's intent.

The research hopes to assist modern slavery policy implementation and shape future practice by offering practical, quantifiable, and demonstrable strategies. Its findings should offer value to both Members and the wider architectural community, not limited to those delivering work in so-called 'high risk' areas or specifying globally sourced materials. It is especially pertinent to those who might believe that modern slavery is an issue that only exists 'elsewhere'.

### 1. Commission a RIBA Modern Slavery Focus Group

Commission an RIBA modern slavery focus group to explore the issue of modern slavery in Member's project supply chains and commit to achieving the highest professional standard in architectural practice. This modern slavery 'way ahead' should include a plan to fulfil agreed statutory and mandatory objectives in response to the recommendations of the RIBA's Decade of Action: RIBA Members and the Sustainable Development Goals. The group might be chaired by the RIBA and comprise of practicing Members, experts in construction, law, supply chains and insurance, policymakers and other stakeholders. Its aim should be to address the policy implementation gap for Principle 3, Clause 5.1 of the RIBA Code of Professional Conduct (*Members shall comply with all applicable legislation concerning Modern Slavery*). The work should include a risk assessment of the issue at the operational level of architectural practice from design to delivery and naturally be conducted in a rigorous and transparent manner.

### 2. Develop a Modern Slavery Policy Implementation and Auditing Strategy

Develop an effective policy implementation and auditing strategy for Principle 3, item 5.1 of the Code to define the framework for the RIBA's regulatory approach. This should be supported by guidance on Member's duties and safeguards to ensure understanding of how to comply with legal and professional obligations in their projects through tangible and verifiable methods. A strategy that encourages voluntary compliance might improve regulatory efficiency by reducing unnecessary enforcement and compliance costs (Scholz 1984) and prepare Members for any statutory requirements in the future. An appropriate compliance response model should be published to ensure consistent and proportionate governance within an environment of implementation support, education, and auditing. It is suggested the RIBA develop a responsive compliance model (Ayres and Braithwaite 1992 after Scholz 1984) based on a compliance continuum to facilitate a response to a spectrum of compliance behaviours.

### 3. Provide Modern Slavery Support and Guidance

#### Policy

1. Assert the equal standing of social responsibility with that of the environment in the definition of 'sustainable development'.
2. Define best practice as a mandatory approach to modern slavery due diligence, such as that defined in the United Nations Guiding Principles for Business and Human Rights (UNGP-BHR)\*
3. Encourage Early Supply Chain Involvement (ESI) and Environmental, Social, and Corporate Governance (ESG) in practice.

#### Awareness

1. Promote a practice of care over regulatory compliance in complex human rights issues.
2. Foreground the issue of modern slavery in construction project supply chains by highlighting the risks globally from material extraction to project completion.
3. Initiate discourse on modern slavery from early education in RIBA validated courses to amplifying the voice of practitioners lived experience of such issues.

#### Knowledge

1. Expand RIBA CPD Core Curriculum on modern slavery through benchmarking across industries and profiling exemplar projects.
2. Provide signposting and expert guidance for successfully navigating practice in high-risk areas of architectural practice.
3. Collaborate with local partners in jurisdictions where RIBA international offices are established to develop local knowledge and resources for non-Eurocentric approaches to law and human rights.

#### Procedure

1. Identify appropriate procedures for achieving regulatory compliance. Example: Due diligence record-keeping and risk management strategies with case studies, such as an audit of the practitioners office (IT (phones, computers, etc), domestic contracts (cleaning, maintenance, taxis, etc), etc).
2. Provide guidance for ensuring adequate legal protection against modern slavery liabilities. Example: A clause compatible with the RIBA Professional Services Contract to define obligations, limitations and indemnity and secure informed consent of such by all parties to the design and construction contract.
3. Provide due diligence sample material for Members. Example: A questionnaire for clients, consultants and suppliers and a modern slavery policy document for Chartered Practice.

\*UNGP-BHR require business enterprises to have 'a human rights due diligence process to identify, prevent, mitigate and account for how they address their impacts on human rights' (United Nations 2011)

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*RIBA Code of Professional Conduct - Principle 3*

*Clause 5.1 Members shall comply with all applicable legislation concerning Modern Slavery.*

*Clause 5.3 Members shall exercise reasonable skill and care to use supply chains which are free from Modern Slavery.*

*Guidance Note 5.3: 'Supply chains' include both materials and people. Members should be aware of the labour used in the extraction, manufacture and production of materials they use or specify, as well as the direct labour involved in their projects.*

## Modern Slavery in Construction Supply Chains

Modern slavery is described as the great human rights issue of our time. It is a wicked problem. Seemingly intractable, it emerges from social complexity at a global scale. The construction industry's incidence of forced labour and exploitation defines it as a "high risk" to modern slavery (CIOB, 2018). The RIBA reflects on the common perception of the problem on construction sites, noting that whilst this is "something that might be found in certain overseas markets, the reality is that it is happening here in the UK, particularly with trafficked labour" (RIBA, 2017). The causes of such practices in the construction industry are generally acknowledged to be the result of the commonplace of global supply chains, bringing a lack of transparency and traceability, with risks increasing when importing materials and labour from overseas (BRE, 2017). This is compounded as a significant proportion of the British architect's global business is with countries known to present a high risk of modern slavery, according to the Global Slavery Index data (Global Slavery Index, 2021).

Due to its very nature, however, reliable figures for the scale of modern slavery in the UK are unavailable. The Building Research Establishment claim that despite reports of potentially thousands of people at risk of modern slavery in the UK, only a fraction are reported and investigated, and even fewer are brought to prosecution. (BRE 2017). However, there has been an increase in public awareness of the exploitation of construction labour due to recent media exposure. Such practices include forced labour, flawed recruitment, late payment of wages, dangerous working and living conditions, and limited access to effective dispute resolution (Wells, 2018). The RIBA acknowledges these issues and highlights "an increasing awareness of modern slavery on construction sites and growing and ever more complex global supply chains" (RIBA 2020). In response, they outline their plan of "more deeply embedding the SDGs within its operations and initiatives" (RIBA 2020).

## The Professional Standards of the RIBA

The RIBA is an institution with more than 44,000 Members, including 8,000 International Members (RIBA, 2018). It encourages individuals to "become leaders within the architectural profession, driving ethics, professionalism and sustainability in an increasingly international context" (RIBA, 2018). To achieve this, the RIBA states three principles as the foundation of professional conduct: "Honesty, integrity and competency, as well as concern for others and for the environment" (RIBA 2005). This commitment is underlined as a signatory to the UN Global Compact and the 17 UN Sustainable Development Goals (SDGs) and adaptation of SDG Goal 11, to make cities inclusive, safe, resilient and sustainable. The RIBA is part of the Global Alliance for Urban Crises, and the Gangmasters and the Labour Abuse Authority's Construction Protocol, a joint agreement to eradicate slavery and labour exploitation in the building industry.

In 2018, the RIBA published the findings of the Ethics and Sustainable Development Commission (ESDC). Endorsed by the RIBA Council, it asserted, "The Institute's unequivocal commitment to placing public interest, social purpose, ethics and sustainable development at the heart of its activities" (RIBA, 2018). In 2021, Ethical Practice was featured in the RIBA's Core Continuing Professional Development (CPD) provision alongside the announcement of a Mandatory Competency in Ethical Practice as part of the Education and Professional Development Framework. These initiatives follow up on the findings of the ESDC and the RIBA's second Ethics and Sustainability Survey, presented in the Decade of Action report in 2021. However, a narrow interpretation of the four pillars of the SDGs is offered, with a focus on environmental responsibility but limited in implementing the RIBA's social objectives. The RIBA acknowledges this gap in its drive to embed the 17 SDGs, characterised as human rights, labour, the environment, anti-bribery and corruption, as "a picture of much achieved, but much more left to do." (RIBA, 2021). Therefore, this work is a response to the RIBA's "call to arms, a call for a step-change in practice...for people, prosperity and planet". (RIBA, 2021).

## From Compliance to Care

The research argues that 'care', an essential quality embedded into the procedures of architectural practice, is being eroded by the architect's diminishing agency and increasing legal and supply chain complexity. It is through the critical lens of care ethics, that prescriptive regulatory requirements are diagrammed to reveal the rights of the individual. The creation of this 'lawscape' makes visible the complexity of a seemingly straightforward obligation for the first time. By spatialising the obscure and entangled regulatory ecosystems that flow across jurisdiction and territory, the research hopes to improve navigation and facilitate the due diligence of this social policy for practitioners.

Against this, surveys and interviews capture qualitative data on the institution's preparedness and define the standard of skill and care of the average RIBA Member. This is used as a basis to evaluate Member's capacity to manage modern slavery risk in their projects effectively. In doing so, the project presents a view on the efficacy of the present governance regime and evidence the Code's fitness for purpose. Further, it indicates whether Members might claim regulatory compliance through their normative practice, or if an alternative approach is required.

## RIBA Member Survey

A survey of the RIBA's Members was conducted in 2021 to measure their standard of skill and care in modern slavery under the Code of Professional Conduct. The survey consisted of 30 questions which used the Likert scale agreement, importance and quality questions to measure attitudes. A total of 1,153 Members responded to the survey, which is representative of 4% of approximately 28,000 current RIBA Chartered Members. Of the 1,153 responses, 327 responses were eliminated due to an incomplete submission. Therefore, a sample of 826 complete and partially complete responses were retained for analysis. The response rate of complete or partially complete survey responses is therefore 71.6%.

## RIBA Member Interviews

Following up with those participants who had provided informed consent during the general member survey, semi-structured interviews were conducted with 16 participants over a period of 12 hours. The data from which was then thematically analyzed following transcription, reading and coding. An analysis of themes was then carried out including quoted responses for each research question respectively, with data visually represented through project and tree maps. Participants experience of practice was broad, with knowledge of the UK, Europe, Asia Pacific, Middle East regions having resided and/or practiced in England, Scotland, Channel Islands, France, Italy, Germany, China, Yemen, Qatar, UAE, Saudi Arabia, Malaysia, Australia, Taiwan, and Japan in addition to their countries of residence at the time of interview.

## Research Ethics

This research was conducted as part of an independent academic project designed and managed under the direction of the RCA PhD Department of Architecture. The RIBA Member Survey was distributed by the researcher and promoted by the RIBA through Member update emails. In order to safeguard the interests of volunteers taking part, the research project obtained ethics approval by the RCA Research Ethics Committee, which was subsequently authorised by the RIBA prior to commencement. Informed consent was provided by all participants and all information has been anonymised and stored securely in line with GDPR protocols. Respondents taking part in the interview were also required to complete a Participant Project Information and Consent Form, which informed them of the scope of the project and their rights. Further details of this strategy are available upon request.