

# **Claret Civil Engineering Ltd**

## **Modern Slavery Policy**

**October 2024**

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## 1. POLICY STATEMENT

Claret Civil Engineering Ltd (Claret CE) recognises that modern slavery and human trafficking is a violation of fundamental human rights and is contrary to the Modern Slavery Act 2015 (the “Act”).

Claret CE takes a zero tolerance approach to non-compliance with the Policy and will not tolerate any slavery or human trafficking in any part of its business or in any part of its supply chain. This Policy applies to all of our supply chain, which must ensure that both its business and that of its supply chain comply with this Policy.

Claret CE will take steps to ensure that modern slavery and human trafficking are not taking place in its own business or within any of its supply chain. This will be achieved by ensuring that:

- Suppliers must comply and act in accordance with this Policy. All Suppliers must have submitted a Pre-qualification document, which also covers the Act.
- All recruitment is carried out in a fair and transparent manner and will comply with relevant legislation and standards.
- The requirements and expectations made of the supply chain in relation to the Act will be clearly communicated and included within contractual terms.
- Suppliers will be expected to comply with the Immigration, Asylum and Nationality Act 2006.
- Claret Civil Engineering will take a partnership approach with regards to working with its suppliers to combat the threat of modern slavery and human trafficking across its sectors and all the industries in which it operates.
- Claret CE will train appropriate staff to understand the risks and issues surrounding modern slavery and human trafficking, how to identify it and appropriate measures to prevent it.

Every Claret CE employee has an individual responsibility to ensure compliance with this Policy, including being alert to the risk of such unlawful practices. Any concerns may be reported to the Management Team.

Claret CE considers a breach of this Policy as a serious offence. Any violation of this Policy or the Act by an employee will result in disciplinary action, up to and including dismissal in appropriate circumstances. In addition, Claret CE will notify the relevant authorities of an individual or a supplier’s contravention of the Act.

This Policy will be reviewed annually to ensure that it reflects current legislation and regulations.



A R GIBBONS  
Managing Director  
7<sup>th</sup> October 2024

## 2. DEFINITIONS

- 2.1. **Modern slavery** - is the term used within the UK and is defined within the Modern Slavery Act 2015. These crimes include holding a person in a position of slavery, servitude forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after.
- 2.2. **Human trafficking** - is modern-day slavery and involves the use of force, fraud, or coercion to obtain some type of labour or commercial sex act. Traffickers use force, fraud, or coercion to lure their victims and force them into labour or commercial sexual exploitation.
- 2.3. **Safeguarding adults** includes: Protecting their rights to live in safety, free from abuse and neglect. People and organisations working together to prevent the risk of abuse or neglect, and to stop them from happening.
- 2.4. **Whistle blowing** - occurs when an individual raises concerns, usually to their employer or a regulator, about a workplace danger or illegality that affects others. The Public Interest Disclosure Act 1998 is the key piece of UK legislation protecting individuals who 'blow the whistle' in the public interest.
- 2.5. **Supply chain** - is the entire process of making and selling commercial goods, including every stage from the supply of materials and the manufacture of the goods through to their distribution and sale.

## 3. SCOPE OF THIS POLICY

- 3.1. This policy sets out the commitments of Claret CE in relation to modern slavery. We recognise that we have a responsibility to take a robust approach to slavery and human trafficking and our organisation is committed to preventing it in our business activities and ensuring that our supply chains are free from, slavery and human trafficking.
- 3.2. We have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all our business dealings and relationships, and to ensuring modern slavery is not taking place anywhere in our own business or our supply chain.
- 3.3. We will raise awareness of modern slavery and our expectations of what should be done to address any issues or suspicions, through this policy and associated training.

## 4. RESPONSIBILITIES

All relevant individuals have a responsibility under this Policy as follows:

### 4.1. Directors shall:

- have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under its remit comply with it.
- Have a responsibility for ensuring the approval of the annual Modern Slavery statement.

### 4.2. Line Managers/Supervisors shall:

- have personal responsibility for ensuring this policy is communicated, understood, and applied in their business area
- ensure any relevant training is delivered to all employees within their area of responsibility as required by Claret CE.
- support anyone who raises genuine concerns in good faith under this policy, even if they turn out to have been mistaken.

- treat concerns raised by employees seriously, investigating and escalating as appropriate and taking any required action without undue delay.

### 4.3. Claret CE employees shall:

- familiarise themselves with this policy and act in accordance with our commitments at all times
- undertake any training that is required of them by the Claret CE.
- escalate any concerns or issues they may perceive to be in breach of this policy to line management or HR swiftly and in confidence; if it doesn't feel right, tell someone.
- co-operate with managers in eliminating any risk of modern slavery and human trafficking within our own activities and supply chain.

### 4.4. Contractors /sub contractors shall

- familiarise themselves with this policy and act in accordance with Claret CE commitments at all times when on our sites.

## 5. MODERN SLAVERY DEFINED

5.1. Modern slavery is an umbrella term that covers the offences of human trafficking and slavery, servitude and forced or compulsory labour, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. It is a highly complex and hidden crime that is a violation of fundamental human rights. There are a number of crimes that are covered under the definition of modern slavery; these are:

- Bonded labour – individuals who are forced into debt by paying to get a job or mandatory equipment or have their passports taken to restrict their movements.
- Forced labour – individuals who are forced to work long hours for little or no pay in poor conditions, under verbal or physical threats to themselves or their families.
- Trafficking – individuals or groups moved from one area to another for forced or bonded practices.
- Criminal exploitation – where a victim is exploited to commit a crime, for example, pickpocketing, shoplifting, drug trafficking, and cannabis cultivation.
- Sexual exploitation – including sexual abuse, forced prostitution, and abuse of children for the production of images or videos.
- Domestic servitude – where an individual is forced to work in private households with restricted freedom and work long hours for little or no pay.
- Less commonly identified crimes include organ removal, forced marriage, and illegal adoption.

## 6. SPOTTING THE SIGNS OF SLAVERY

6.1. Claret CE employees may come into contact with a victim of modern slavery without even realising. Signs that someone might be a victim of modern slavery include:

- Showing signs of injury, abuse and malnourishment.
- They look unkempt, are often in the same clothing and have poor hygiene.
- Appearing to be under the control and influence of others.
- Living in cramped, dirty, overcrowded accommodation.

- They have no access or control of their passport or identity documents.
- Appearing scared, avoiding eye contact, and being untrusting.
- They may allow others to speak for them when addressed directly, rather than speak for themselves.
- They're collected very early and/or returned late at night on a regular basis.
- May have inappropriate clothing for the work they are performing, and/or a lack of safety equipment.
- May be isolated from the local community and their family.
- They travel only with other workers.

(Information taken from <https://crimestoppers-uk.org/keeping-safe/community-family/modern-slavery>)

## 7. HOW TO REPORT MODERN SLAVERY CONCERNS

7.1. Anyone who suspect incidents or signs of modern slavery should:

- Inform their line manager or supervisor
- If there are concerns of immediate danger, contact the police by dialling 999.
- If colleagues hold information that could lead to the identification, discovery and recovery of victims in the UK, they should contact the Modern Slavery Helpline 0800 0121 700.
- If you have come into contact with someone who you suspect may be a victim of modern slavery and in need of help, you can also phone the Salvation Army, free 24/7 confidential referral helpline: 0800 808 3733
- Alternatively, calls can be made anonymously to Crimestoppers on 0800 555 111.
- For more information, [www.unseenuk.org](http://www.unseenuk.org), <https://crimestoppers-uk.org/keeping-safe/community-family/modern-slavery>

## 8. RECRUITMENT

8.1. Claret CE understands we have a responsibility to prevent illegal working. We do this by conducting simple right to work checks before someone is employed, to make sure the individual is not disqualified from carrying out the work in question by reason of their immigration status.

- For British or Irish citizen, 2 forms of Identification will be checked, these can be:
  - Passport
  - Birth Certificate
  - Driving Licence
  - adoption certificate
  - a certificate of registration or naturalisation as a British citizen
- If they are not a British or Irish citizen, the following will be checked:
  - a share code (<https://www.gov.uk/prove-right-to-work/get-a-share-code-online>)
  - Relevant immigration documents
- Asylum seekers
  - Employer Checking Service (<https://www.gov.uk/employee-immigration-employment-status>)

8.2. Only original documents will be accepted by Claret CE to confirm identity, photocopies or photographic proof is not permitted.

8.3. If the applicant is not a British or Irish citizen, we will also need to check that:

- the dates for the applicant's right to work in the UK have not expired
- the applicant has permission to do the type of work we are offering (including any limit on the number of hours they can work)

- for international students we will need to see evidence of their study and vacation times
- 8.4. Claret CE may request references of a prospective employee in confidence, from a third party, providing a factual check on a candidate's employment history, experience and/or an assessment of the candidate's suitability for the post in question.

## 9. SUPPLY CHAIN TRANSPARENCY

- 9.1. Claret CE are committed to transparency in our supply chain and will work to identify and assess potential risks of modern slavery and human trafficking within our supply chain.
- 9.2. Claret CE will engage with suppliers and partners to promote ethical business practices and ensure compliance with relevant laws and regulations.
- 9.3. Claret CE will conduct due diligence assessments of our suppliers and business partners to evaluate their commitment to preventing modern slavery and human trafficking.
- 9.4. Claret CE will assess the risk of modern slavery and human trafficking in our supply chain and take appropriate measures to mitigate these risks.

To mitigate risk within our supply chains, we have implemented and communicated the following systems and controls:

- Identify and assess potential risk areas in our UK supply chains by conducting risk analysis
- Mitigate the risk of modern slavery in our supply chains by being open with suppliers on how we work together
- Ask third party providers for a copy of their Modern Slavery policy or statement. Where this is not available, we will ask third party providers to read and comply with the Claret CE Modern Slavery policy. This is carried out at the initial contact stage of all new suppliers.

## 10. MONITORING AND REVIEW

- 10.1. This policy will be reviewed regularly to ensure our statements of commitment are appropriate and in line with current legislation. We will also review all other policies that may be of relevance to, or in connection with, this policy to ensure our commitments are sustained.

## 11. POLICY BREACHES

- 11.1. Claret CE aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.
- 11.2. Claret CE are committed to ensuring no one suffers any detrimental treatment, as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the HR Manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our grievance procedure.
- 11.3. Any employee who knowingly breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. Claret CE may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy. Breach of this policy may lead to prosecution under the Modern Slavery Act 2015.

**12.RELATED DOCUMENTS**

- Modern Slavery Act 2015
- Whistleblowing policy
- Code of conduct Policy
- Sustainable Materials Policy
- Disciplinary and Grievance Policy
- Equality and Diversity Policy

**13.DOCUMENT CONTROL**

REVISION AND AMENDMENT REGISTER				
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07/10/24		Full document review	2.0	Lesley Skingle