

RM45. Modern Slavery and Human Trafficking Policy

Policy Statement

Ensigna Construction is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking. Under the Act, modern slavery is a criminal offence. Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking, 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.

Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion. As an equal opportunities employer, we are committed to creating and maintaining a non-discriminatory, safe and respectful working environment for our staff. We also want all our people to feel confident they can expose wrongdoing without any risk to themselves.

We do not enter into business with any organisation which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

Our Policy is designed with the aim of identifying and preventing opportunities for modern slavery to occur within our business or supply chain.

In addition to directly employing a number of staff, Ensigna Construction maintains relationships with many different organisations in our wider supply chain and with specialist sub-contractors (companies and individuals). We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own businesses or those of our approved suppliers.

Ensigna Construction respects fundamental human rights and is committed to the principles set out in the United Nations Universal Declaration of Human Rights. We support and respect the protection of human rights within our sphere of influence; in particular the effective elimination of compulsory labour and child labour.

Our zero tolerance attitude to modern slavery and human trafficking underpins all our business and interpersonal relationships. We expect the same attitude from all who work for us, with us and on our behalf, across our supply chain partners.

Scope of this Policy

This Policy applies to all recruiting and purchasing managers and staff of Ensigna Construction.

We also require any supply chain partners and sub-contractors working on our behalf to demonstrate that they operate complementary policies and procedures with regards to modern slavery and human trafficking.

Implementation

Senior staff will receive training in the application of this policy to ensure that they are aware of its contents and provisions.

All staff will be made aware of the Policy as part of their induction training and whenever the Policy is updated.

Managers at all levels are responsible for ensuring those reporting to them:

- understand and comply with this policy
- are given adequate and regular training on it and the issue of modern slavery.

Our Policy details will be provided to all potential supply chain partners and sub-contractors as appropriate.

Definitions

The Modern Slavery Act 2015 was published in March 2015 in response to growing concerns about the treatment of individuals and groups of people whose human rights are being abused through trafficking, enforced labour and servitude.

The term 'Modern Slavery' captures a range of types of exploitation, many of which occur together. These include but are not limited to:

- Sexual exploitation
- Domestic servitude
- Forced labour
- Criminal exploitation
- Other forms of exploitation include organ removal, forced begging, forced benefit fraud, forced marriage and illegal adoption.

Our processes and standards to help prevent modern slavery and human trafficking

Ensigna Construction has in place a number of procedures which contribute to the elimination of modern slavery and human trafficking:

Recruitment and remuneration

We operate robust recruitment processes which are compliant with UK legislation, including pre-employment and reference checks and seeking Disclosure and Barring Service (DBS) checks as appropriate. This includes full or part time employees and contractors/ consultants.

We are also a London Living Wage employer.

For our supply chain we are signed up to the Government's Prompt Payment Code.

Supplier and sub-contractor screening procedures

Our supply chain selection procedures assess whether an organisation satisfies minimum levels of economic and financial standing and technical and professional capability. The supplier and subcontractor standard selection questionnaire includes questions on safeguarding and Modern Slavery.

Reporting concerns and Whistleblowing Procedure

Employees are encouraged to raise any concerns about suspected modern slavery associated with the company or our suppliers. They can do this by reporting their concerns to their site manager, contracts manager, our office manager or director, or through our Whistleblowing Procedure. This enables staff to report confidentially any concerns they may have, including those relating to the abuse of people's human rights. The procedure is designed to make it easy for staff to make disclosures without fear of retaliation or any type of detrimental treatment.

Training and Awareness

We recognise that people who have been abused and trafficked may not feel able to disclose their situation and we understand the importance of raising awareness of signs of modern slavery across all areas of service delivery. This may be included in Toolbox Talks and reviews with our supply chain members.

Review

This Policy and Procedure will be reviewed at least annually by the Ensigna management team and in the light of any change to employment legislation.

Steve Wells

Director

Ensigna Construction Ltd