

Anti-Slavery and Human Trafficking Policy

Introduction

Illingworth & Gregory Ltd is a construction business which operates within the United Kingdom and primarily across the Yorkshire region. The Company values human rights and is committed to ensuring that all business is conducted according to ethical, professional and legal standards in a fair, honest and transparent manner.

The Modern Slavery Act 2015 is an Act of Parliament of the United Kingdom.

Modern slavery is a crime and a violation of fundamental human rights it takes various forms, such as;

- slavery, servitude (coercing someone to provide services) and forced and compulsory labour;
- human trafficking (arranging or facilitating the travel or movement of a victim with a view to them being exploited);
- committing any offence with the intention to commit human trafficking;
- aiding, abetting, counselling or procuring any of the above offences,

all of which have in common the deprivation of a persons liberty by another in order to exploit them for personal or commercial gain. Illingworth & Gregory Ltd has a commitment to conduct its business and all its relationships based on integrity.

Policy

This policy applies to all persons working for the Company or on behalf in any capacity, including employees at all levels, directors, agency workers, seconded workers, volunteers, agents, contractors, external consultants, third party representatives and suppliers.

'zero tolerance approach to slavery and human trafficking'

Illingworth & Gregory Ltd has a zero tolerance approach to modern slavery and human trafficking within its business and within its supply chain and is committed to acting ethically and with integrity and transparency in all of its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking is not taking place anywhere within either its own business or in any of its supply chains, consistent with its obligations under the Modern Slavery Act 2015.

The Company accepts that it has a responsibility through practical and reasonable due diligence processes to ensure that workers are not being exploited, that they are safe and that relevant employment, health and safety and human rights laws and standards are being adhered to.

The Board of Directors have overall responsibility for ensuring that this policy complies with the Company's legal and ethical obligations. To enable monitoring its use and effectiveness and auditing internal control systems and policies and procedures to ensure they are effective in preventing or remediating the risk of modern slavery, the Company has put the following in place;

- A policy which articulates the Company's commitment to prevent violations of the Modern Slavery Act 2015 within its operations and supply chain, being this Policy;
- Communication of this Policy and all relevant elements of the programme to all the employees throughout the Company and to our business partners and supply chain;
- The assessment of modern slavery and human trafficking risks within the company and its supply chain and the development of effective, efficient and transparent controls to reduce exposure to those risks;
- The adoption of anti-slavery wording in contracts;
- The adoption of appropriate due diligence on business partners, agents, contractors, consultants, sub-contractors and suppliers coupled with a requirement that they implement procedures which incorporate the principles of the Modern Slavery Act 2015; and
- Training of all relevant individuals throughout the Company so that compliance with its policies and procedures is the duty of all relevant employees at all levels and so that individuals can recognise slavery practices and take steps to avoid the same.

Compliance

The prevention, detection and reporting of modern slavery in any part of the Company's business and supply chains, whether in the UK or abroad, is the responsibility of all those working for or under its control. Those working on the Company's behalf are required to avoid any activity that might lead to, or suggest, a breach with this Policy.

If you believe or suspect a breach of or conflict with this policy has occurred or may occur, you must notify a Company Director as soon as possible. Staff are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the Company's business or supply chains at the earliest possible stage.

Internal reporting is critical to the Company's success and it is both expected and valued. Staff are required to be proactive and promptly report any suspected violations of the Policy or any illegal or unethical behaviour that you become aware of. Complaints will be kept confidential and will be dealt with appropriately.

If you are unsure about whether a particular act, the treatment of workers or their working conditions within any of the Company's supply chains constitutes any of the various forms of modern slavery, it should be raised with a Company Director.

The Company 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. The Company is committed to ensuring no one suffers any detrimental treatment or victimisation as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains.

Training and communication

Regular training on this policy, and on the risk that the business faces from modern slavery in its supply chains, will be provided to staff as necessary, so that they know how to identify exploitation and modern slavery and how to report suspected cases.

The Company's zero tolerance approach to modern slavery must be communicated to all suppliers, contractors and other business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Breach of the policy

Any employee who breaches this policy by engaging in or conspires to engage in any modern slavery conduct or human trafficking will face disciplinary action. This could, in the most severe circumstances include immediate dismissal for misconduct or gross misconduct and if warranted legal proceedings may be brought against you.

The Company may terminate its commercial relationship with suppliers, contractors and other business partners if they breach this policy and/or are found to have been involved in modern slavery or human trafficking.

This Policy was approved on 08 October 2018:

Name: Jeremy Illingworth

Position: Managing Director

Signature: 

Date: 08.10.18