

# HS93 Modern Slavery Statement

## Introduction

This statement sets out Speller Metcalfe's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

We understand that modern slavery does exist within the UK and subsequently recognise that we have a responsibility to take a robust approach to slavery and human trafficking. Our organisation is absolutely committed to ensuring that there is no modern slavery or human trafficking in our corporate activities, our supply chain, or any other part of our business. This statement covers the activities of Speller Metcalfe (SML) and is appropriate to the nature and scope of our business operations. Our business is headquartered in Malvern, Worcestershire, with a regional office in Wolverhampton. We undertake construction activity solely in the United Kingdom using regional and national supply chains. It outlines how we protect against modern slavery in our supply chains, meeting the requirements of the Modern Slavery Act 2015.

Although the construction industry as a whole has been shown to be at increased risk of human trafficking owing to the widespread use of agency workers and reliance on migrant labour, we believe there are a number of factors which reduce the risk of slavery within our organisations and our supply chains, including:

- The requirement for all staff working on SML sites to hold a valid CSCS card (validated trade qualification)
- A good level of oversight from directly-employed SML staff across all sites and operations, increasing control and allowing for visibility of our own work and staff and reducing risk of slavery or human trafficking going undetected;
- Work is not seasonal and does not rely upon on unskilled labour;
- We operate solely in the United Kingdom.

## Our policies in relation to Modern Slavery & Human Trafficking

It is the policy of Speller Metcalfe to:

- Ensure a high level of understanding of the risk of modern slavery and human trafficking in our supply chains and our business;
- Pay all staff at least the living wage and ensure that all staff have a written contract of employment;
- Ensure all staff are given access to the Speller Metcalfe employee handbook and understand their statutory rights, including in relation to any benefits they may be entitled to, including holiday pay and sick pay;
- Operate robust employment and recruitment practices, including ensuring all right to work and eligibility checks are undertaken to safeguard against human trafficking/individuals being forced into work against their will;
- Ensure that all employees are aware of their own responsibilities in relation to modern slavery and human trafficking;
- Ensure compliance with our modern slavery policy and all other policies and processes through regular review, site visits and internal and external compliance audits.

We also operate the following policies that further support our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

- Whistleblowing policy - We encourage all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns are encouraged to contact their line manager or the Whistleblowing Officer (HR Department) with any concerns.
- Foreign Worker Policy - This policy outlines our processes and requirements to ensure adequate provisions for non-

- English speaking personnel to work safely on our sites.
- Materials Sourcing Policy - We are committed to ensuring that materials are sourced in a sustainable manner from reputable, approved suppliers.
- Employee code of conduct - Our Employee Handbook makes clear to employees the actions and behaviour expected of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- Procurement code of conduct - We are committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We work with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of our supplier code of conduct will lead to the termination of the business relationship.
- Recruitment/Agency workers policy - We use only specified, reputable employment agencies to source labour and always verify the practices of any new agency Speller Metcalfe uses before accepting workers from that agency.

## Due diligence

We undertake due diligence when considering taking on new suppliers and regularly review existing suppliers. This includes:

- Communicating with all of our supply chain members on their requirements under the Modern Slavery Act;
- Requiring all members of our supply chain to provide a declaration to abide by both the Speller Metcalfe Modern Slavery Statement and to confirm compliance with the Modern Slavery Act;
- All new/prospective supply chain members to provide evidence of their own modern slavery policies/statement in order for us to best evaluate the modern slavery and human trafficking risks of any new supplier;
- Participating in collaborative initiatives focused on slavery and human trafficking in particular, including signing up to the Gangmasters & Labour Abuse Authority's Construction Protocol and supporting campaigns by other organisations such as the Considerate Constructor's Scheme.

## Training & KPIs

We require relevant staff within our organisation to complete training on modern slavery and human trafficking. Our modern slavery training covers:

- How purchasing practices influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or the provision of products by an unrealistic deadline;
- How to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- How to identify the signs of slavery and human trafficking;
- What initial steps should be taken if slavery or human trafficking is suspected;
- How to escalate potential slavery or human trafficking issues to the relevant parties within our organisation;
- What external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority;
- What messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- What steps our organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from our supply chains.

## Modern Slavery 'Toolbox Talks' and e-learning modules.

In 2022 we will complete a full training needs assessment to determine where we can provide further support to our people, our customers and our supply chain

We will monitor KPIs relating to this training to ensure our continual improvement and high standards. We are committed to developing and implementing a more comprehensive set of KPIs in relation to the information provided by our supply chain during the onboarding process, including an audit of % of suppliers providing Modern Slavery Statements/policies.

Raising awareness and supporting the Gangmaster's and Labour Abuse Authority's Construction Protocol  
In addition to this formal training, we are also committed to raising awareness of modern slavery issues across our organisation and throughout our supply chain by putting up posters across our sites and offices and circulating emails to

staff.

We use posters and other collateral provided as part of the Construction Protocol agreement and other resources provided through the Considerate Constructor's Scheme which explain:

- The basic principles of the Modern Slavery Act 2015;
- How employers can identify and prevent slavery and human trafficking;
- What employees can do to flag up potential slavery or human trafficking issues to the relevant parties within our organisation;
- What external help is available, for example through the Modern Slavery Helpline.

This policy is required annually by the board of Directors who take responsibility for implementing this policy statement to ensure that our organisation and supply chains are free of slavery and human trafficking.

## Policy Control

This policy does not confer any contractual entitlement; Speller Metcalfe may at any time at our discretion make changes to the policy or remove it altogether. Any abuse of the above policy may lead to disciplinary action (which may include dismissal).



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**Last Reviewed Date:**  
31st March 2024

**Next Review Date:**  
31st March 2025