

working together

Experts IN support services for infrastructure markets



Modern Slavery & Human Trafficking Statement



Written By: Fiona Burke Head of Human Resources	Signed: 	Date: 26/10/2016
Verified By: Sean McGinley Director	Signed: 	Date: 26/10/2016
Document Reference: MS&HTS		Issue: 01

This procedure is the sole property of McGinley Support Services. None of its contents may be divulged to any other company or organisation without the prior consent of the Managing Director.

If you are reading a paper based copy of this document, it has an 'uncontrolled' status.

Introduction

This statement sets out McGinley'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. This statement relates to actions and activities during the financial year 1 January 2016 to 31 December 2016.

As part of the Infrastructure industry, the company recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The company is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

This statement covers the activities of McGinley. The company is one of the UK's largest specialist recruitment agencies providing the Infrastructure sector of the construction industry with permanent, contract and temporary staff at all levels. Consulting and recruiting for nearly four decades, we now help customers in Airports, Energy, Metro, Ports, Rail, Roads, Telecoms, Waste and Water, and can supply staff, labour and support services to civil engineering contractors, subcontractors, utilities, infrastructure owners and operators nationally.

In our work as a construction recruitment agency we support both those looking to recruit staff and those looking for construction jobs. We ensure that the staff we provide have the necessary skills and safety knowledge to do the job to an excellent standard in the markets we specialise in, and as well as following UK industry standards, we comply with the law as a minimum.

The company has an annual turnover in excess of £64m.

McGinley is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Ethical Trading Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

The Supply chain is categorised according to an internal risks profile - these are:

Category	Description
Low risk	Typically High Street goods protected by the Consumer Goods Act.
High risk	This could be any sub/contract supplier with assigned environmental, health and safety responsibilities, for example <i>contracted lift</i> or other <i>waste management</i> duties.
High risk (Safety critical)	These suppliers will be audited where identified. If they are regulated via an "industry approved" system, then an audit will normally be required if a complaint or other issues were identified.

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors comply with our values.

Responsibility

Responsibility for the company's anti-slavery initiatives is as follows:

- **Policies:** The Business Support Director is responsible for putting in place and reviewing policies and the process by which they were developed.
- **Risk assessments:** The Approved Suppliers list is reviewed to ensure the information is current. The regular Suppliers are checked and are scheduled on the Management Review meetings to ensure continued compliance with required standards. Where possible we build long standing relationships with suppliers and make clear our expectations of business behaviour;
- **Investigations/due diligence:** The Head of Safety and the Head of Human Resources are responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking.
- **Training:** To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff. All Directors have been briefed on the subject.

Relevant policies

The company operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy:** The Company encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The company's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can use our confidential helpline.

- **The Code of Ethics/ Ethical Trading Policy:** The Company's code of ethics makes clear to employees the actions and behaviour expected of them when representing the company. The company strives to maintain the highest standards of employee conduct and ethical behaviour when operating and managing its supply chain.
- **Sustainable Procurement Policy:** The Company is 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. The company works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the company's supplier code of conduct will lead to the termination of the business relationship. [Describe the process and steps taken to implement the code of conduct in relation to slavery and human trafficking, including examples (not necessarily named) where action has been taken to address specific slavery and human trafficking risks.]
- **Recruitment policy:** The Company uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

Due diligence

The company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The company's due diligence and reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking
- evaluating the modern slavery and human trafficking risks of each new supplier
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping
- conducting supplier audits or assessments through the company's buyer/auditor], which have a greater degree of focus on slavery and human trafficking where general risks are identified
- creating an annual risk profile for each supplier
- taking steps to improve substandard suppliers' practices
- participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our Ethical Trading Policy, including the termination of the business relationship

Performance indicators

The company has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the company is:

- requiring all staff to have completed training on modern slavery by December 2016
- developing a system for supply chain verification in place since January 2016 whereby the company evaluates potential suppliers before they enter the supply chain
- reviewing its existing supply chains completed annually whereby the company evaluates all existing suppliers

Training

The company requires all staff within the company to complete training on modern slavery.

The company's modern slavery training covers:

- our business's purchasing practices, which 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 wages below a country's national minimum wage, 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 the company
- what external help is available, for example through the Modern Slavery Helpline, and "Stronger together" initiative
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies
- what steps the company should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the company's supply chains

Awareness-raising programme

As well as training staff, the company has raised awareness of modern slavery issues by circulating a series of emails to staff.

McGinley Support Services (Infrastructure) Ltd
Modern Slavery and Human Trafficking Statement
Issue 01
Review Date: 26/10/2017

The emails explain to staff:

- 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 the company
- what external help is available, for example through the Modern Slavery Helpline

Board approval

This statement has been approved by the company's Board of Directors, who will review and update it annually.