



Modern Slavery Policy

Policy statement

The purpose of this policy is to have a zero-tolerance approach to modern slavery which is a crime and violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and 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. Clerks of Works Inspector Services Ltd opposes all forms of modern slavery.

Our Commitment

Clerks of Works Inspector Services Ltd is 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 business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels and directors.

Objectives

- To ensure there are no violations of fundamental human rights to any person or persons we as a business have dealings and relationships with.
- Create an environment in which individual differences and the contributions of all our employees are recognised and valued.
- Create a working environment that promotes dignity and respect for all. No form of slavery, servitude, forced and compulsory labour or human trafficking will be tolerated.
- Act ethically and with integrity in the workplace.
- To treat breaches of the modern slavery policy seriously and to take disciplinary action when required.
- Provide information and training to all employees, so that they are fully aware of the issues relating to Modern Slavery and their responsibilities relating to it.
- To ensure the policy is fully supported by the directors.
- Monitor and review the policy annually



Responsibilities of Management

- Directors will be responsible for the success and implementation of this policy and will define the company's approach to The Modern Slavery Act 2015
- The directors will be responsible for communicating this policy to all employees, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter and measuring, monitoring and evaluating the success of our approach.
- Everyone carries a personal responsibility for their own behaviour and for ensuring that their conduct is in accordance with objectives set out in this policy. To act as role models, pro-actively addressing instance of slavery, servitude, forced and compulsory labour, or human trafficking
- Report any instance of slavery, servitude, forced and compulsory labour or human trafficking which they witness or which comes to their attention
- Ensure that grievances, concerning intimidation, bullying, discrimination, harassment, slavery, servitude, forced and compulsory labour or human trafficking are dealt with properly, fairly and as quickly as possible
- Protect Whistleblowers
- We aim 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. We 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 Directors immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.
- We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy

Responsibilities of Staff

- Comply with the policy
- Everyone carries a personal responsibility for their own behaviour and for ensuring that their conduct is in accordance with objectives set out in this policy. To act as role models, pro-actively addressing instance of slavery, servitude, forced and compulsory labour, or human trafficking
- Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.



- Report any instance of slavery, servitude, forced and compulsory labour or human trafficking which they witness or which comes to their attention in accordance with our 'Whistleblowing' Policy

Review and Monitoring

Overall responsibility for the operation of this policy lies with the Directors and will be monitored on an annual basis

Signed *Mark Irwin*

**Director
Clerks of Works Inspector Services Ltd**

Date March 2017