



Modern Slavery And Human Trafficking Statement

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MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Document ID	Effective Date	Prepared By	Approved By	Next Review Date
CCSW-HR-PR-12 (V3)	July 2022	Annie Hill (MD)	Ian Webb	November 2023

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STATEMENT

1. INTRODUCTION

Connor Construction (South West) Ltd (“we” “the Company”) is making a voluntary modern slavery and human trafficking statement relating to section 54 of the Modern Slavery Act 2015.

This statement applies to all persons working for us or on our behalf in any capacity, including employees (and prospective employees) at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors and suppliers.

2. COMMITMENT

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. The Company has a zero-tolerance approach to any form of modern slavery, corruption and bribery and this policy is endorsed by our Board of Directors. The Company oppose slavery and human trafficking in all its forms and makes this statement to set out the steps that it has taken to ensure that there is no slavery or human trafficking in the business or in it’s supply chains.

We fully support the government’s objectives to eradicate modern slavery and human trafficking. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

3. ABOUT US

We are a small family owned business in the construction sector. Our annual turnover is under £36 million. Although we are not required to make a modern slavery statement under section 54 of the Modern Slavery Act.2015, we are making this voluntary statement to show our commitment to ethical trading principles and to set out the steps we are taking to tackle modern slavery and human trafficking in our business and in our supply chains.

Our supply chains are mainly made up of the following:

- CMT (PPE and site tools)
- Colas (bitumen emulsion supplies), Aggregate Industries, Wainwrights Hansons, Tarmac (supply of stone), Jewsons (building materials),
- Ikon (mastic asphalt)
- Aqua Cleaning

4. OUR POLICIES

We operate a number of internal policies that reflect 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. These include:

1.	Anti-slavery policy	This policy sets out the organisation’s stance on modern slavery and explains how employees can identify any instances of this and where they can seek help.
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2.	Recruitment policy	We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will. During the recruitment process, our organisation identifies any foreign workers and their nationalities. All recruitment is processed in line with the Immigration, asylum and nationalities Act 2006. All documents used to verify an employee's right to work are retained for at least 2 years after the individual has left our company.
3.	Whistleblowing policy	We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
4.	Code of business conduct	This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

5. SUPPLY-CHAIN DUE DILIGENCE AND RISK ASSESSMENT

The Company operates a supplier policy and maintains a preferred supplier list. To help and monitor the risk of slavery and human trafficking in our supply chain, we conduct due diligence on all suppliers before allowing them to become a preferred supplier. Our contractors and suppliers are all UK based.

As part of our contract with suppliers, we require that they confirm to us that they:

- Have taken steps to eradicate modern slavery within their business.
- Hold their own suppliers to account over modern slavery.
- Pay their employees at least the national minimum wage / national living wage.

We may terminate the contract at any time should any instances of modern slavery be proven.

6. EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We use the following key performance indicators (KPIs) to measure how effective we have been at ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains:

- The percentage of suppliers and sub-contractors vetted for ethical labour practices.
- The number of reported breaches in the past year.
- Percentage of staff receiving training on identifying and addressing the risk of slavery and human trafficking in our business and supply chains.

7. 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 our staff.

8. SLAVERY AND HUMAN TRAFFICKING

We have considered the risk of The Company being exposed to slavery and human trafficking, taking into account:



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- The highly skilled nature of roles and activities undertaken within The Company and the competencies required to perform them.
- The application of our policies, including whistleblowing and anti-bribery & corruption; and
- That our supply chain operations are substantially based in the UK.

As a result of the factors above and, as noted elsewhere in this statement, we deem the risk of slavery or human trafficking occurring within our business to be relatively limited. The Company shall take responsibility for this statement which will be reviewed and updated as appropriate but no longer than annually.

This voluntary slavery and human trafficking statement is made in connection with s54(1) of the Modern Slavery Act 2015, for the financial year ending 6th April 2023.

9. REVIEW OF STATEMENT

This policy has been reviewed and signed by CEO, Ian Webb:

29/11/2022

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Ian Webb
CEO

Signed by: Ian Webb



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REVISION HISTORY

Revision Number	Description Of Revision	Revised By	Revision Date
1	Implementation of HR Statement.	Annie Hill (MD)	July 2021
2	Second point taken from clause 6.	Genevieve Thorogood	August 2022
3	Document re-formatted and ID updated from CCSW-MSHTS by QM. Statement reviewed by Lucy Cotterell.	Lucy Cotterell (MD)	November 2022