

Modern Slavery Policy

SPPS16



The signatures below certify that this Manual has been reviewed and accepted and demonstrates that the signatories are aware of all the requirements contained herein and are committed to ensuring their provision.

COMPANY PROPRIETARY INFORMATION

This document is an uncontrolled copy of a controlled document held by the Business Management System. Prior to use, ensure this document is the most recent revision by checking the Master Document List. To request changes, submit a Document Change Request to the Rail and Fleet Compliance Co-ordinator

	Signature	Position	Date
Prepared By	A.Stander	Director	29/09/22
Reviewed By	D Male	HSQE	29/09/22
Approved By	G.Vickers	Managing Director	29/09/22

Uncontrolled copy if not retained in designated folder on server

Amendment Record

This Manual is reviewed annually to ensure relevance to the systems and process that it defines.

A record of contextual additions or omissions is given below.

	Guide Page (Numbers)	Context	Initial
01/09/16		New	DM
17/08/17		Minor re-wording of Policy based on lessons learnt. Separated out Annual Compliance Statement.	DM
16/10/18		Annual review only	DM
08/10/19		Annual review only	DM
05/10/20		Periodic Review, minor change.	DM
29/09/21		Annual review – no change	DM
29/09/21		Annual review – no change	DM

Uncontrolled copy if not retained in designated folder on server

Authorised: Anthony Stander, Technical Director

Version 2022-1

Page 2 of 11

Date: 29 September 2022

SPPS16 Modern Slavery Policy

MODERN SLAVERY & TRAFFICKING POLICY

Policy Statement

This policy has been produced in accordance with the Modern Slavery Act 2015 and sets out the actions that Spoor-Tech Limited will take to understand potential modern slavery & trafficking risks related to its business activities and supply chains.

The following definitions are encompassed within the term 'modern slavery' for the purposes of the Modern Slavery Act 2015, these are:

- 'Slavery' is where ownership is exercised over a person.
- 'Servitude' involves the obligation to provide services imposed by coercion.
- 'Forced or Compulsory Labour' involves work or service extracted from any person under the menace of a penalty and for which the person has not offered himself voluntarily
- 'Human Trafficking' concerns arranging or facilitating the travel of another with a view to exploiting them.

Spoor-Tech Limited is committed to preventing modern slavery & trafficking in its business activities and its supply chains. Spoor-Tech recognises that a focus on tackling modern slavery not only protects vulnerable workers and helps prevent and remedy severe human rights violations, it also brings a number of business benefits too in regards compliance and reputation management.

The attached Modern Slavery Procedure details the actions that have been implemented, and will continue to be, with the aim of fulfilling this commitment.

This policy will be subject to review following any significant change event (eg change in workforce, employment conditions, supply chain), knowledge transfer, lessons learnt, identification of non-compliance and as a minimum annually.

As the person ultimately responsible for compliance in Spoor-Tech Limited, I approve this Modern Slavery & Trafficking Policy.



Anthony Stander, Technical Director, 29 September 2022

Uncontrolled copy if not retained in designated folder on server		
Authorised: Anthony Stander, Technical Director	Version 2022-1	Page 3 of 11
Date: 29 September 2022	SPPS16 Modern Slavery Policy	

PROCEDURE

Contents

Amendment Record	2
1. Organisation, Structure and Supply Chains.....	4
2. Policies in Relation to Slavery and Human Trafficking.....	4
3. Responsibilities for Modern Slavery and Human Trafficking Compliance.....	5
4. Due Diligence Processes.....	5
5. Risk Assessment and Management	6
6. Key Performance Indicators to Measure Effectiveness of Steps Being Taken	9
7. Training on Modern Slavery and Trafficking	9
8. Non-Conformity and Corrective Actions.....	9
Toolbox Talk – Modern Slavery And Human Trafficking	10

1. Organisation, Structure and Supply Chains

- 1.1 Spoor-Tech are civil and structural engineering contractors specialising in structural steelwork and architectural metalwork; civils, groundworks, and demolition; core drilling; and the provision of rail infrastructure labour.
- 1.2 The company employs 11 employees and circa 60 self-employed workers and contractors.
- 1.3 Spoor-Tech is a Limited Company, registered in England, and owned by the company's Directors who are actively involved in the business operations. The Company Directors are named in Companies House.
- 1.4 The company's supply chain comprises the supply of construction materials and work equipment, office equipment and ancillaries. The majority is purchased from UK based retailers or manufacturers.
- 1.5 The business operating model is based on standard civil engineering and rail industry enquiry processes and contract conditions.

2. Policies in Relation to Slavery and Human Trafficking

- 2.1 Whilst Spoor-Tech Limited is not a large company and thus not covered by some of the specific requirements of the Modern Slavery Act, the company recognises its legal and moral obligations, and its obligation to contribute to clients who are large companies due diligence programmes.
- 2.2 This Modern Slavery Policy is delivered through a range of associated policies and procedures:

Uncontrolled copy if not retained in designated folder on server		
Authorised: Anthony Stander, Technical Director	Version 2022-1	Page 4 of 11
Date: 29 September 2022	SPPS16 Modern Slavery Policy	

- SPPP01 Business Management System Manual: Procedure PP01-06 Control of Outsourced Activities
- SPPP01 Business Management System Manual: Procedure PP01-04 Human Resources Management - Recruitment
- SPPS02 Corporate Responsibility, Ethics, and Sustainability Policy
- SPPS08 Work Safe & Whistleblowing Policy

3. Responsibilities for Modern Slavery and Human Trafficking Compliance

- 3.1 Technical Director has ultimate accountability for ensuring prevention of modern slavery and human trafficking. This responsibility includes for ensuring the adequate provision of human resources, including for employment contracts, working conditions, employee salary, employment rights, health and safety and for implementing investigations into non-compliance.
- 3.2 Rail Compliance Coordinator is responsible for checking that employees have the right to work in the UK and for checking that suppliers are evaluated for modern slavery risk.
- 3.3 Operations Manager is responsible for control of working hours and fatigue management.
- 3.4 Finance Managing is responsible for ensuring that supply chain payments are made within contractually agreed time periods.
- 3.5 Project Managers are responsible for the appointment of competent and trustworthy suppliers, for agreeing ethical supply terms and conditions, and for supply chain performance monitoring.
- 3.6 Workers are responsible for maintaining diligence in identifying potential signs of modern slavery and for reporting this to Site Supervisors / Directors.

4. Due Diligence Processes

- 4.1 As described in Section 5 Risk Assessment and Management below.

5. Risk Assessment and Management

5.1 Internal Direct Risks

5.1.1 The key direct internal risks of Modern Slavery to Spoor-Tech are detailed in Table 4.1 below:

Table 5.1.1 Modern Slavery Direct Internal Risks

Issue	Risk
No Contracts of Employment	No contract of employment means that the rights of the worker are undefined or unclear.
Zero Hours Contracts	Zero hours contracts produce uncertainty of if or when working will be provided and can include restrictive clauses preventing the worker working for other employers.
Under Pay – Living Wage	Under pay of workers means that workers are not receiving a living wage, and thus cannot meet their own expenditure and welfare needs.
Under Pay - Market Rate	Under pay of the sector’s average market rate means that workers are not being adequately recompensed for the work they are doing, which can lead to dis-satisfaction and mental health impacts.
Late Payment of Invoices	Late payment of invoices can create cash flow problems in the supplier’s company which can lead to pressure on paying their own staff or supply chain.
Excessive working hours	Working excessive working hours, defined by the NHS as working greater than 56 hours per week, or not providing suitable rest periods – 20 minutes for every 6 hours worked, 11 hours between shifts, one day off per week, and adequate changes between day and night shifts, can lead to tiredness and fatigue with links to impacts on physical health, mental health, awareness, and safety.
Entitlement to Work in Country of Employment	Lack of entitlement to work in the country of employment means that the worker is working without authority or permit and may be subject to forced expulsion from the country with no rights.
Working in poor physical working conditions	Work in poor physical working conditions, including in workplaces with poor arrangements for health, safety and welfare, can lead to work-related injury and ill-health.
Bullying, discrimination, victimisation	Poor social conditions in the workplace can lead to mental health conditions, and potentially physical attack.

Issue	Risk
and harassment in the workplace.	

5.1.2 To tackle the above risks, Spoor-Tech has implemented the following risk control measures as detailed in Table 4.1 below:

Table 4.1.2 Modern Slavery Internal Risk Control Measures

Issue	Risk
No Contracts of Employment	All direct employees have full contracts of employment.
Zero Hours Contracts	PAYE are on salaried contracts. Site Workers are CIS self-employed and are paid for the contractually agreed shift length.
Under Pay – Living Wage	All employers are paid the current living wage for the geographic region they work in.
Under Pay - Market Rate	All workers are paid at least the agreed sector’s average market rate.
Late Payment of Invoices	Supplier are paid within a timely manner, typically within 30 days.
Excessive working hours	The Directors will ensure that adequate human resource is provided to achieve business, customer and other interested parties needs and expectations. All employees sign Working Hours Opt Agreements. No worker will be forced to working excessive working hours. Where longer working hours are required to achieve business objectives then a fatigue risk assessment shall be undertaken by the Labour Coordinator, and the risk shall be demonstrated to be as low as reasonably practicable. Compensatory rest shall be provided as soon as possible.
Entitlement to Work in Country of Employment	Individuals have the right to work in the country of employment. Evidence of right to work in the UK is received by the Rail Compliance Coordinator eg UK Passport or UK Birth Certificate, Work Permit or other suitable evidence recognised by UK Borders Agency.
Working in poor physical working	Safe and healthy working conditions for the prevention of work-related injury and ill health shall be provided.

Issue	Risk
conditions	The company has an established health and safety policy and management system.
Bullying, discrimination, victimisation and harassment in the workplace.	Bullying, discrimination, victimisation and harassment is not permitted or tolerated in any form. SPPS04 Equality, Inclusion and Diversity Policy establishes the processes for preventing and combating this.

5.2 Due Diligence in the Supply Chain

Note: In regards our supply chain our company is a medium sized company and thus our ability to influence the supply chain is limited.

5.2.1 We implement due diligence in our supply chain in relation to modern slavery:

- Our subcontractor evaluation form requires sub-contractors to declare their conformity to the Modern Slavery Act.
- Our contractual requirements require that modern slavery is not permitted.
- All our direct suppliers are UK based. The majority are large national organisations.
- In the unlikely event of us directly procuring products or services from high risk countries, we will undertake additional due diligence regards modern slavery.

5.3 Customer Partnership Expectation

5.3.1 We expect our customers to deliver the same ethical treatment of us as a supplier, particularly regarding:

- Providing realistic schedules of rates, to ensure that financial resources are provided to achieve compliance obligations.
- Provide realistic lead-time so adequate resource planning can be implemented to avoid fatigue.
- Conformity with payment terms and conditions, and timely payment of applications.
- Providing safe and healthy working conditions for the prevention of work-related injury and ill health.
- Ensuring that no bullying, discrimination, victimisation, and harassment is permitted or tolerated in the workplace.

6. Key Performance Indicators to Measure Effectiveness of Steps Being Taken

6.1 The risk control measures shown above shall be monitored as part of the annual strategic management review process.

7. Training on Modern Slavery and Trafficking

7.1 Directors are communicated their roles and responsibilities in relation to the elimination of modern slavery and trafficking through the communication of this Modern Slavery and Trafficking Policy.

7.2 Non-Managerial Workers are communicated awareness of modern slavery and trafficking issues at New Employee Induction, through Toolbox Talks (Appendix A) and inclusion in Employee HSQE Handbook.

8. Non-Conformity and Corrective Actions

8.1 Should an occurrence or potential occurrence of modern slavery be identified, either internally related to employment practice or working conditions or externally with the supply chain then appropriate corrective action shall be taken in line with the company's Procedure Control of Non-Conformity [PP01-09].

8.2 The Directors will appoint a competent investigator, usually the external HSQE Advisor.

8.3 All non-conformities shall be recorded, and the required actions implemented in a timely manner.

8.4 The following regulatory authorities / services have responsibility for modern slavery and trafficking. Where parties do not stop anti-modern slavery practices then the company Whistleblowing Policy will be enacted, and the authorities informed.

Regulatory Authority / Service	Website	Telephone
Modern Slavery	https://www.modernslaveryhelpline.org/report	08000 121 700
Advisory, Conciliation and Arbitration Service (ACAS) – Employment Issues	https://www.acas.org.uk/contact	0300 123 1100
Crimestoppers	https://crimestoppers-uk.org/give-information/forms/give-information-anonymously	0800 555 111

END

TOOLBOX TALK – MODERN SLAVERY AND HUMAN TRAFFICKING

Modern Slavery can take many forms including the trafficking of people, forced labour, servitude and slavery. Modern Slavery is immoral and illegal.

We ensure that our workers are not treated as modern slaves. We ensure they are:

- paid at least the industry rate for that role,
- have employment contracts,
- have the right to work in the UK,
- have their health, safety and welfare protected,
- aren't expected to work excessive hours,
- and are looked after, and
- are free from bullying, harassment, victimisation and intimidation.

Other organisations however don't have the same ethics, and we could find ourselves targeted by unscrupulous traffickers and illegal or unlicensed gangmasters offering a ready supply of labour at knocked down rates or find ourselves working on sites alongside modern slaves.

Victims of this crime are often Eastern European, Central Asian or African people who are promised a job in the UK and then forced by traffickers to work as labourers for little or no money. Through threat, violence or coercion they may be forced to live in squalid accommodation and have their identity documents or passports taken from them.

To avoid this, if we are using indirect labour, either self-employed, from gangs or from labour agencies, we will always require them to declare that they are complying with the Modern Slavery Act requirements and to prove the workers' right to work in the UK.

We might however find ourselves working alongside other gangs who are using forced labour. Some ways of identifying modern slavery are:

- *Transport:* Are a group of workers dropped off or picked up at unusual times of the day, are they all taken to the same property?
- *Appearance:* Do the workers look malnourished, unkempt, or appear withdrawn? Do they have few personal possessions and often wear the same clothes? What clothes they do wear may not be suitable for their work.
- *Medical Care:* Does the person have old or serious untreated injuries? Have they delayed seeing a healthcare professional, and are they vague, reluctant or inconsistent in explaining how the injury occurred?
- *Behaviour:* Are the workers withdrawn or appearing frightened, unable to answer questions directed at them or not speaking for themselves and / or an

Uncontrolled copy if not retained in designated folder on server		
Authorised: Anthony Stander, Technical Director	Version 2022-1	Page 10 of 11
Date: 29 September 2022	SPPS16 Modern Slavery Policy	

accompanying third party speaks for them? If they do speak, are they inconsistent in the information they provide, including basic facts such as the address where they live? Do they appear under the control / influence of others and rarely interact with colleagues?

- *Fear of Authorities:* Is the person afraid of the authorities, for instance police, immigration, the tax office, safety auditors? Are they scared of removal or what might happen to their families?
- *Debt Bondage:* Does the victim perceive themselves to be in debt to someone else or in a situation of dependence? Are they paid in cash?

If you identify possible slavery on a site that you are working on tell your manager and we will report it to the Client.

If in other circumstances you think you've identified a trafficker or illegal gangmaster you can call the police on 101, or the Modern Slavery helpline on 0800 0121 700 or visit www.modernslaveryhelpline.org.

Should you have any concerns or require any advice on the above feel free to contact a member of the management team.

END

Uncontrolled copy if not retained in designated folder on server		
Authorised: Anthony Stander, Technical Director	Version 2022-1	Page 11 of 11
Date: 29 September 2022	SPPS16 Modern Slavery Policy	