



## G&D HIGGINS MECHANICAL SERVICES LTD POLICY DOCUMENT NO 91

### Modern Slavery Statement

#### Overview

The Modern Slavery Act 2015 requires commercial organisations supplying goods or services with a turnover of above £36 million to prepare and publish an annual

'Slavery and Human Trafficking Statement'. The Statement must set out the steps an organisation has taken, if any, during its financial year to ensure that slavery or human trafficking is not taking place in its supply chain.

Although G&D Higgins does not have this turnover, we still feel it is important to audit our behavior, practices, suppliers and train all our staff to be aware of this horrible practice.

#### What is Modern Slavery?

Modern slavery is an international crime, affecting an estimated 29.8 million slaves around the world. It is a growing global issue that transcends age, gender and ethnicities. It includes victims who have been brought from overseas and vulnerable people in the UK, who are forced to illegally work against their will across many different sectors such as agriculture, hospitality, construction, retail and manufacturing policy

The firm is working towards establishing a zero-tolerance position on violations of anti-human trafficking and anti-modern slavery laws. If we find breaches of these laws within our supply chain, we will look to support companies in their efforts to comply with the legislation. We will not use these companies if they cannot change their practices.

Our CLEAR values: Collaboration, Leadership, Excellence, Agility, Respect, and Responsibility will underpin our culture and how we do business. They are embedded throughout our business and set the parameters, for how we expect people to behave with their colleagues, clients and the world at large. We seek to treat everyone fairly and consistently, creating a workplace and business environment that is open, transparent and trusted. Our policies and procedures relating to the Modern Slavery Act are in line with our culture and values. Our structure and supply chains are in the UK only.



## HOW WE CAN DO THIS

We have several procedures in place that contribute to ensuring modern slavery does not occur in our business or supply chains.

### Employment:

1. Robust recruitment processes in line with UK employment laws, including:
2. 'right to work' document checks; contracts of employment and checks to ensure everyone employed is 16 and above. An active and recognised Apprenticeship Scheme.
3. Market-related pay and reward, which is reviewed annually and linked to
4. professional services firms' benchmarks.
5. An enhanced benefits package, providing additional health and welfare options to support our people's (and their families) lifestyle choices.
6. Transparency in our supply chains:

We recognise our firm is exposed to greater risk when dealing with its suppliers, particularly those who have operations/ suppliers in other territories. The following measures to review and manage this risk are in place:  
Examination of our supply chains according to location, size and industry, to identify potential indicators of slavery.

Of these:-

100% are located within the UK or other low risk countries.

75% are companies with an annual turnover of > £36m, and are therefore covered by The Modern Slavery Act

11 % construction.

We have a commitment to collaborate closely with suppliers, to help their understanding and work towards their own obligations under the Modern Slavery Act.

G&D Higgins has a Responsible Purchasing Policy, which reflects our commitment to and focus on suppliers' ethical supply chain(s).

A Supplier Code of Conduct, which is used for all new major suppliers of goods or in retendering, clearly stating the firm's intention to step away (without penalty) if any occurrences of modern slavery are discovered.



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Both the Responsible Purchasing Policy and Supplier Code of Conduct will be, reviewed annually and updated as and when deemed appropriate by G&D Higgins Mechanical Services Ltd to ensure they are continually developed and remain fit for purpose.

**Employee training:**

We want to help our people to understand more about this growing issue and how to report any suspicions they may have, whether in a business or in a personal context. We have highlighted the [modernslavery.co.uk](http://modernslavery.co.uk) site to all our employees, which holds useful information on how to recognise different types of slavery, how to spot the signs and provides details of a telephone helpline. We have developed resources and made them available to our people, including summary documents with an overview of the Modern Slavery Act, and links to the [modernslavery.co.uk](http://modernslavery.co.uk) site.

**Reporting knowledge or suspicion of slavery:**

We, already have in place a whistleblowing hotline which ensures that anyone who has concerns, for example, about how partners or staff are behaving, has a means of raising their concerns confidentially. Our hotline is now also available to report any suspicions our employees may have regarding modern slavery and our employees have been signposted to this in our communications.

**LOOKING FORWARD AND GOING FORWARD will WILL AIM TO ORK TOWARDS:-**

We will aim to develop an employee training module that will be undertaken by all employees. This training will outline what modern slavery is, how to identify it and what individuals should do if they suspect there are any cases of slavery occurring. Completion of this training will form a compulsory part of our employees' annual review and new starter induction processes and site inductions.

Developing a procedure to monitor how our suppliers comply with our Supplier Code of Conduct.

**LR Higgins Director of G&D Higgins shall take responsibility for this statement and its objectives which will be reviewed and updated as appropriate.**

*Linda Rose Higgins*

Linda Higgins  
DIRECTOR  
Reviewed 10/10/2019