Modern Slavery Statement – 2018

Introduction

This statement is made in accordance with the Section 54 (1) of the Modern Slavery Act 2015. It constitutes Complete Cover Group Ltd (CCG) slavery and human trafficking statement for the financial year ending 31st December 2018 and continues to apply until any amendments are required.

Our Organisation

CCG is an established insurance broker providing car, van, taxi and home insurance policies. CCG is dedicated to ensuring all practices carried out respect the protection of basic human rights and are compliant with relevant legislation. We believe there is minimum risk of modern slavery or human trafficking as we operate a zero-tolerance approach and do not condone or facilitate modern slavery or human trafficking ourselves or through any of our partners. Our staff are largely directly employed and are not in any category which is generally seen to be vulnerable to modern slavery in this country, so our focus is to ensure there are policies and procedures in place for our contractors and suppliers.

Supply Chain

CCG is committed to continuously improving its practices to identify and eliminate any slavery and human trafficking in its business and supply chains, and to acting ethically and with integrity in all its business relationships. All insurers are authorised by and regulated by the Financial Conduct Authority or an equivalent regulatory body. This includes those insurers who operate within the European Economic Area (EEA). To the best of our knowledge, none of our supply chain is associated with modern slavery nor trafficking. It is our expectation that all our partners are fully compliant with both UK regulation and law including adherence to: (a) the core International Labour Organisation (“ILO”) standards which ban the use of child labour and forced compulsory or bonded labour (including where the threat of penalty or discipline is used to compel work), whilst protecting rights to non-discrimination; and (b) the non-core ILO standards which include statements that workers should have safe and hygienic working conditions, a living wage should be paid, working hours are not excessive and abuse and intimidation are prohibited.

Policies

CCG has a number of policies which aim to minimise the risk of modern slavery in our supply chain. These include:

- Limiting the use of third parties – which sets out internal requirements for buying goods and services from third parties;
- Procurement Policy – covering issues of human rights, child and forced labour and modern slavery, which CCG’s suppliers are required to comply with.

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Due Diligence and Risk Assessment

We continue to monitor suppliers we believe present high modern slavery risks in our supply chain. We vet our partners and their procedures both at the start and routinely throughout our relationship.

We have an established procurement process for third-party relationships outlined within our Outsourcing Policy we have developed a risk-based approach to assess the likelihood of modern slavery occurring in our supply chain, focusing on the key service provisions we receive across both our direct and indirect supply chains. The criteria used for this approach takes into account many factors including the geographical location from which services are provided, length of the supply chain, use of migrant or temporary labour and the nature of the goods or services being supplied. It is our expectation that our partners operate to the same standards.

Training

During the year, we have continued to provide advice and guidance to those teams who have direct responsibility for relevant supply chains and our Procurement team has participated in further modern slavery training. We also maintain a Modern Slavery Act Guidance document which is available to staff through CCG’s intranet. All employees will also read this statement as part of their induction.

Looking ahead

We will continue to work to embed understanding of modern slavery in our supply chain and business to raise awareness of modern slavery. In doing so we will be reviewing and evaluating the measures and processes that we have implemented thus far and considering additional measures we can take as a business. Through working with our suppliers, we aim to prevent modern slavery occurring in our business and supply chain.

Board / CEO

This statement has been formally approved by the board who is dedicated in supporting the eradication of modern slavery and human trafficking.

Angela Darling
Group Compliance Director
31 December 2018

Please see our previous policy wording here