

An important update from Bagnalls regarding the COVID-19 situation and our response to protect our employees and customers. Please take a look at our [latest statement](#).



## Modern Slavery Act

This statement demonstrates the steps Bagnalls has taken and continues to take to eliminate the risks of slavery, forced labour, human trafficking, and exploitation, within our business and that of our supply chain.

Bagnalls' policy on Human Rights and Labour Conditions has been updated to reflect our responsibilities under the Modern Slavery Act, 2015.

We recognise that our responsibility for human rights, labour conditions and anti-slavery encompasses:

- **Our Group and Branch Network**– Our staff are directly employed and based in the UK. We do not normally undertake work overseas. We are a fair employer and ensure that our company values and policies are communicated to all employees.
- **Our Supply Chain**– It is our aspiration that the working conditions throughout our supply chain meet internationally accepted standards of human rights and working conditions. Audit and assessment processes are carried out across our supply chain.
- **Our Customers**– We are an ethical business and continue to meet the high standards of our customers by achieving the required assessment criteria and meeting the demands of independent, external audits. We also comply with customers' Codes of Conduct and policy requirements.

### Meeting the Requirements of the Modern Slavery Act, 2015

- We believe that all our employees are responsible for helping to ensure that we operate free from human trafficking, human rights abuses, slavery, and forced labour.
- Colleagues are encouraged to bring forward, in confidence, concerns that they may have about any abuse, via our Whistleblowing Policy.
- The Board of Directors have overall responsibility for demonstrating, through clear and visible leadership, that human rights are integral to the way we do business.
- The Directors are also responsible for monitoring compliance with the policy in all aspects of our business.
- Managers and supervisors provide visible leadership that promotes human rights as an equal priority to other business matters.

### Internal Processes

We undertake the following steps to prevent slavery, forced labour, human trafficking and exploitation in our business:

- Conducting checks to ensure our employees have the right to work in the UK before commencing employment with us;
- Directly employing rather than using agencies to provide labour, wherever possible;
- Paying wages which exceed the minimum wage;
- Promoting the Whistleblowing Policy to all employees to encourage them to report concerns about slavery, forced labour, human trafficking, exploitation, or other human rights abuses; and
- Providing training to employees to understand the issues of forced labour, slavery, and trafficking and what they should do if they suspect these issues may be occurring on sites where they work.

### **Vetting our Supply and Subcontract Chain**

We acknowledge our duty to continually review and monitor:

- Our supply chain; and
- Our subcontractors.

The Government has recognised the construction sector as being a high-risk industry for modern slavery and associated issues. As such, our immediate focus is vetting and monitoring those subcontract companies who supply us with specialist labour trades to support our contracts.

To this end, we have undertaken to:

- Update our approved supplier/subcontractor vetting process;
- Ask all current subcontractors/suppliers to detail their processes for vetting their labour and what steps they have taken to prevent slavery, forced labour, human trafficking, and exploitation in their business and that of their supply chain;
- Develop long-term relationships within our supply chain with those companies/individuals who hold similar values to ourselves;
- Remove subcontractors/suppliers from site and/or our approved suppliers' list where concerns are raised, until further investigations take place.

### **Focused Objectives**

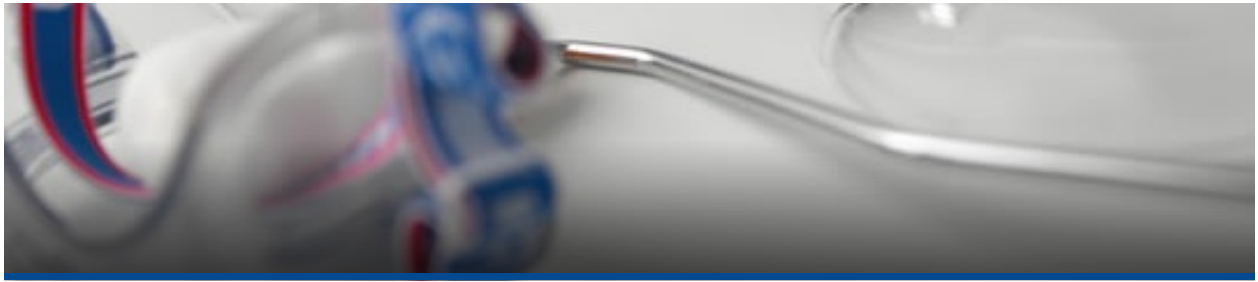
- We have set a target of maintaining training to 100% of our permanent employees, in relation to modern slavery by June 2021.
- We have set a target of maintaining 100% compliance by June 2021, for subcontract companies supplying us with specialist labour and key suppliers of products to complete a questionnaire which details their vetting processes in relation to modern slavery.
- We will continue to monitor the effectiveness of our training and vetting processes, making changes where necessary to remain legally compliant and to demonstrate best practice as a responsible employer.

**Stephen Bagnall**

**Group Managing Director**

**18.6.20**





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