

# Modern Slavery & Human Trafficking Policy Statement



## Section 1. Introduction

As a professional consultancy business, SHEQworx is committed to acting ethically, with integrity, and transparency in all of its business dealings and relationships to ensure modern slavery and human trafficking are not taking place anywhere within its own business or in its supply chain, consistent with its obligations under the Modern Slavery Act 2015 (s 54). SHEQworx has a zero-tolerance approach to modern slavery and human trafficking.

Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers. It can take many forms such as slavery, servitude, forced or compulsory labour and human trafficking.

It is noted that many businesses unintentionally support slavery and human trafficking through the procurement of products and services through their supply chain, which have been sourced, manufactured, and secured without recognition of the conditions under which individuals have been forced to deliver.

There is a spectrum of abuse that befalls the victims of modern slavery, and identification of such victims can be challenging because the crime can present itself in many different forms. For example, poor working practices and lack of health and safety awareness have become instances of human trafficking, as have slavery, or forced labour in a work environment. It is understood that some suppliers will go to great lengths to hide the fact that they are using slave labour.

SHEQworx expects its suppliers, contractors, and other business partners to observe the laws pertaining to Modern Slavery and operate a similar zero-tolerance policy.

## Section 2 Our Organisation's Structure & Business Activities

SHEQworx employs less than 5 people with its business operating from one central office, in Wetherby, West Yorkshire.

Everything is controlled, managed, and reviewed from this one location, and due to the small close-knit working environment, open discussions are commonplace, with all critical decisions undertaken by the Managing Director. The Managing Director has overall responsibility for ensuring this policy complies with the Company's legal and ethical obligations.

Our business activities are predominantly consultancy and training services under the overarching umbrella of risk management and legal compliance, focusing on many aspects related to the Occupational Safety, Health, Environment and Quality (SHEQ) aspects of business activities, from the development and auditing of management systems through to offering contract support on major projects in the UK.

# Modern Slavery & Human Trafficking Policy Statement



Rail is our specialist subject. We use our knowledge and experience to support our customers. Our work can take us onto client construction sites, into their offices, and external training venues such as conference suites in hotels, and/or in our own offices.

## Section 3 Supply Chain

In operating our business and delivering our contract requirements to our customers, we use a very limited number and type of suppliers, preferring to 'shop local' wherever possible to support the local rural economy, and benefit from the relationship-building this affords.

For physical goods and products, we have identified office equipment and stationery supplies including consumables, personal protective equipment, and the occasional company vehicle.

When considering the provision of services, we have identified the maintenance and repair of IT equipment, various computer software programmes, and utilities including telephone and broadband.

We occasionally hire contractors for their specialist expertise for IT software development and training.

We have not had cause to use agency labour to provide services on our behalf to date.

## Section 4 Policies & Due Diligence

SHEQworx accepts that we have a responsibility through our due diligence processes to ensure that workers are not being exploited, that they are safe, and that relevant employment, health and safety, and human rights laws and standards are being adhered to, including the freedom of movement and communications.

As a relatively small organisation, we seek to comply with the principles of the UN Global Compact, the UN Universal Declaration of Human Rights, and the fundamental conventions of the International Labour Organisation.

Our commitment to take a stance against human rights abuses in the construction industry, can be observed through our Whistleblowing Policy and our Equality, Diversity, and Inclusion Policy. These Policies are accessible to all staff.

This Policy Statement applies to all individuals working for SHEQworx or on the Company's behalf in any capacity, including employees, directors, officers, agency workers, volunteers, agents, contractors, consultants, and business partners.

# Modern Slavery & Human Trafficking Policy Statement



As an organisation we strive to continually improve our systems and procedures. To this end, we shall endeavour to strengthen our procurement process by requiring any new suppliers to complete a modern slavery risk assessment questionnaire to identify potential risk areas. This will form the basis of any future discussions before deciding if they become a supplier to us. We intend to retrospectively issue the questionnaire to our existing suppliers and process the responses fully.

## Section 5 Training & Recruitment

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chain and business overall, SHEQworx has provided training to its staff to raise awareness, prevent, detect, and report any instances where modern slavery may become apparent.

If there is any uncertainty about a particular act, or treatment of workers, or their working conditions within any of our business activities or that of our suppliers, it is to be raised with the Managing Director. The Government's Modern Slavery Helpline on 0800 012 1700 can be contacted for further information and guidance.

SHEQworx will continue to encourage openness and will support anyone who raises genuine concerns in good faith under this or other supporting policies.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps we have taken to eradicate slavery and human trafficking in our business and supply chains.

### AUTHORISATION

A handwritten signature in blue ink that reads "Andrea Dodds". The signature is fluid and cursive.

**Andrea Dodds**  
**Managing Director**

11<sup>th</sup> December 2020