



# Modern Slavery Statement

SIMPSON (York) Ltd acknowledges and accepts its obligations under the Modern Slavery Act 2015, Part 6 Section 54 Transparency in Supply Chains, and is committed to preventing slavery and human trafficking within its business and its supply chains.

This statement sets out the Company's actions to understand all potential modern slavery risks related to our business and the steps we have taken to ensure that there is no known slavery or human trafficking within our own business and associated supply chains.

Whilst the risk may be small, we all have a responsibility to be alert to the risks. All staff are expected to report concerns and the Senior Management Team are expected to act upon them.

## Organisational Structure and Supply Chain

Simpson (York) Ltd is a privately owned limited company, engaged in all aspects of fit out and construction within the UK, the Company does not have offices or conduct operations outside of the UK.

The Company uses supply chain partners for both goods and services in order to undertake fit out and construction projects which are predominantly UK based. The Company and our supply chain partners may source goods and services from outside of the UK.

## Relevant Company Policies

Our Modern Slavery Statement reflects our commitment to acting ethically and with integrity in all our business relationships, and to implementing and enforcing effective systems and controls to prevent slavery and human trafficking in our supply chains. The Company operates the following policies that support our commitment to mitigate the risk of Modern Slavery and Human Trafficking within the business and its operations:

- **Whistleblowing Policy** - encourages all its workers, clients and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. The organisation's whistleblowing procedure is designed to make it easy for workers, clients or others to make disclosures, without fear of retaliation.
- **Ethical Procurement Policy** - states the organisations commitment to dealing fairly, evenly and professionally with our suppliers
- **Right to Work** – details the checks undertaken to ensure operatives have the correct documentation to support their right to work in the UK.

## Due Diligence

From the date of this statement slavery and human trafficking enquiries will be made into any new supplier engagements. This process will include, in any new contractual documentation issued by the company, a requirement that our suppliers confirm their compliance with the Modern Slavery Act 2015.

With regards to national or international supply chains, our point of contact is preferably with a UK company or branch and we expect these entities to have suitable anti-slavery and human trafficking policies and processes in place.

Simpson (York) Ltd. will not support or deal with any business knowingly involved in slavery or human trafficking.

## Performance Indicators

We use the following key performance indicators (KPIs) to measure how effective we have been in preventing slavery and human trafficking in any part of our business or supply chains:

- Completion of Modern Slavery and Human Trafficking training/awareness across the whole business.
- Use of labour monitoring and site inductions and payroll systems for our own staff.
- CSCS Card monitoring/random checks and site inductions for our sub-contractors.
- Good levels of communication and personal contact with the supply chain and their understanding of, and compliance with, our expectations (use of Constructionline and other recognised industry bodies as appropriate).

## Training

Completion of in-house training (based on the Home Offices' Human Trafficking Practical Guide) and testing, to ensure a level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business. We provide training to all members of staff at new starter induction, and the subject is also covered as part of ongoing site inductions for staff and sub-contractors.

## Awareness Raising

In addition to formal training, posters and flyers will be distributed for addition to office and site notice boards, these will include:

- The principles of the Modern Slavery Act 2015.
- How to identify modern slavery and human trafficking.
- What to do if they have a potential modern slavery or human trafficking issue.
- Details of the Modern Slavery Helpline (0800 0121 700).

## Further Information

Full Act

[http://www.legislation.gov.uk/ukpga/2015/30/pdfs/ukpga\\_20150030\\_en.pdf](http://www.legislation.gov.uk/ukpga/2015/30/pdfs/ukpga_20150030_en.pdf)

Human Trafficking Practical Guidance

<https://www.gov.uk/government/publications/human-trafficking-practical-guidance>

Transparency in Supply Chains

[Slavery and human trafficking in supply chains: guidance for businesses - Publications - GOV.UK](https://www.gov.uk/government/publications/slavery-and-human-trafficking-in-supply-chains-guidance-for-businesses-publications-gov-uk)

Modern Slavery Website

<https://modernslavery.co.uk/>

**RC GATENBY**  
**CHAIRMAN & CHIEF EXECUTIVE**  
For the Financial Year 2017/18