Modern Slavery Act

This statement has been approved by the VGC Group board of directors and has been published in accordance with the Modern Slavery Act 2015. The hard copy has been signed by Laurence McKidd, CEO. It will be reviewed annually (next review December 2023).

Structure, Business & Supply Chains

VGC provide skilled people and deliver civil engineering projects to the UK's leading infrastructure contractors.

We are committed to working within our own business and our supply chain to ensure ethical business practices are operated and to tackle hidden labour exploitation.

Modern slavery is a criminal activity and a violation of human rights, and we all have a responsibility to prevent modern slavery and human trafficking happening within our business and supply chains.

Policies

Our accredited business management system makes sure that we operate fair and transparent systems, compliant with all areas of UK legislation. They include policies on:

- Modern slavery
- Recruitment
- Prevention of illegal working
- Fatigue
- Purchasing and supplier approval
- Sub-contractor management
- Anti-bribery
- Mental health and wellbeing

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- Whistleblowing
- Corporate social responsibility

Identification of risks, prevention, and management

We are doing everything we can to combat modern slavery and labour exploitation and continue to review the risks within our business and our supply chain.

Steps already in place to prevent and manage that risk are:

Recruitment

- Interviews with all workers to gauge willingness, ability, and qualifications to carry out the specific job role for VGC.
- Stringent verification of identity documents and right to work in the UK documentation carried out by trained staff and electronic document verification through a home office accredited provider.
- Reference checks on all workers
- An induction providing information to workers on statutory rights and company policies and procedures
- Provision of key information documents detailing pay arrangements

Staff support

- Transparent and detailed terms of engagement provided to all workers
- Detailed pay-slips provided weekly
- Wages are paid into personal bank accounts
- Fair access to training, development, and promotion opportunities

Modern Slavery Awareness

- Delivery of modern slavery training sessions and stand down days for site staff
- Delivery of a bespoke modern slavery presentation to head office staff focusing on areas of risk, spotting the signs and how to report
- Posters displayed in multiple languages in welfare facilities
- Pay slip messages
- Social media and staff e-news updates

Due Diligence in business & supply chain

VGC were the first labour/personnel agency to achieve the BRE 6002:2017 accreditation for Ethical Labour Sourc

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2018 which demonstrates our commitment to ethical, transparent, and fair recruitment sourcing and business management strategies. With a continuous improvement and action plan in place we were recently reaccredited in October 2022. In October 2022 we also gained accreditation to the Achilles Ethical Employment certification.

In developing our strategy and policy in relation to modern slavery we have taken the following steps:

- Our chief operating officer was named one of the top 100 Modern Slavery influencers and engages with main contractors and the Gang masters and Labour Abuse Authority (GLAA) and the Recruitment and Employment Confederation (REC) to work collaboratively with other industry partners on the prevention of modern
- We include modern slavery questions in our pre-qualification supplier's questionnaire form.
- Due diligence monthly reports on workers checking for the following:
  - duplicate bank account details
  - duplicate employment referees and next of kin
  - houses with multiple occupancy
- Refresher documentation verification training was carried out by the Metropolitan police to all staff involved in recruitment and compliance on how to check the validity of identity
- We carry out periodic internal audits on high-risk groups as defined by the GLAA.
- We have trained key influencers and staff at project level in spotting the signs of Modern Slavery and our reporting

Tackling modern slavery plan of action

Existing VGC practises

- Published MSA policy
- Signatory to GLAA Construction protocol
- Continue accreditation to Ethical Labour Sourcing Standard
- Face to face recruitment and onboarding
- Right to work checks (with trainng by UKBA)
- Salary paid into personal bank account
- MS awareness training for staff on how to spot the signs and whistleblowing
- MS corporate film produced

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- Fair access to training, development and promotion
- Multi-lingual modern slavery awareness posters
- MS covered in supplier approval process including supply chain management and procurement
- MS audit carried out by HSQE team on high risk indicators
- Unseen app on company mobile phones

2022 activities

- Shared VGC experiences and processes at client and supply chain events.
- Continued to deliver training and briefings on MS awareness and spotting the signs across staff and sites – particulalry for HS2 projects
- Worked with SCS on their modern slavery strategy and working group including project wide briefings.
- Received a HS2 inspiration award for work in the prevention of modern slavery.
- Attendance at GLAA online meetings
- Ran reports from database to identify high risk indicators of MS including duplicate bank details, duplictae personal referees and next of kin and houses of multiple occupancy
- Used MS awareness film during inductions and training
- Provided MS updates in staff e-news and social media platforms
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2023 activities

- Update the staff induction pack with MS awareness
- Share VGC experiences and processes at client and supply chain events.
- Continue to deliver training and briefings on MS awareness and spotting the signs across staff and sites.
- Run a campaign to promote the Hand SOS signal to riase MS concerns.
- Continue to work with SCS on thie modern slavery working group.
- Attendance at GLAA online meetings
- Review progress against people matters charter
- Run reports from database to identify high risk indicators of MS including duplicate bank details, duplictae personal referees and next of kin and houses of multiple occupancy
- Use MS awareness film during inductions and training
- Provide MS updates in staff e-news and social media platforms
- Work with modern salvery survivors to achieve employment outcomes.

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- Deliver anti bribery and corruption training
- Develop a supplier code of conduct making specific references to MS policy and arrangements

Reporting

If you have any concerns in relation to Modern Slavery, it is essential that you report it. You can report it to VGC in confidence and anonymously.

- Report to VGC management: Ciara Pryce pryce@vgcgroup.co.uk or Laura Perry laura.perry@vgcgroup.co.uk
- Tell your VGC labour manager / project manager / recruitment consultant
- Use the whistleblowing form on the VGC website
- You can also report it directly to the authorities:
  - Modern Slavery Helpline 0808 801 0372 8am to 8pm 7 days a week
  - Download the Unseen.org
  - Protect – a whistleblowing helpline – 0203 117 2520

Do not try and deal with the situation yourself unless the person is in immediate danger. If there is immediate danger call the police on 999.

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Contact Us

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