



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 Ciara Pryce, CEO, on 31 January 2025. It will be reviewed annually (next review January 2026).

Structure, Business & Supply Chains

VGC provide expert and sustainable recruitment services to the construction industry.

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 Management
- Purchasing and supplier approval
- Sub-contractor management
- **Anti-bribery**
- **Mental health and wellbeing**
- **Whistleblowing**
- Corporate social responsibility
- Risk Register
- Criminal Finance Act Policy
- Supplier Code of Conduct

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
- Access to our EAP and wellbeing support services

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 it.
- 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 Sourcing Standard in 2018, demonstrating our commitment to ethical, transparent, and fair recruitment sourcing and business management strategies. In October 2022, we gained accreditation to the Achilles Ethical Employment certification, and in 2024, we were the first company to gain the CHAS Social Sustainability accreditation which is the first of its kind in the UK. Within these accreditations we maintain a continuous improvement plan. We were delighted to receive the HS2 inspiration award in July 2022 for our work in the prevention of modern slavery, and to be shortlisted in the Unseen awards in 2024.

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 Gangmasters and Labour Abuse Authority (GLAA) and the Recruitment and Employment Confederation (REC) to work collaboratively with other industry partners on the prevention of modern slavery. We are also a member of the Supply Chain Sustainability School working group for modern slavery prevention.

- 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 to all staff involved in recruitment and compliance on how to check the validity of identity documents.
- We carry out periodic internal audits on high-risk groups as defined by the GLAA.

Tackling modern slavery plan of action

Existing VGC practices

- Published Modern Slavery Awareness policy
- Signatory to GLAA Construction protocol
- Continue accreditation to Ethical Employment certification and Social Sustainability certification
- Continued site based awareness and training with toolbox talks and other activities
- Right to work checks
- Salary paid into personal bank account
- MS awareness training for staff on how to spot the signs and whistleblowing
- MS corporate film produced
- 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 on high risk indicators
- Unseen app on company mobile phones

2024 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 – particularly for HS2 projects
- Part for the Supply Chain Sustainability School Modern Slavery Prevention Leadership Group
- Collaborated with ten other industry partners to produce a short film with Unseen
- Completed our MSAT assessments
- Ran reports from database to identify high risk indicators of MS including duplicate bank details, duplicate 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
- Rolled out a Supply Chain Sustainability School learning pathway for all VGC personnel
- Completed a new supplier code of conduct.

2025 planned activities:

- Process
 - Review of the modern slavery risk assessments to ensure they cover all our activities and services in line with GLAA reporting and trends.

- Review of company procurement processes to ensure they address current modern slavery risks.
- Update the staff induction pack with modern slavery awareness processes.
- Review progress against people matters charter.
- Review of response plan and SLA's.
- Roll out PPE tender to facilitate supplier risk mapping activities
- Communication
 - Targeted communication campaigns on social media and e-news covering high risk indicators, reporting processes & SOS hand signal.
 - Review option for campaigns to be delivered in other languages.
- Training
 - Annual lunch and learn training session on modern slavery prevention. Ensuring this covers the 11ILO indicators including abuse of vulnerability, deception, restriction of movement, isolation, physical & sexual violence, intimidation & threats, retention of identify documents, withholding wages, debt bondage, abusive working & living conditions & excessive overtime.
 - All new starters within head office functions to complete the supply chain school modern slavery awareness e learning within 1 month of commencing work.
 - Use MS awareness film during inductions and training
 - Continue to deliver anti bribery and corruption training
- Industry engagement / best practice
 - Share VGC experiences and processes at client and supply chain events.
 - Continue to work with SCS on the modern slavery working group.
 - Attendance at GLAA online meetings
 - Work with modern slavery survivors to achieve employment outcomes.

Measurement

- New starters to complete modern slavery awareness training within 1 month.
- Social auditing – quarterly auditing on high-risk indicators of MS including duplicate bank details, duplicate contact numbers and next of kin and houses of multiple occupancy.
- Review of trends within whistleblowing reports
- Review of trends within disciplinary, grievance and feedback processes.

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.

- Raise the matter to VGC management: hr@vgcgroup.co.uk or to your VGC Labour manager. Your VGC line manager will escalate it immediately to HR.
- Use the [whistleblowing form](#) on the VGC website
- You can also report it directly to the following parties:
 - Modern Slavery Helpline 0800 0121 700 8am to 8pm 7 days a week Download the Unseen.org
 - Protect – a whistleblowing helpline – 0203 117 2520
- Download the Unseen app.

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.



Contact Us

 **0800 047 8118**

 **enq@vgcgroup.co.uk**

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