



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 2026. It will be reviewed annually (next review January 2027).

Structure, Business & Supply Chains

VGC is a leading recruitment partner to the UK infrastructure 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, forced or bonded labour, human trafficking and labour exploitation from 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**
- Social Impact
- 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 Processes

- 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 booklet in simple language 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 directly to workers individual payslip portal.
- 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

- Director-level lead oversees ethical governance, corporate responsibility, and modern slavery prevention.

- 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 has a strong track record in ethical recruitment and responsible labour practices. We were the first labour agency to achieve BRE 6002:2017 accreditation in 2018, followed by Achilles Ethical Employment certification in 2022 and the UK's first CHAS Social Sustainability accreditation in 2024. In 2025, we secured Workforce Assured re-accreditation for the second consecutive year and successfully completed 27 additional client and industry audits. These accreditations are supported by a continuous improvement programme.

Our commitment to preventing modern slavery has also been recognised through the HS2 Inspiration Award in 2022 and our shortlisting for the Unseen Awards in 2024.

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

- Our CEO was named one of the top 100 Modern Slavery influencers and continues to work collaboratively with main contractors, the Gangmasters and Labour Abuse Authority (GLAA) and the Recruitment and Employment Confederation (REC) on the prevention of modern slavery. We are also a member of the Supply Chain Sustainability School working group for modern slavery prevention.
- Modern slavery questions are included in our pre-qualification supplier questionnaire.
- Monthly due diligence reports on workers checking for the following:
 - duplicate bank account details
 - duplicate employment referees and emergency contact
 - houses with multiple occupancy

- phone numbers to identify if workers are contactable through one number
- Refresher documentation verification training is provided to all staff involved in recruitment and compliance on how to check the validity of identity documents.
- Periodic internal audits are carried out on high-risk groups as defined by the GLAA.

Tackling modern slavery – Existing practices and plan of action

Policies and Certifications:

- Published Modern Slavery Awareness Policy
- Annual completion of the MSAT assessment
- Signatory to the GLAA Construction Protocol
- Accredited to relevant Ethical Employment certifications

Training and Awareness:

- Modern slavery awareness training for internal staff and site-based teams, including toolbox talks
- Multi-lingual modern slavery awareness posters
- Corporate modern slavery film produced
- Use of the Unseen app on company mobile phones
- Guidance on spotting signs of modern slavery and whistleblowing
- Published the updated site staff induction booklet covering Modern Slavery

Worker Protections and Verification:

- Right to work and identity checks
- Salaries paid directly into personal bank accounts
- Refresher training on verifying identity documents

Supply Chain and Audits:

- Modern slavery considered in supplier approval, procurement, and supply chain management
- Audits on high-risk indicators within our workforce

Fair Practices:

- Equal access to training, development, and promotion opportunities

2026 planned activities:

- Process
 - Review of the modern slavery risk assessment 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.
 - Review of response plan and SLA's.
 - Continue our supplier risk mapping activities through procurement exercises
- Communication
 - Continue with 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.
 - New starters within recruitment roles to complete the supply chain school modern slavery awareness e learning within 1 month of commencing work.
 - Use of MS awareness film during inductions and training
 - Continue to deliver anti bribery and corruption training
- Industry engagement / best practice
 - Share VGC experiences and good practices to our Clients and at supply chain events.
 - Continue to work with Supply Chain School on the Built Environment Against Slavery (BEAS) modern slavery working group.
 - Attendance at GLAA or when enacted the Fair Work Agency online meetings

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
 - 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.

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Contact Us

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STAFF



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