

## **Introduction**

This statement has been published in accordance with Section 54(1) of the Modern Slavery Act 2015. It sets out the steps that Gatwick Construction Ltd has taken to prevent slavery and human trafficking taking place in any part of its business or that of its supply chain.

Gatwick Construction Limited is a specialised construction and engineering business delivering a wide range of project building and maintenance services to the UK Airport, Rail and Road Markets and have gained an enviable reputation for reliability, high quality work and excellent customer service.

We are an intuitive and fast-growing company, involved in a multitude of commissions throughout the UK, including high profile projects.

Factors that pose risk to the prevention of Modern Slavery within our industry

Statistics show that 47% of all potential victims in the UK Construction Industry, were trafficked into forced labour<sup>1</sup>. It is important that we recognise these statistics and make efforts to prevent them. Gatwick Construction act under the Construction Industry Scheme (CIS), as we outsource parts of our workforce. We strive to ensure that contracted staff benefit from the same policies as our direct employees, and that their wellbeing is equally as prioritised. Additionally, operating within the construction industry means that part of our workforce is subject to extended hours, out of hours, and physically demanding work. It is necessary to establish the individual has voluntarily chosen the field in which they work, and are not subject to back-to-back shifts, out of our provision and against their will.

## **Company structure and our responsibilities**

All workers have a responsibility to comply with the Code of Conduct and should be alert to the risks presented by Modern Slavery in our business and the wider supply chain. Staff are encouraged to report any concerns to management, who are expected to act upon them appropriately. The management structure within Gatwick Construction showcases how we all have a duty of care and responsibility towards our peers and colleagues.

Our Modern Slavery Team consists of members from key areas of the business, including Recruitment, HR, Operations, Health & Safety, and Compliance. The Team meet on a regular basis and are responsible for the way our business manages all aspects of Modern Slavery. They ensure due diligence of our internal processes, covering not only our supply chain, but also the recruitment, onboarding, training, safety, wellbeing and offboarding of all employed and contracted workers.

Our directors at Gatwick Construction play a crucial role in preventing Modern Slavery in the workplace by establishing policies, fostering a culture of transparency and responsibility, and ensuring compliance with relevant laws. The directors always lead by example by prioritising ethical decision-making.

Our departmental managers are consistently monitoring the working conditions and wellbeing of their staff, remaining vigilant during employee pre-employment checks and ensure training is completed and standardised across the board. Our department managers also act as a beacon to all staff, providing a safe and confidential contact to report any concerns.

The whole workforce have a duty to adhere to Gatwick Construction's Code of Conduct, and report any concerning behaviours. It is compulsory for everyone to undertake Modern Slavery awareness training to know what to look out for. The workforce at Gatwick Construction treat everyone with fairness and respect, creating a safe and happy environment for our co-workers, and providing a space to openly come forward without judgement.

### **Due diligence in our internal processes**

We undertake rigorous action to prevent Modern Slavery and human trafficking at Gatwick

- Construction throughout our day-to-day operation.
- During recruitment, candidates are prompted to apply through trusted job advertising sites, we have a thorough, end-to-end interview process where workers are asked to provide identification that match the contact details on the application, and we always carry out direct face to face checks.
- Every worker is subject to pre-employment checks to confirm their identity and ensure their right to work in the UK. This includes them being able to provide evidence that they are in possession of their own identification documents. Every worker is required to bring with them their passport on their first day, and only a copy taken by their employing manager is accepted as part of their check.
- Upon onboarding, and should any details change, we ensure that bank account details provided for payment match the name of the worker. If discrepancies arise, we investigate to ensure the worker is not subject to Modern Slavery. Where documents which link the employee with the payee cannot be provided, and in instances where more than one worker is being paid into a single bank account, it is escalated to Director level to investigate further.
- All workers are issued with written terms and conditions, they are given a copy for their own records, and can obtain another copy from our HR Department at any time, during and/or after the duration of their contract.
- All workers are provided with information about their statutory rights, including sick pay, holiday entitlements, parental leave, and any other benefits to which they may be entitled.
- In addition to our induction process, Modern Slavery training is mandatory for everyone. Any signs of potential victims will be verified by the directors on a confidential level. Our company induction also offers internal and external helplines should a worker wish to come forward for advice.
- As well as our whistleblowing policy, we provide workers with safe and confidential spaces to obtain financial, legal, workplace, and health advice. Workers are made aware of the support available as part of the induction process, our internal wellbeing campaign, regular toolbox talks, posters and during our regular focus group meetings and annual back to work initiative
- We choose to work with the Lighthouse Construction Industry Charity, who provide workers with 24/7 support, should they need it. It is also available to their families as part of an EAP programme.
- Our HR database holds the sensitive information of all workers, therefore we have the ability to raise any discrepancies in the system, replication of details such as mobile telephone

numbers, next of kin details, address and bank details. They are then raised for further investigation.

- Upon a worker leaving, we ask for resignation letters direct from the individual, hold exit interviews and ensure workers fulfil their notice period where appropriate.

### **Compliance and conformity**

Suppliers (including their subsidiaries or subcontractors) are expected to act in accordance with the Company's Code of Conduct, or an equivalent of its relevant core principles in the performance of any agreement.

We administer thorough reviews of our processes and our supplier approval procedure. Our Pre-Qualification Questionnaire is sent out periodically to both suppliers and contractors in order of gravity to Gatwick Construction. We require recipients to confirm that they are acting appropriately so that exploitation and trafficking does not occur directly, or in their supply chain. We also ensure they provide evidence of their Modern Slavery Policies and

Statements as part of the process, remaining diligent and aware of any non-conformities. A tier system is applied to all our suppliers on a significance basis – with the input from all core sectors of Gatwick Construction. Full assessment is carried out on the suppliers prior to approval, and we require suppliers to comply with all relevant laws and regulations. Where appropriate, we also warrant that our suppliers hold certifications from creditable providers

### **High-Risk Areas in Our Business and Supply Chain**

We recognise that modern slavery risks are highest in our construction projects, particularly where there is a reliance on subcontracted and temporary labour. This includes high-risk categories such as services used for operational purposes, where workers may be vulnerable to exploitation due to extended hours or physically demanding work.

### **Key Performance Indicators (KPIs)**

We measure progress in tackling modern slavery through KPIs such as:

- The number of supplier audits conducted.
- The percentage of staff and suppliers completing modern slavery awareness training.
- The number of reported incidents of modern slavery and their resolution rates.
- Supplier compliance rates with our anti-slavery policies.

### **Company Structure and Responsibilities**

Our Modern Slavery Team, comprising members from Recruitment, HR, Operations, Health & Safety, and Compliance, oversees all aspects of modern slavery management. Directors play a crucial role by establishing policies, promoting transparency, and ensuring compliance with relevant laws.

### **Due Diligence and Compliance**

We conduct rigorous due diligence in recruitment and supply chain management, including mandatory identity and right-to-work checks, monitoring of payment practices, and regular reviews of suppliers through our Pre-Qualification Questionnaire.

We expect all suppliers to act in accordance with our Code of Conduct, which includes strict prohibitions against forced labour, child labour, discrimination, and unethical recruitment practices.

### **Support and Reporting Mechanisms**

All workers have access to confidential grievance mechanisms, with support provided by the Lighthouse Construction Industry Charity. We ensure that communication channels are available in multiple languages to accommodate all workers, especially vulnerable groups.

### **Action Plan**

Should any evidence of modern slavery arise, Gatwick Construction Ltd has a comprehensive action plan in place to support victims and address the situation effectively. This includes immediately reporting findings to the appropriate authorities, providing victims with access to medical care, counselling services, and safe accommodation, and ensuring their overall well-being. For perpetrators, we are committed to disrupting their operations by reporting the crime to law enforcement. Our action plan is designed to take the right course of action for both the victim and the perpetrator, ensuring a thorough response to any incidents of modern slavery within our business or supply chain.

**Victim** – Upon sufficient evidence, we will direct the individual toward the correct contact to help, we will report any findings to the police so that they can provide the correct support for the individual. They'll get medical care and help arranging accommodation in a safe place, away from their traffickers. Our charity of choice provides around the clock counselling for both the individual and their family.

**Perpetrator** – If we should find evidence that somebody is participating in trafficking or exploitation of labour workers, we will do our best to disrupt their operation by reporting it as a crime.

**Internal Processes** – In the event of the exploitation of a Gatwick Construction worker, we will address and review our internal policies and procedures to ensure that we couldn't have done anything to help the individual sooner. Just like we do with any other policy, it is important that we review this on a regular basis to make sure we are always doing our best, and continually improving to safeguard our workforce.

Signed:



Tim Toon - Managing Director  
5 February 2024

Gatwick Construction Ltd

Signed:



Nicola Toon - Director  
5 February 2024

Gatwick Construction Ltd

The Directors shall review and update this policy statement whenever necessary and as a minimum will review its contents annually.