CORSERV

**CORSERV LIMITED**
**Modern Slavery and human trafficking statement for the Corserv Group of Companies (financial year 2022/223)**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps that the Corserv Group has taken over the 2022/23 financial year to ensure that slavery and human trafficking are not taking place within the Group or its supply chain. This statement covers the financial period from 1 April 2022 to 31 March 2023.

The Corserv Group

Corserv Limited is wholly owned by Cornwall Council. For the financial year 2022/23, the Corserv Group of Companies included Corserv Limited, Corserv Solutions Limited, Cormac Contracting Limited, Cornwall Housing Limited, Cornwall Airport Limited, Corserv Facilities Limited, and Corserv Care Limited (the "Corserv Group of Companies").

Our purpose is to provide shared back-office functions such as human resources, finance, IT, legal and governance and procurement services to the Group. Our Group of Companies provide services such as highways and infrastructure, social housing, FM services and social care to the residents of Cornwall. Cornwall Council is our shareholder and the profits made by the Group are returned to the Council as a dividend, which can be reinvested into public services. We employ approximately 2,600 people across the Group.

We operate a zero-tolerance approach to modern slavery and human trafficking. We expect all of our Directors, Officers, employees, suppliers, contractors, our supply chain and any other third-party we engage, to adhere to and comply with our zero-tolerance policy.

We understand the importance of ensuring that robust systems are in place to identify and address any risks of modern slavery and/or human trafficking. We have continued to ensure that procedures are in place to identify, and where necessary, address such risks.

Recruitment and Employment

We have employment practices, procedures and diversity policies in place to help ensure the fair recruitment and treatment of employees. Our recruitment policies are designed to ensure that all prospective employees have the right to work in the UK and to safeguard employees from coercion. We are committed to paying fair wages and all staff in the Group are paid the Foundation Living Wage as a minimum. This commitment is shared with our Shareholder, who is an accredited Living Wage employer.

Prior to starting employment with us, we will verify and obtain evidence that a new employee has the right to work in the UK. Where there are additional requirements for employment (for example a Disclosure and Barring Service (DBS) check) then

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further forms of identification will be obtained and verified before employment commences.

Use of agency staff may be arranged through external recruitment agencies. Before any agency staff are engaged, assurance would be required that the individual has the right to work in the UK. Where the relevant employment checks cannot give the level of assurance required to our satisfaction, an individual would not be invited to undertake work in an agency capacity.

We are currently in the process of formalising our contractual relationships with the external recruitment agencies we engage. As part of this review process, we will seek confirmation that our external agencies comply with our policies and the provisions of the Modern Slavery Act 2015. We will continue to review compliance and will ask the recruitment agencies to provide evidence of such compliance, where required.

Corserv also operates its own internal recruitment service both within its Group of Companies and for external businesses (Jobline and Talentide) as well as an external apprentice service. Right to work in the UK is verified as part of standard candidate checks.

Service Delivery

In order to deliver our services, for example social care and residential property maintenance, our staff are often required to visit residents in their homes. Our staff may witness, become aware of or suspect modern slavery, human trafficking, abuse and/or coercion when delivering our services. It is crucial that our staff are able to identify potential occurrences of modern slavery, human trafficking and other safeguarding issues and understand how to report these concerns without delay so that appropriate action can be taken. We have policies in place (such as our Speaking Up policy) as well as an e-learning programme to provide guidance to our staff on how to identify and report these issues.

Procurement and Supply Chains

As a Group we spend approximately £130m annually on the purchase of goods, services and works. We have a diverse supply chain which includes agency staff, professional services, plant and materials, bitumen, software, fleet vehicles, PPE and workwear, office equipment and furniture and cleaning products. As a Group we have implemented a procurement strategy to ensure our business operations are ethical, effective, contribute to the local economy and are sustainable.

We expect our sub-contractors, suppliers and consultants to take appropriate steps to ensure that there is no modern slavery or human trafficking within their businesses or supply chains. We seek approval directly from our suppliers through the tendering process and include a contractual requirement that adequate safeguarding arrangements are in place. We also include a right to terminate in our contracts where a supplier is found to have breached the legislation and our policies on modern slavery and human trafficking. Our standard terms and conditions contain a general

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right of audit, which would allow us to audit a supplier where we suspect non-compliance.

We also seek confirmation that, where a supplier is required to publish their own Modern Slavery statement, they are compliant with the reporting requirements under section 54 of the Modern Slavery Act 2015. Where any issues are identified, we would review our on-going relationship with that supplier.

We operate fair payment practices in our supply chain, endeavouring to settle all valid invoices within 30 days as we understand that failure to pay supply chains can cause disruption which may increase worker vulnerability.

We expect our suppliers to share our commitment to pay their staff a fair wage. We include in our contracts a requirement that our suppliers pay staff providing services to us (on a regular basis) the Foundation Living Wage. As a business with a diverse supply chain, we recognise the challenges of ensuring that our suppliers have implemented this requirement throughout their workforce. Where we have a genuine concern that a supplier is not compliant with the requirement to pay its staff the Foundation Living Wage, we would first seek assurances from the supplier and then consider our ongoing engagement with that supplier where satisfactory assurances are not given.

## Training

We have provided training via our e-learning programme to our staff on how to identify modern slavery and human trafficking issues and how they can report any concerns (via our Speaking Up policy). We are currently reviewing our e-learning programme, and as part of this review, we will implement processes to continue to improve employee engagement.

We have safeguarding advocates in place across the Corserv Group of Companies who have received specialist safeguarding training to help identify any risks which could amount to modern slavery and/or human trafficking.

## Policies

We have implemented a number of policies at Group level which are designed to identify and address modern slavery and human trafficking issues. These policies include Speaking Up (Whistleblowing), Modern Slavery, Anti-bribery, corruption and fraud, Supplier Code of Conduct, Safeguarding and DBS. We are currently implementing a process to ensure that all of our policies are annually reviewed and approved by the Corserv Board.

These policies reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking is not taking place anywhere in our business or supply chains. Our Speaking Up policy provides a mechanism for our employees to report suspected breaches of these policies in confidence.

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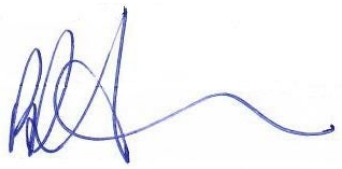
Effectiveness and Review

Modern slavery and human trafficking issues would be identified as part of our annual internal audit programme, the findings of which are overseen and scrutinised by the Group Audit and Risk Committee (ARAC). The detection of any modern slavery issues within the Group of Companies falls into the remit of ARAC's operations. We will continue to review the effectiveness of our internal audit programme and adopt policies and procedures where required.

Further steps

For the financial year 2023/24 and beyond we intend to take further steps to combat modern slavery and human trafficking in our supply chains. These steps include:

- Reviewing and updating our key policies, including Speaking Up (Whistleblowing), Modern Slavery and Safeguarding on an annual basis;
- Updating our procurement policy to reflect our sustainable procurement strategy and to set out our zero-tolerance policy to modern slavery and human trafficking;
- Reviewing our staff e-learning training programme around our key policies;
- Finalise our contractual relationships with the recruitment agencies we use and ensure that these contracts contain terms requiring the agency to comply with our modern slavery policy;
- Undertake a review of existing supplier arrangements, focusing on high-risk areas where the Group receives a regular supply of services, to monitor whether staff of the supplier are being paid the Foundation Living Wage. We will identify several suppliers on a rolling yearly basis and report on compliance to our Audit and Risk Committee; and
- Appointing a member of the Audit and Risk Committee with responsibility to report on ESG issues (including modern slavery and human trafficking) to the Corserv Board.



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Pete Andrew
Chair
For and on behalf of the Board of Directors of Corserv Limited
Approved by the Corserv Board on 2 November 2023