



CARMICHAEL SITE SERVICES LIMITED TRADING AS CARMICHAEL^{UK}

MODERN SLAVERY ACT 2015 STATEMENT MARCH 2024

Introduction

Carmichael Site Services Limited is a company operating in the civil engineering industry, acting as an agency and an employment business. The company trades under the name Carmichael^{UK}. The primary purpose of Carmichael^{UK} is to support construction and civil engineering projects by providing skilled and competent workers to our partner clients.

Carmichael^{UK} is committed to **placing people first** and aims to treat all people with dignity and respect. This is achieved through our core values of honesty, integrity, professionalism, and proactivity. Carmichael^{UK} is committed to working within its own business and supply chains, and across the construction industry to actively confront the challenge presented by the risk of labour exploitation in all its forms.

The Directors are responsible for ensuring that our business and supply chains are ethical, and we are all responsible for ensuring that we act in line with our values and that we follow processes and procedures to prevent modern slavery and human trafficking.

Organisation structure and supply Chains

The structure of the organisation is split across head office staff, directly employed site workers, and agency site workers. Our workers are engaged under various contracts, including umbrella companies, depending on the role that they are required to carry out. We carry out stringent audits across our own workforce as well as the companies that we contract with and to.

Our company has been an Achilles certified Ethical Employer since November 2022 and is audited for its processes and procedures annually. In the November 2023 audit, the auditor noted 4 positive elements one of which was how the company had gone above and beyond. The Board of Directors remains committed to preventing slavery and human trafficking by ensuring that:-

- our company policies around ethical employment are clear, monitored, and enforced
- our processes are rigorous and capable of preventing modern slavery
- our staff and workforce are educated about the potential risk areas in our organisation
- our staff and workforce are educated and aware of the risks in our industry
- our staff and workforce feel confident in how to raise a suspicion of modern slavery
- our modern slavery ambassadors lead a focused campaign to raise awareness of the issues
- our workforce can access Key Information Documentation detailing their pay arrangements
- the risk of modern slavery is included on the board's heat risk map and reviewed monthly

Policies & Governance

We have a group of company policies that are intended to ensure that all people are treated fairly in our business and our supply chain. We are committed to doing things right for the people who work with our company and in our industry. We do this by ensuring that the real risk of modern slavery and human trafficking is mitigated, identified, responded to, and remedied through our policies and procedures. Our policies in connection with managing the risk of modern slavery are continually reviewed and developed and are listed below and are available on our website.

- Anti-bribery and Anti-corruption Policy
- Collaborative Working Policy
- Corporate Social Responsibility & Ethical Conduct Policy
- Ethics & Business Integrity Policy
- Equality, Diversity & Inclusion Policy
- Fatigue Management Policy
- Fraud Policy
- Modern Slavery & Human Trafficking Policy
- Whistleblowing Policy

The company operates a Risk Register which is escalated to the Board within 4 hours of a potential incident and is reviewed at our monthly management meetings.

Assessment and management of risk of modern slavery and human trafficking

There are acute skills shortages within our sector which presents a significant risk of labour exploitation and modern slavery, especially as our industry consists of complex supply chains.

Building on the work we have carried out in previous years, for the year ending 2024, we believe that the biggest risk of modern slavery being present is around our trades and labour operations. This is because the trades and labour workers are not located on the same site as our head office. Accordingly, our focus has been on increasing the delivery of modern slavery information to our entire workforce through face-to-face workshops and sharing information on the subject with our client's workforce. Our labour managers regularly visit our on-site employees and are vigilant for signs of modern slavery.

In addition to delivery of workshops, Carmichael^{UK} continues to operate robust operational processes and procedures within our recruitment, compliance, and payroll operations to manage the risk of modern slavery within our own organisation and within our supply chain. These include the following compliance checks when recruiting and onboarding agency and employed labour:-

- Thorough right to work checks using government certified software
- Thorough reference and qualification checks before employment is offered
- Monitoring of fatigue management to identify potential modern slavery risk
- Two step bank account verifications via our bankers and our compliance department
- Access to whistleblowing processes to enable concerns to be raised
- Checks on our suppliers to ensure compliance with the best practice outlined in our policies

During the year, the company has continued its program of activity aimed at mitigating the risk of modern slavery and human trafficking within its operations and its supply chain. This includes:-

- Ensuring all new head office starters complete the SCSS modern slavery training pathway
- Providing training to our site workforce and collaborating with clients and suppliers
- Ensuring that our Modern Slavery Ambassadors complete additional Stronger2Gether training
- Including reference to modern slavery in all induction materials for employees and workers
- Promoting the Unseen app and associated information to the current workforce
- Continuing our campaign of raising awareness over our social media platforms
- Carrying out toolbox talks on the subject of modern slavery to our onsite workforce
- Promoting our Whistleblowing procedures for office and site-based employees

All employees have access to channels where they can raise concerns, either through local reporting mechanisms or through the global whistleblowing procedure. Carmichael^{UK} is fully committed to protecting employees when disclosing malpractice and will ensure that all disclosures made in good faith are treated confidentially and without fear of retaliation.

Training about awareness and prevention of Modern Slavery and human trafficking

Over the course of the year ending 2024, in addition to the existing practices, Carmichael^{UK} has completed an extensive face-to-face training program to raise awareness across the workforce and our client's workforce. This was initiated in response to the assessment of the highest risk area within our operations. The aim of this program was and is to ensure that workers understand what constitutes modern slavery and what to do if they suspect it. In addition to the modern slavery training, relevant literature and information was supplied to site workers.

We believe that raising awareness is key in tackling this issue, coupled with stringent adherence to the code of conduct that we follow as an ethical employer.

Review of Policy and procedure

Carmichael^{UK} regularly reviews its policies and procedures, at least annually, to ensure employees have access to any additional information and support they may require to collectively assist in managing the risk of human trafficking, forced labour, servitude, and slavery.

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement of Carmichael^{UK} in respect of the financial year ending 31st March 2024.

This statement was approved by the board of Carmichael^{UK} on 22nd March 2024.

Signed for and on behalf of Carmichael Site Services Limited trading as Carmichael^{UK}

 

Rod Carmichael
Managing Director, Carmichael^{UK}