

### CARMICHAEL SITE SERVICES LIMITED TRADING AS CARMICHAEL<sup>UK</sup>

# MODERN SLAVERY ACT 2015 STATEMENT MARCH 2023

#### 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<sup>UK</sup>. The primary purpose of Carmichael<sup>UK</sup> is to support construction and civil engineering projects by providing skilled and competent workers to our partner clients.

Carmichael<sup>UK</sup> is committed to **placing people first** and aims to treat all people with dignity and respect. The company has a zero-tolerance approach in meeting its obligations to prevent slavery and human trafficking and works collaboratively to prevent it within both its business and within its supply chains.

The company approach to modern slavery continues to be to 'find and fix' and our board is committed to drive the company's strategy by ensuring that people are always at the heart of our organisation. This is achieved by working in close partnership with training providers, industry experts, clients, candidates, and suppliers to raise awareness, promote vigilance and recommend best practice around ethical employment. Transparency of our processes and procedures helps the company to identify the situations or circumstances where there may be a potential for being targeted by traffickers and unlicensed gang-masters.

Building on the work we have carried out in previous years, for the year ending 2023, we have focused on the compliance of our Umbrella Companies to ensure that their operations do not constitute any possible risk of modern slavery. Whilst we are not legally permitted from offering recommendations to potential candidates who may wish to work through an Umbrella Company, we are able to confirm which companies have been audited by us for both modern slavery compliance and additional compliance in respect of HMRC.

## Ongoing Management of the risk of modern slavery and human trafficking

Carmichael<sup>uk</sup> continues to operate robust operational processes and procedures within our recruitment, compliance, and payroll operations to combat the risk of modern slavery within our own organisation and within our supply chain. These include:-

- 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

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Additionally, during the course of the year, the company has taken the following steps to manage the risk of modern slavery and human trafficking within its operations and its supply chain:-

- Carried out extra high level training for our appointed Modern Slavery Ambassadors
- Used our Modern Slavery Ambassadors to promote information about modern slavery
- Continued our collaborative partnership with the Supply Chain Sustainability School
- Worked collaboratively with clients in our own upstream supply chain
- Carried out assessments of Umbrella Companies within our downstream supply chain
- Included reference to modern slavery in all induction materials for employees and workers
- Sent the Unseen app and associated information to the current workforce
- Continued our campaign of raising awareness over our social media platforms
- Carried out toolbox talks on the subject of modern slavery to our onsite workforce
- Promoted our Whistleblowing procedures for office and site-based employees

## Raising Concerns about modern slavery and human trafficking

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

The Carmichael<sup>UK</sup> Modern Slavery policy and the Carmichael<sup>UK</sup> Whistleblowing policy are designed to guide best practice and are available on the company's website.

Carmichael<sup>UK</sup> 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<sup>UK</sup> in respect of the financial year ending 31<sup>st</sup> March 2023.

This statement was approved by the board of Carmichael<sup>UK</sup> on 20<sup>th</sup> March 2023.

Signed for and on behalf of Carmichael Site Services Limited trading as Carmichael<sup>UK</sup>

**Rod Carmichael** 

Managing Director, Carmichael<sup>UK</sup>