



BELL CONTRACTING LIMITED

MODERN SLAVERY POLICY STATEMENT

MODERN SLAVERY ACT 2015.

Purpose of this policy

The purpose of this policy is to outline the processes and practices that we have implemented within KW Bell Group and Bell Contracting Ltd, to ensure that modern slavery has no place within our business.

It is the responsibility of all our managerial staff to ensure that they familiarise themselves with this policy and its associated provisions. It is the aim of the policy to convey to our employees, sub-contractors, suppliers, clients and customers our straight forward approach to proactively tackling this issue in the workplace .

What is Modern Slavery?

Slavery	Exercising powers of ownership over a person
Servitude	The obligation to provide services is imposed by the use of coercion
Forced or compulsory labour	Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily

Who is covered by this policy?

This policy applies to all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed term or temporary).

Preventing Modern slavery

As part of this commitment, we will maintain clear policies procedures preventing exploitation and human trafficking and protecting our workforce and reputation.

We will undertake regular risk assessments to identify vulnerable sectors of our business and implement appropriate control measures.

Our procurement department will include clauses in our sub-contractor and supplier contracts that promote our objective of preventing modern slavery.

We will give training and guidance to all senior members of staff, in preventing modern slavery and ensure this policy is understood by all members of staff.

Responsibilities of our staff - identifying and reporting slavery

All staff must ensure that they read, understand, and comply with this policy. It is compulsory upon all members of staff to be vigilant to signs that modern slavery may be present in our business or supply chain.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with other workers if they breach this policy.



Identifying

There is no typical victim and some victims do not understand they have been exploited and are entitled to help and support. However, the following key signs could indicate that someone may be a slavery or trafficking victim:

- the person is not in possession of their own passport, identification, or travel documents.
- the person is acting as though they are being instructed or coached by someone else.
- they allow others to speak for them when spoken to directly.
- they are dropped off and collected from work.
- the person is withdrawn, or they appear frightened.
- the person does not seem to be able to contact friends or family freely.
- the person has limited social interaction or contact with people outside their immediate environment.
- the person's wages being diverted from individuals and paid to a third party using cash or cheque or being paid via the same bank account; wages taken off individuals for accommodation, food or to pay off debt.
- a person's lack of understanding of their basic statutory rights such as entitlement to sick pay, holiday pay and other benefits

Reporting

If an employee witnesses anything that they feel falls under this category, they must inform their line manager immediately and not try to get involved in any such matters on an individual basis.

Johanna Buik as Compliance Officer has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

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