

# HUMAN RESOURCES MODERN SLAVERY STATEMENT 2019/20



This statement has been published in accordance with section 54 UK Modern Slavery Act (2015). It sets out the steps taken by the Carey Group PLC during the financial year ending 31 March 2020 to prevent modern slavery in our business operations and supply chains.

## **Introduction**

The Carey Group PLC (which includes Carey Group PLC and its direct subsidiaries, referred to in this Statement as "Carey Group PLC"), wherever it operates, is committed to conducting business with honesty and integrity; in treating all people with dignity and respect and in complying with applicable laws, regulations and treaties. The Carey Group PLC is committed to protecting and promoting human rights throughout the UK and Ireland. The Carey Group PLC does not tolerate child labour, forced labour (including prison labour), or any use of force or other forms of coercion, fraud, deception, abuse of power or other means to achieve control over another person for exploitation.

We are committed to improving our practices to combat modern slavery and human trafficking.

## **Business Structure**

Carey Group PLC provide specialist construction services, including civil engineering, demolition, asbestos removal, dry lining and house building together with resource recovery services for multiple sectors. We have over 1500 employees and operate throughout the United Kingdom and Ireland, with a joint annual turnover in excess of £500million. Our Head Office is located in Wembley, North West London, and we have regional offices in Central London, Milton Keynes, Glasgow and Dublin.

The organisation comprises 8 business units:

**Careys Civil Engineering (P.J. Carey (Contractors) Ltd)** – working as both a subcontractor and on Design & Build contracts undertaking the construction of basements, substructures and superstructures, carrying out enabling and infrastructure works and hard and soft landscaping.

**Careys Building & Civil Engineering (P.J. Carey (Contractors) Ltd Ireland)** - specialise in the delivery of civil engineering contracts throughout a range of sectors; Infrastructure and Renewable Energy, Residential (both Private and Public sector), Commercial, Retail and Industrial.

**ION Environmental (ION Environmental Solutions Ltd)** - a full-service, licensed asbestos removal contractor providing small and rapid response works for residential and commercial developments.

**Scudder Demolition (T.E Scudder Ltd)** – a specialist contractor delivering complex demolition, deconstruction and civils enabling works across a range of sectors.

**BDL Dry Lining (BDL Group plc)** – specialising in commercial and residential dry wall systems, plastering, facades and rendering, and restroom fit out.

**Careys New Homes Ltd** - building quality, affordable homes across the South of England.

**Seneca Resource Recovery (Seneca Environmental Solutions Ltd)** - a leading UK Refuse Derived Fuel manufacturer and exporter, providing a complete range of waste services to the Carey Group and local market.

**Careys Plant & Fleet (P.J. Carey Plant Hire (Oval) Ltd)** – provides plant & vehicle hire to the Carey Group, supply chain plant hire, servicing, site repairs, formwork supply and HGV deliveries.

To find out more about the nature of our business, please visit our website at [www.careysplc.co.uk](http://www.careysplc.co.uk).

## **Our Supply Chains**

Our supply chains include the following:

- Subcontractors;
- Recruitment/labour agencies;
- Suppliers of goods, services and materials

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## Related Policies

We have in place several policies which contribute to our aim of combatting modern slavery and human trafficking, all of which are available to employees via our Company Intranet:

- Whistleblowing; encourages reporting of any concerns relating to our direct activities or supply chains and ensures ease of making disclosures without fear of retaliation.
- Ethical Code of Conduct; sets out the standard of ethics that our suppliers are required to meet, including safe working conditions and treating workers with dignity and respect.
- Anti-Bribery & Corruption; demonstrates our commitment to preventing and prohibiting bribery and corruption in all areas of the organisation, including our supply chain.
- Corporate Social Responsibility; reiterates our ethical code of conduct in relation to suppliers and outlines our commitment to operating in a socially and environmentally responsible way.
- Equal Opportunities; sets out our approach to equal opportunities and the avoidance of discrimination in all our working practices.
- Working Time Guidelines; ensures our workers are not subjected to excessive working hours, overtime/night shift working is optional and encourages work/life balance

## Due Diligence Processes

We have in place systems to:

- Mitigate the risk of slavery and human trafficking occurring in our supply chains:
  - We are an active member of Constructionline and only utilise suppliers of services who are members. This ensures we are using verified suppliers who meet recognised standards.
  - All suppliers must have appropriate policies and standards in place before we engage with them.
  - Where materials are sourced from high risk countries, our supply chain is intentionally limited to suppliers well known to the organisation, who have demonstrated they meet our standards.
- Protect whistle-blowers – our Whistleblowing Policy provides a mechanism for both those who work in and with the organisation to raise concerns.
- Share knowledge and improve understanding amongst our workforce. Through upskilling workshops and internal communications, we share signs to look out for and the mechanism for reporting suspected instances of modern slavery.

## Supplier Adherence to our Values and Ethics

To ensure all those in our supply chain and contractors comply with our values, we expect our suppliers to have a natural respect for our ethical standards in the context of their own culture. We specifically expect our suppliers to extend the same principle of fair and honest dealings to all others with whom they do business, including employees, sub-contractors and other third parties as set out in our Ethical Code of Conduct and Anti-Bribery & Corruption Policies.

All of our suppliers of goods, services and materials must sign up to our Terms & Conditions of Order before we engage with them, which includes their agreement to the above statement.

We are a member of SEDEX, the Supplier Ethical Data Exchange, to ensure our products and materials are produced in conditions which are legal, safe, and without impact to the environment. SEDEX are dedicated to driving improvements in responsible business practices and transparency in supply chains.

We have several departments who work together to promote consistency in our approach; Human Resources, Procurement, Health & Safety and Learning & Development.

## Our Effectiveness

We use the following KPIs to measure how effective we have been at ensuring slavery and human trafficking is not taking place in any part of our business or supply chains:

- Ensuring all employees involved directly with supply chains receive training on modern slavery awareness
- Undertaking a review of our Whistleblowing policy to include specific support and guidance relating to modern slavery and human trafficking
- Continuing to rigorously check right to work documentation. Fraudulent documents can be an indication of modern slavery, we provide upskilling workshops for our site teams and labour providers to ensure the risk of modern slavery is reduced. As of the end of this financial year, 31% of our labour agencies and 40% of our construction sites have taken part in these workshops.
- Developing new systems to verify suppliers of materials, in collaboration with Achilles and Constructionline

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## Training

We are developing a tiered training programme to educate our workforce on the importance of tackling modern slavery and how to ensure prevention within our organisation or supply chains. This will be aimed at employees in our core Support Service functions who interact with our supply chains, as well as our Leadership team and Site Management.

The training will include (but is not limited to):

- How to carry out effective due diligence when engaging with a new supplier
- The signs to look out for that indicate someone may be a victim of modern slavery
- How to report suspected instances of modern slavery, be that in our business or within our supply chain

During the year we have:

- Conducted a Toolbox talk specifically on the issues around Modern Slavery
- Created multi-language posters to highlight and detect incidents of Modern Slavery
- We've shared the internal training material with external parties upon request
- We joined the Stronger Together's, a charity working on Modern Slavery, construction Steering Committee
- We've updated the Agency agreements to include more audit rights and reporting requirements with a view to updating all agreements in the coming year.
- We've engaged an external social auditing company to 3<sup>rd</sup> party audit an established agency with a view to transferring auditing skills into the company
- We've signed up to the GLAA's Construction Protocol and participated and presented at GLAA events.
- We've used collateral from the Supply Chain Sustainability School

We are also reviewing our on-site induction programme for all new workers to raise awareness of modern slavery, including key signs to look out for and the process for reporting it.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 2020. This statement is valid until end of March 2021.

This Policy applies to all companies under the Carey Group as specified below: -

- P.J. Carey (Contractors) Ltd
- P.J. Carey (Contractors) Ltd Ireland
- P.J. Carey Plant Hire (Oval) Ltd
- BDL Group Plc
- T.E. Scudder Ltd
- ION Environmental Solutions Ltd
- Seneca Environmental Solutions Ltd
- Careys New Homes Ltd
- Careys Design Team

Signed on behalf of Carey Group PLC:

Signed:  \_\_\_\_\_ Date: 10 March 2020  
Mr. Jason Carey, Joint Group CEO

Signed:  \_\_\_\_\_ Date: 10 March 2020  
Mr. Tommy Carey, Joint Group CEO

