



Modern Slavery Policy & Young Workers Procedure.

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Contents

1	International Labour Organisation.....	3
2	Commitment.....	3
3	Recruitment and Selection.....	4
4	Monitoring	5
5	Young Worker Process	6
6	Approval, Retention and Issue Details.....	7

Title: **Modern Slavery Policy & Young Workers Procedure**

1 International Labour Organisation

We abide by the four core labour standards as enshrined within the International Labour Organisations (ILO) Conventions:

- **Freedom from forced labour**
(Enshrined in Convention 29 on Forced Labour (1930) and Convention 105 on the Abolition of Forced Labour (1957)).
- **Freedom from child labour**
(Enshrined in Convention 138 on Minimum Age for Entry into Employment (1973) and Convention 182 on the Worst Forms of Child Labour (1999)).
- **Freedom from discrimination at work**
(Enshrined in Convention 100 on Equal Remuneration (1951) and Convention 111 on Discrimination in Employment and Occupation (1958)).
- **Freedom to form and join a union, and to bargain collectively**
(Enshrined in Convention 87 on Freedom of Association and Protection of the Right to Organise (1948) and Convention 98 on the Right to Organise and Collective Bargaining (1949)).

2 Commitment

We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation, within our operations or in any of our supply chains. We expect that our suppliers will hold their own suppliers to the same high standards.

We prohibit the use of forced labour, bonded labour, prison labour and child labour within our company or those that supply to or sub-contract for us. This includes procuring commercial sex acts during the length of the contract, slavery and abduction, misuse of public and prison works, forced recruitment, debt bondage and domestic workers under forced labour situations, child labour and internal or international trafficking. Workers and those closely associated with them will not be subject to harsh or inhumane treatment, physical punishment, psychological or sexual violence, coercion, abuse, harassment or intimidation.

Wordsworth Excavations expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- We have zero tolerance approach to modern slavery in our organisation and supply chains
- The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.
- We take a risk-based approach to our contracting processes and keep them under review. .
- As part of our ongoing risk assessment and due diligence processes, we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our Code of Conduct.
- If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated whether that might represent the best outcome for those individuals impacted by the breach, to terminating such relationships.

Title: Modern Slavery Policy & Young Workers Procedure

3 Recruitment and Selection

General Recruitment

We ensure the following:

- All staff are legally able to work in the UK and are therefore protected by employment legislation. This includes checking right to work documentation, passports and visas (where appropriate).
- All staff have a written contract of employment.
- We provide information to all new employees on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.
- The right to a reasonable wage.
- The right to a safe working environment.

We ensure that all of our employees work voluntarily for us and are not intimidated, threatened, mentally or physically coerced to enforce employment or to work. Also that they retain their rights and privileges.

Concise records are processed, collated and retained for employees, in accordance with the Data Protection Act and General Data Protection Regulations to satisfy compliance to employment acts and regulations, policy and directives.

Each worker has a work contract. This is a written document in easy to understand format and language understood by employees, clearly defining the terms of engagement / employment for each worker and setting out their rights and obligations. Wages, overtime pay, payment periods, working hours, rest breaks, holidays, period of notice for terminating employment will be in accordance with applicable laws, any collective agreements and meet industry standards. Workers can cancel their work contracts at any time with no financial penalty, subject to giving reasonable notice in accordance with above.

An appraisal system ensures that the employee is fairly treated and has 'a voice' to represent themselves and to notify of any contravention with the directives of this policy. A grievance policy and process is also in place. It will not be detrimental for anyone to file a grievance and no retaliation or victimisation will be tolerated for those raising one.

Where there is a benefit to the company to employ a young worker (through an apprenticeship), we ensure that we uphold relevant statutory requirements, that they continue to have access to further education (apprenticeships) to improve their qualification and skills and that they will not work in any hazardous environment, above the legally acceptable weekly hours and not at weekends or at night. The process that follows this policy explains how we ensure that we enforce this.

Receipt and review of official documented evidence of right to work in the UK for all employees prior to employment and an additional date of birth check (i.e. Passport, Birth Certificate, National Identity Card or Driving Licence) is a pre-requisite for young workers / Juveniles and also to confirm the right to work in the UK. We will not withhold or confiscate any official document, property or identity to prevent or restrict any employee's free movement nor create workplace slavery. Likewise, we will not charge workers any fees or costs associated with recruitment nor require them to make payments, security payments or repayment of debt through work, either directly or indirectly, which can have the effect of creating workplace slavery.

Where it is determined, following employment, that a the Young Labourer or Juvenile is actually child labour, we will endeavour to resolve the issue amicably with the parent / guardian's involvement which may include agreed financial assistance and subject to vacancy, will always include re-employment at the minimum working age should the child want it .

Title: Modern Slavery Policy & Young Workers Procedure**Agency Labour**

- The company follows firm policy and only uses agreed specified reputable recruitment agencies.
- We expect all recruitment agencies with whom we engage:
 - To fully comply with the Modern Anti-Slavery Act 2015
 - Are free from ethical ambiguities
 - Are transparent, accountable and auditable
- If the company has reason to believe that any recruitment agency has failed to meet these standards, any contracts with them would be terminated.
- We keep agencies on the list under regular reviews.

4 Monitoring

Managers who are responsible for employee recruitment and monitoring procedures associated with forced labour, bonded labour, prison labour and child labour or supplier chain implementation and evaluation are given awareness, guidance and instruction to ensure that they understand the law, the processes and can effectively administer its directives.

We have procedures in place to ensure that we maintain this policy and ensure that our suppliers and Partners do likewise. Reviews and where necessary subsequent meetings are held by the managers who have been designated responsible persons, to ensure that we are monitoring this policy and associated procedures and to discuss any issues or complaints relevant to them.

Workers employed via a third party will be reputable and hold the necessary licences, registrations and insurances. They will be expected to adhere to our principles for compliance to the Modern Slavery Act. Suppliers who do not uphold the code are removed from our approved suppliers list as part of our BS EN ISO9001 standard.

This policy applies to all persons working for us or on behalf in any capacity, including employees at all levels, directors, subcontractors, agency workers, contractors and suppliers.

Signed For & On behalf of Wordsworth Excavations Ltd

Date: 29/09/23



Thomas Wordsworth
Managing Director

Title: Modern Slavery Policy & Young Workers Procedure

5 Young Worker Process

Please note, recruitment, employment and probation is covered in organisational knowledge, competence, training and awareness

Note 1 –

Child labour is defined as the recruitment, hiring and employment of workers under the minimum working age or the age of 15, whichever is higher.

Young labour is defined as the employment of workers of at least the minimum working age but younger than 18.

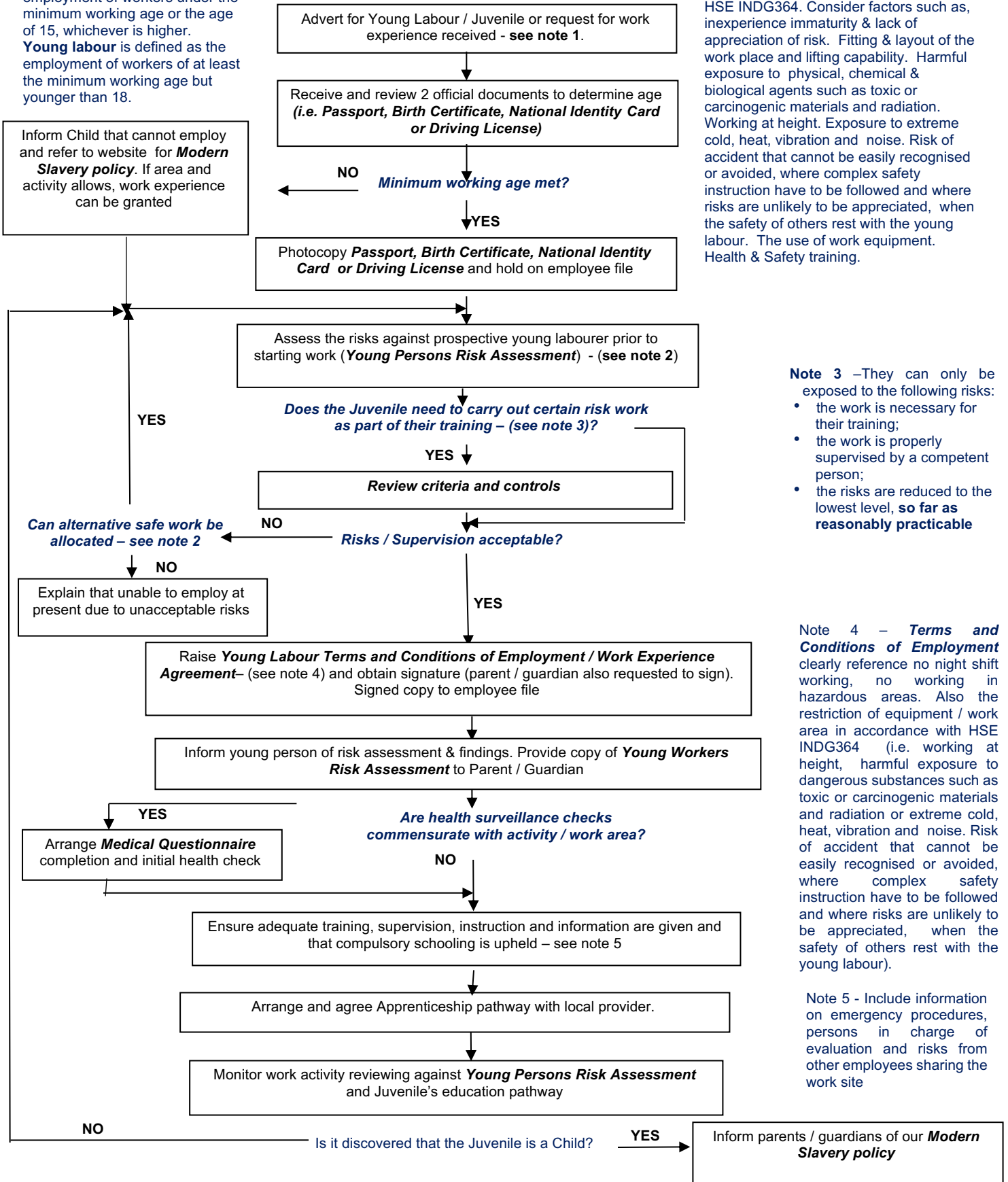
Note 2 - Young labour is restricted to equipment / work area in accordance with HSE INDG364. Consider factors such as, inexperience immaturity & lack of appreciation of risk. Fitting & layout of the work place and lifting capability. Harmful exposure to physical, chemical & biological agents such as toxic or carcinogenic materials and radiation. Working at height. Exposure to extreme cold, heat, vibration and noise. Risk of accident that cannot be easily recognised or avoided, where complex safety instruction have to be followed and where risks are unlikely to be appreciated, when the safety of others rest with the young labour. The use of work equipment. Health & Safety training.

Note 3 –They can only be exposed to the following risks:

- the work is necessary for their training;
- the work is properly supervised by a competent person;
- the risks are reduced to the lowest level, **so far as reasonably practicable**

Note 4 – **Terms and Conditions of Employment** clearly reference no night shift working, no working in hazardous areas. Also the restriction of equipment / work area in accordance with HSE INDG364 (i.e. working at height, harmful exposure to dangerous substances such as toxic or carcinogenic materials and radiation or extreme cold, heat, vibration and noise. Risk of accident that cannot be easily recognised or avoided, where complex safety instruction have to be followed and where risks are unlikely to be appreciated, when the safety of others rest with the young labour).

Note 5 - Include information on emergency procedures, persons in charge of evaluation and risks from other employees sharing the work site



Title: Modern Slavery Policy & Young Workers Procedure

6 Approval, Retention and Issue Details

Document available as read only from the following location:

BUSINESS MANAGEMENT SYSTEM

Review Frequency:

Every 3 years unless statutory, audit, incident or non-compliance require otherwise.

Retention: Controlled printed copies destroyed when superseded. Electronic copy held for 5 years unless statutory required or contractually requested to hold beyond this period.

Issue	Details	Author	Approval	Date
1	Initial Issue	P Gordon	TW/KGJ	29.09.2023