



Modern Slavery Policy

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8th January 2024

MODERN SLAVERY ACT 2015 & IMMIGRATION, ASYLUM & NATIONALITY ACT 2006 POLICY STATEMENT

NORTHERN STEEPLEJACKS (EDINBURGH) LTD

Northern Steeplejacks Edinburgh Ltd recognises that slavery and human trafficking remains a hidden blight on our global society. The aim of the Company is to identify our responsibility by alerting staff to the risks, however small, in our business and in the wider supply chain. Staff are expected and encouraged to report concerns to management, where they are expected to act upon them.

Company activities are varied through multiple disciplined areas and sectors such as: Works and inspections of industrial structures on behalf of Public and private clients, places of worship and structures of national importance, and likewise we have a multi-disciplined supply chain to support us through the different aspects and provisions of our business.

We are committed to ensuring that there is no modern-day slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy Statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

This Policy takes into account, and supports, the policies, procedures and requirements documented in our Integrated Management System, compliant with the requirements of ISO 9001:2015, ISO 14001:2015 and OHSAS 18001:2007.

The implementation and operation of this management system underlines our commitment to this policy statement. Formal procedures concerning slavery and human trafficking have been established, including disciplinary procedures where they are breached. Additional procedures ensure that this policy is understood and communicated to all levels of the company, and that it is regularly reviewed by the Directors to ensure its continuing suitability and relevance to the company activities

The Company will achieve these aims by our initiative to identify and mitigate risk in the following ways (But not limited to):

- *More stringent vetting and investigation of our supply chain (contractors, sub-contractors, policies, contracts etc.).*
- *Continually audit & review our practices for checking all employees are paid at least the minimum wage and have the right to work;*
- *We encourage the reporting of concerns and the protection of whistle blowers.*
- *The company will not knowingly support or deal with any business involved in slavery or human trafficking.*
- *We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors comply with our values. In order to ensure that our supply chain complies with all aspects of the Modern Slavery Act 2015 and the Immigration, Asylum & Nationality Act 2006 (section 15 – 25) we will obtain a copy of their company policy and procedures. These suppliers will also have to confirm in writing that they fully comply with all aspects of checking their employees or prospective employees right to work in the UK and the types of work these persons are allowed to undertake using the UK government online checker portal, and also physical documentation that they will be in possession of – All suppliers must be able to prove that their systems, policies and procedures have been updated in line with current guidance that no person from the EU, EEA and Swiss Citizens from 1st July 2021 is entitled to work in the UK using their Passport/National Identity card only.*
- *Where, Northern Steeplejacks Edinburgh Ltd as a company employs the services of an Agency for operatives or staffing levels, they will also be required to ensure and provide proof that they fully comply with all aspects of checking their employees or prospective employees right to work in the UK and the types of work these persons are allowed to undertake using the UK government online checker portal, and also physical documentation that they will be in possession of – All suppliers*

must be able to prove that their systems, policies and procedures have been updated in line with current guidance that no person from the EU, EEA and Swiss Citizens from 1st July 2021 is entitled to work in the UK using their Passport/National Identity card only.

Procedures that Northern Steeplejack Edinburgh Ltd will adopt to ensure compliance with all aspects of the Modern Slavery Act 2015 and the Immigration, Asylum & Nationality Act 2006 (section 15 – 25) are as follows:

We will obtain physical copies of all List A Documents which show that a person has an indefinite right to work in the UK. These may be either of the following documents:

UK issue passport showing the holder is a British Citizen, or a Citizen of the UK and colonies which have the right of abode in the UK – This will be shown as a passport with a specific information sticker in it detailing if the holder has right of abode.

Any person from the EU/EEA/Swiss countries has updated their status using the government sites to allow permanent residence in the UK and that they have obtained the relevant documentation and right to work documentation and share codes.

Any person who has temporary rights to work in the UK under a visa scheme will be required to produce certified copies of Relevant Government/Border issue permits/Visas including verification codes and original country of origin issue Passports.

We will not under any circumstances accept as form of right of eligibility to Reside/Work in the UK any of the following documents:

- Home Office Standard Acknowledgement Letter or Immigration Service Letter (IS96W) which states that an asylum seeker can work in the UK.*
- A National Insurance number on its own in any format*
- A driving licence issued by the Driver and Vehicle Licensing Agency*
- A bill issued by a financial institution or a utility company*
- A passport describing the holder as a British Dependent Territories Citizen which states that the holder has a connection with Gibraltar*
- A short (abbreviated) birth certificate issued in the UK which does not have details of at least one of the holder's parents*
- A licence provided by the Security Industry Authority*
- A document check by the Criminal Records Bureau*
- A card or certificate issued by the Inland Revenue under the Construction Industry Scheme.*

These above procedures are in place for all Current employees where applicable, and future employees from the date of the relevant legislation changes.

Northern Steeplejacks Edinburgh Ltd will retain copies of all documentation and verifications supplied for our own employees and also supplier records pertaining to employees eligibility for a period of 2 years from the date of receipt. These will then be destroyed in accordance with all GDPR requirements and recommendations.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff. All Directors have been briefed on the subject.

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

*Completion of Audits by Directors, Managers Safety managers and Safety Advisors;
Use of labour monitoring and payroll systems; and Level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations.*

This policy is in accordance with Section 54 of the Modern Slavery Act 2015 and the Immigration, Asylum & Nationality Act 2006 and constitutes our company's slavery and human trafficking statement.

For and on behalf of *Northern Steeplejacks (Edinburgh) Ltd*:



Signed:.....

Date: 8th January 2024

Lee Noon – Director