

# 39. Modern Slavery and Human Trafficking Policy

## INTRODUCTION

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This statement sets out Architectural Decorators' commitment to preventing slavery and human trafficking in all our business activities and within our supply chains. It outlines the steps we have taken to ensure compliance with the Modern Slavery Act 2015 (MSA) and minimise the risks of exposure to any practices or activities which undermine the safety and dignity for our customers, our employees, and anybody employed within our supply chain.

Architectural Decorators Ltd (trading as AD Construction Group) delivers building refurbishment and maintenance works for public and private sector clients. Established in 1944, we have over 70 years' experience of working within Social Housing environments and operate in some of the most challenging/deprived neighbourhoods in the country. Our company provides high quality service support to thousands of homes with diverse needs.

The Company operates from our Head Office located in Sidcup, South East London, and predominately delivers services from sites across the South East of England.

Our supply chain consists of material and plant suppliers and trade subcontractors.

Architectural Decorators has a zero-tolerance stance on Modern Slavery and Human Trafficking and is committed to ensuring that its business dealings are carried out in compliance with all relevant laws. To achieve this, we actively promote and implement ethical business practices to prevent the abuse and/or exploitation of workers.

### **Our Commitment to our Employees**

Basic rights we expect all workers to enjoy, including:

- a) The right to a reasonable wage
- b) The right to a safe working environment
- c) The right to an appropriate level of holiday and sick pay
- d) The freedom to complain directly via our whistleblowing policy if they believe that they are not being fairly treated or suspect that someone is being exploited.

Architectural Decorators pays its employees a fair wage for their labours. We insist that all people who work on our behalf are recompensed accordingly for their efforts and regularly review salary levels to ensure that we offer a fair wage for work undertaken. In addition, we encourage our Supply Chain partners to pay their employees a reasonable wage and have begun to audit our subcontractors and suppliers on an annual basis to verify that their staff are receiving a fair wage.

### **Child Labour**

Architectural Decorators do not employ anyone that could be considered a child worker. While we may offer work experience placements and apprenticeships to young and/or inexperienced workers, they are subject to the same rights and protections that we provide to all workers.

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## Organisation Structure

The Board of Directors has overall responsibility for ensuring that our policies fulfil our legal and ethical obligations, and that all those under our control (either as directly employed staff and operatives, or as employees of our supply chain) comply with them.

The Procurement Manager has day-to-day responsibility for implementing this policy, monitoring its effectiveness, and auditing Architectural Decorators' internal control systems and procedures to ensure that they are (and continue to be) effective in combating modern slavery.

Line managers in all departments are responsible for ensuring that those reporting to them understand and comply with this policy and are given adequate and regular training on it.

All employees, both those directly employed by Architectural Decorators and those under our control who are employed by our suppliers, are invited to comment on our policy and suggest methods by which it could be improved. Any employee who breaches Architectural Decorators' policies faces disciplinary action, which can result in dismissal for misconduct or gross misconduct.

## Supply Chain Management

We expect the same high standards from our suppliers, trade subcontractors, and other business partners. As part of our procurement processes, we specifically prohibit the use of forced, compulsory or trafficked labour and we expect our suppliers to hold their own supply chain to the same high standards.

Any supplier or trade subcontractor that wishes to work with/for Architectural Decorators is subject to a rigorous, PAS91 compliant assessment process prior to being added to our Approved Supplier List. This process is designed to ensure that all companies within our supply chain meet our specific criteria and hold values that are compatible with our own.

Use of the PAS91 process requires our supply chain to demonstrate that steps have been taken to ensure that slavery and human trafficking is not taking place in any part of their business. Failure to produce evidence on request of any such efforts can result in exclusion from our Approved Supplier List until such evidence can be provided.

To ensure that the companies who supply us with plant and materials are not exploiting staff, we only work with companies that have been audited by external bodies and accredited (e.g. Constructionline, ISO:900, ISO:14001; OHSAS:18001) as having robust management systems in place to enable them to comply with the Modern Slavery Act 2015.

Our zero-tolerance approach to modern slavery is communicated to all suppliers and contractors at the start of our working relationships, and regularly re-iterated and reinforced. We will end any working relationship with individuals or organisations working on our behalf should they be in breach of our policies.

## Temporary Labour

Modern slavery presents itself in a number of forms including bonded labour (where workers are forced to work to pay off a debt), poor wages, working and living conditions, intimidation and violence, and human trafficking. Migrant workers within the construction industry are particularly vulnerable to this crime, with rogue recruitment agencies willing to exploit migrant workers to meet the global demand for low waged staff.

Where we occasionally have the need to supplement our own labour force with temporary agency staff, we vet agencies and conduct background checks on them to ensure that their staff are not being

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forced to pay exploitative “recruitment fees.” We also check documents of all workers, both directly employed by us or as temporary labourers, to verify that they have the right to work in the UK legally and are therefore protected by employment legislation. This includes checking right-to-work documents, visas and passports.

### **Training**

Training on this policy forms part of the induction process for all individuals who work for us, and regular training is provided as necessary. Safeguarding Training is provided to all our employees who will encounter members of the public and operatives from other organisations, and Architectural Decorators emphasises the need for staff to report their concerns should they suspect that someone is being exploited.

### **Whistleblowing Policy**

We encourage all employees to report any concerns relating to unlawful or unethical conduct, dangers to the public or the environment, and any other matter of a serious nature including Modern Slavery.



Signed  
Chairman & CEO

Date: 01/03/2023

Date of Review: 01/03/24