MODERN SLAVERY POLICY STATEMENT - 04

The following Anti-slavery policy states our intentions and commitment to improve our practices in line with the Modern Slavery Act 2015.

Organisation
Logan Construction (South East) Ltd is a principal contractor specialising in all areas of refurbishment and new build projects, predominately within the education, healthcare and commercial sectors. From our offices in London and Kent, we manage projects for public and private sector clients throughout London and the South East. We work in the UK only.

Introduction
The Modern Slavery Act of 2015 requires certain businesses to provide disclosure concerning their efforts, if any, to address the issues of slavery and human trafficking in their supply chains. We are committed to maintaining and improving systems and processes to avoid complicity in human rights violations related to our own operations and that of our supply chain. We do not tolerate modern slavery or human trafficking in our organisation or in our supply chain.

Company policies
We have policies in place prohibiting harassment, discrimination and victimisation and these explain how our employees can identify any instances, where they can go for help and guidance, and what the next steps will be. Our whistleblowing policy explains how staff can raise legitimate concerns.

All our staff have access to these policies.

Due diligence processes for slavery and human trafficking
Our initiatives to identify and mitigate the risk of human slavery and human trafficking in our business include:

- Our recruitment processes are transparent and reviewed regularly. We communicate directly with candidates to discuss job opportunities and to confirm the details of any offer made. We have robust procedures in place for the vetting of new employees and ensure that we can confirm their identities and that they are paid directly into an appropriate personal bank account.
- We require our supply chain to complete a robust pre-qualification questionnaire approval process that requires them to take steps to eliminate slavery in their own business and supply chain.
- We are committed to providing modern slavery training for our staff to highlight the issues around modern slavery.
- We provide notices on all sites that highlight the issues around modern slavery, giving routes to confidentially report potential or suspected cases.
- We encourage anyone (including employees, sub-contractors, suppliers, and clients) to report in good faith (confidentially if they so wish) any issues or concerns about potential ethics, human rights, legal or regulatory violations including improper or unethical business practices such as fraud or bribery.

Effectiveness of our due diligence processes
Our audit procedures and operational teams ensure these processes work effectively and will monitor them regularly, adapting as necessary to the changing needs of our business. There have been no reported cases of modern slavery with the business.

Supplier adherence to our values and ethics
We have committed ourselves to developing long term relationships with our sub-contractors and suppliers. We pride ourselves with our ‘Pay on Time’ policy, one of the cornerstones of our success

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in building those long-term relationships. We will work with our suppliers and clients to ensure that we all ensure that the requirements of the Modern Slavery Act are complied with.

When required, we use the services of recruitment agencies. The agencies we use are reputable and we expect them to have the same standards in terms of ethics and legal compliance, including their own policies on modern slavery and human trafficking.

Training

To ensure a prominent level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we will provide training to our staff. Training is given to all staff to highlight the risks in our business and to show the appropriate steps to take should any staff become suspicious of modern slavery taking place. We ensure that suitable and sufficient training is given to Directors, Managers, Supervisors and Operatives and that refresher training is given every 24 months, unless a fundamental change of legislation occurs.

Responsibilities

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. It is the responsibility of the HR Manager to ensure that all Foreign Nationals that are engaged by the business are within the UK legally and they have a legal right to work.

Reporting

It is the requirement of all those working for us or on our behalf report any non-compliance with the Modern Slavery Act 2015 to their Line Manager. It is also the requirement of the Line Manager to inform the Police if they believe that a crime has been committed in relation to the Modern Slavery Act 2015.

Provisions

The Directors and Staff of Logan Construction are aware of their responsibilities to eradicate Modern Slavery. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.

Should any employees be found to be participating or tolerating this practice they will be subject to disciplinary proceedings up to and including dismissal. If any suppliers (including contractors or sub-contractors) are found to be participating in these unlawful practices their contract with Logan Construction will be terminated.

We are committed to:

- ensuring that all our business operations are free from involvement with slavery or human trafficking,
- operating systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation. We expect our suppliers to hold their own suppliers to the same exacting standards,
- carrying our regular audits to ensure that all our employees are paid at least the National Minimum Wage and have the right to work in the UK,
- conducting research to identify any parts of our business where there is a risk of slavery or human trafficking taking place and following agreed steps to assess and manage the risk,
- assessing the effectiveness of the measures that we have taken to stop slavery and human trafficking taking place, including the way that we assess and manage any risks that are identified,
- ensuring that slavery and human trafficking is considered and addressed in our approach to corporate social responsibility,

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- ensuring that any concerns about slavery or human trafficking can be raised through our whistle-blowing procedure,
- appointing a named individual to oversee the compliance with the Modern Slavery Act 2015,
- providing training for all relevant employees.

Risks and monitoring
Working in the UK, the main risk of incidents within our business lies with our sub-contractors and suppliers of labour, with particular risk from overseas providers of materials. With regards to our supply chain, Logan Construction operates a preferred supplier system whereby we ensure suppliers are aware of the issues surrounding modern slavery, how to eradicate it, and do not knowingly or unknowingly take part in this practice.

Service Level Agreement (SLA)
A SLA is in place with our suppliers, as part of our terms and conditions, which obliges them to comply with the Modern Slavery Act 2015, amongst other regulations.

Key performance indicators (KPIs)
We have introduced the following KPIs in response to the introduction of the Modern Slavery Act 2015. The indicators and activities are reviewed at least annually.

- 100% of our suppliers to have agreed to the supplier terms and conditions which include our SLA for Modern Slavery.
- 100% of all existing and new employees complete the compulsory Modern Slavery training.
- 100% of all sub-contractors complete Tool Box Talks on Modern Slavery during site inductions.
- 100% of employees who have roles dealing with suppliers, such as the Procurement Team receive ongoing updates and notifications regarding business & human rights, and specifically Modern Slavery.

Additional steps
We comply with the Gangmasters and Labour Abuse Authority Construction Protocol and CIOB Building a Fairer System. We implement:

- Completion of the CCS Modern Slavery Assessment Tool
- DBS checks for onsite staff (direct and subcontracted)
- Sustainable Procurement, Whistleblowing Policy, Recruitment and Right to Work Policies
- Mandatory iHASCO training for employees
- Companywide SharePoint with relevant polices and links to further support
- Approved Supplier List Code of Conduct with human rights obligations
- Information sharing and workshops with ASL for compliance
- Sign-in/out process on sites to enhance accurate records of individuals on site
- Ad hoc onsite audits to ensure obligations compliance

Conclusion
The HR & Compliance Manager, has been appointed by Logan Construction with the responsibility and authority to oversee and drive our Modern Slavery Policy.
There have been no reported cases to date of modern slavery with the business.
This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 30/06/2022 and has been produced within 6 months of this date. For the sake of transparency, this statement is published on our Company website.

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William Logan
Managing Director
Date: 03rd January 2025