

Anti-slavery and Human Trafficking Policy

17 January 2018

Last reviewed: 15 November 2024



Policy statement

Pellikaan Construction Ltd (Pellikaan) is a successful family-owned construction company. We are a well-established business and form the UK part of the Pellikaan Group, which trades and has offices in The Netherlands, the UK, Belgium and Germany. In the UK, we focus on the design and build construction of leisure centres and schools for clients throughout the UK.

Our business model is one of construction project management, and we harness tried and trusted subcontractors and suppliers in the delivery of our business wherever possible.

We are committed to applying the highest level of ethical standards and governance and operate our business transparently, accountably and with integrity at all times.

Integrated within our business model, Pellikaan has a zero-tolerance approach to slavery and human trafficking, which are a criminal offence under the Modern Slavery Act 2015. This policy therefore applies within our company and in our supply chain – to any individual who works for us, whether directly employed or working for us in our supply chain, and at whatever level.

Types of modern slavery

We recognise that modern slavery can occur in various forms – these include servitude, slavery, forced, bonded or compulsory labour and human trafficking. The common strand is deprivation of a person's civil liberty by another person, who is exploiting them for personal or commercial gain. We aim to ensure that no-one becomes a victim of this crime.

Compliance

We will comply with the Modern Slavery Act 2015 by:

- Informing customers, employees, suppliers and other stakeholders of our policy approach to modern slavery, human trafficking, forced, compulsory and bonded labour and labour rights violations in our supply chain.
- Taking prompt action where a compliance breach or potential breach has been identified or flagged, in order to ensure the fundamental rights and freedoms of people are respected. This will involve communication with the Authorities as necessary.
- Not knowingly supporting or dealing with any business or individual involved in slavery or human trafficking.
- Setting clear expectations of our supply chain, and managing it effectively.
- Carrying out regular due diligence in the form of risk analysis and mitigation.
- Thorough application of our Anti-slavery and Human Trafficking Policy – as set out below.

Policy Application and Actions

Our employees and wider people under our control have an obligation to understand and apply this policy – to help in the identification and prevention of modern slavery. They must avoid any activity that might lead to, or suggest, a breach of this policy.

For the purpose of clarification, “wider people under our control” may include agency workers, seconded workers, volunteers, trainees, agents, subcontractors, external consultants, third-party representatives and business partners.

Employees and those under our control must notify a line manager or director as soon as possible if they:

- Believe or suspect a breach of or conflict with this policy has occurred or may occur.
- Have concerns about any issue or suspicion of Modern Slavery in any part of the company's business or its supply chain.
- Are unsure about whether a particular act, the treatment of workers or their working conditions in any part of the company's business or supply chain constitutes any of the various forms of Modern Slavery.

They:

- Should report any incident where there is believed to be a high level of threat or harm to the emergency services, dialling 999 as a first action.
- Are able to report concerns relating to modern slavery or/and human trafficking through the confidential Pellikaan Whistleblowing Policy, without fear of reprisal. We encourage openness and will support anyone who raises a modern slavery/ human trafficking concern in good faith under the policy, even if they turn out to be mistaken. We will also accept and take seriously any concern communicated anonymously.
- Have access to the Modern Slavery 24hour Helpline on 0800 0121 700 and should use the Modern Slavery Victim Support Helpline on 080 8168 9111 in situations where the victim may require professional support.

Due diligence

We have undertaken analysis, which has identified risks associated with modern slavery and human trafficking. These risks occur within our business and our supply chain, and are greater in respect of the latter.

Risk mitigation

We will take ongoing action to reduce risks. Within Pellikaan, we will:

- Mitigate risk of occurrence of modern slavery via strict adherence to our robust HR, Equal Opportunities and Safeguarding policies.
- Only use well-established and carefully vetted recruitment agencies (where we use such agencies to recruit personnel).
- Obtain assurance from recruitment agencies of them being able to fully comply with legislation regarding the rights and welfare of their candidates and employees, and specifically of their compliance with the Modern Slavery Act.
- Operate clear, effective, and easy-to-use incident reporting channels.
- Regularly assess risks – both as they are identified and via periodic, holistic review – normally on annual basis.

Supply chain

Pellikaan engages with its suppliers both to convey our Anti-slavery and Human Trafficking Policy and generate a clear understanding of measures taken by them to ensure slavery and human trafficking is not present in their business or their own supply chain.

We expect our suppliers to:

- Share our values, particularly ethics, integrity and transparency.
- Comply with the Pellikaan Anti-slavery and Human Trafficking Policy.
- Fully comply with the Modern Slavery Act 2015, be accountable and free from ethical ambiguities.
- Specifically prohibit the use of forced, compulsory, bonded or trafficked labour or anyone held in slavery or servitude, whether adults or children.
- Hold their own suppliers to the same standards and ensure compliance.

Supply chain analysis, risk assessment, risk mitigation and monitoring

- We have mapped our supply chain, to assess particular product or geographical risks of modern slavery. Further analysis will take place on a periodic basis.
- Where supplier questionnaires and mini-tenders are used to procure products or services, we will introduce pre-screening – by asking potential suppliers to self-certify on safeguarding controls relating to modern slavery, human trafficking and ethical trading within their own business.
- We will exclude any bidder (under competitive procurement or otherwise) which has been convicted of an offence under the Modern Slavery Act 2015.
- Our supplier contracts will make it clear that the supplier must ensure and bears responsibility for ensuring compliance across its own supply chain.
- We monitor suppliers by requesting copies of their own legally compliant Anti-slavery and Human Trafficking Policies and requesting specific information on how they manage and mitigate risk in connection with slavery and human trafficking.
- We maintain the right to carry out audits – either routinely or at any time of reasonable suspicion. (Pellikaan contracts and negotiated SLA's will provide us with an accepted right to audit.)
- We terminate contracts and relationships where there is a breach of our policy.

KPI's

The following KPI's will be monitored by our Board of Directors:

- Regularity of staff training.
- Impact of staff training (assessed periodically via anonymous completion of questionnaires).
- Number of supplier reviews/ audits carried out.
- Number of whistleblowing cases related to modern slavery reported and resolved.

Training

Training will be delivered to employees at two levels – awareness and management. It starts with general awareness training delivered to all employees, followed by periodic (normal minimum is annually) refresher training. All training will cover our policy, policy implementation and expectations and the types of risk faced by Pellikaan in its supply chain.

Managers responsible for purchasing activity will also receive specific training in identifying slavery and human trafficking in Pellikaan's supply chain, with regular refresher training provided.

In addition to the above, new entrants to our business will receive detailed induction training.

All employees will be made aware of the Pellikaan Anti-slavery and Human Trafficking Policy and how to report suspicions/ incidents. They will be issued with copies, with current policies immediately accessible via our company intranet.

Furthermore, periodic emails will be issued – for example, sharing examples of modern slavery and human trafficking reported in the media.

Breach of the Policy

Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct.


The company may terminate its commercial relationship with suppliers, subcontractors and others in the supply chain if they breach this policy and/or are found to have been involved in Modern Slavery.

Authorisation and review

This policy has been approved at the highest level within Pellikaan, carrying authorisation by our Managing Director (MD) on behalf of the board of directors. The board, led by our MD, is responsible for compliance with our legal and ethical obligations and for the implementation of this policy. Directors and Line Managers are responsible for ensuring that those reporting to them understand and comply with this policy.

The policy will be reviewed periodically and as a minimum annually – to ensure ongoing compliance, effectiveness of risk assessment/ mitigation and application of best practice.

Signed:



Date: 17 January 2018

Last reviewed : 15 November 2024

Name: Gert-Jan Peeters

Designation: Managing Director