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**STANNINGLEY ENGINEERING LTD**

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# Slavery and Human Trafficking Policy

Project Title	<b>SEL INTERNAL DOCUMENT</b>				
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Document / Project No.	<b>SEL/SLAVERY</b>	Issue	<b>06</b>	Date	<b>21/09/2021</b>
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<b>Authorising Manager</b>					
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_____ <b>(Name)</b>		_____ <b>(Signature)</b>		_____ <b>(Date)</b>	

**Revision Register**

*To be reviewed annually as a minimum*

Issue	Clause	Revision description	Date	Approved By
1	All	Initial issue	15/12/2016	M Robinson
2	All	Annual Review	15/11/2017	S.Baldwin
3	All	Annual Review	15/11/2018	G.Sudron
4	All	Annual Review	19/02/2020	A Webster
5	All	Inclusion of child labour	30/09/2020	A.Webster
6	All	Annual Review	21/09/2021	A.Webster

## **INTRODUCTION FROM THE MANAGING DIRECTOR**

Slavery and human trafficking remains a hidden blight on our global society. We all have a responsibility to be alert the risks, however small, in our business and in the wider supply chain. Staffs are expected to report concerns and management are expected to act upon them.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms such as slavery, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a persons liberty by another in order to exploit them for personal or commercial gain. Stanningley Engineering Ltd have a zero tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all of our business relationships and to enforcing and implementing effective systems to ensure modern slavery is not taking place anywhere in our business or supply chains.

## **ORGANISATION'S STRUCTURE**

Formed in 1983, Stanningley Engineering Ltd is a family owned and run company providing high quality, cost effective mechanical and civil engineering solutions within the Utilities sector.

The Company has an annual turnover in excess of £4.4m.

## **OUR BUSINESS**

Our business is organised into three business units: mechanical, civil and E & I.

## **OUR SUPPLY CHAINS**

Our supply chains include the sourcing of raw materials principally relating to the provision of Mechanical & Civil Engineering.

## **OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery Policy 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.

## **CHILD LABOUR**

Stanningley Engineering will not work with any other organisation, whom directly or indirectly have arrangements within their supply chain for the potential of using child labour in the working processes.

By UK Law, the youngest age a child can work part-time is 13, except children involved in areas like: television, theatre and modelling.

Children can only start full time work once they've reached the minimum school leaving age – they can then work up to a maximum of 40 hours a week.

Once someone reaches 16, you may need to pay them through PAYE

Once someone reaches 18, adult employment rights and rules then apply

In England, a young person must be in part-time education or training until they're 18

### **Restrictions on child employment**

Children are not allowed to work:

- Without an employment permit issued by the education department of the local council, if this is required by local bylaws
- In places like a factory or industrial site
- During school hours
- Before 7am or after 7pm
- For more than one hour before school (unless local bylaws allow it)
- For more than 4 hours without taking a break of at least 1 hour
- In any work that may be harmful to their health, well-being or education
- Without having a 2 week break from any work during the school holidays in each calendar year

There are also special rules which only apply during term times and school holiday times – [www.gov.uk](http://www.gov.uk)

## **DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

As part of our initiative to identify and mitigate risk -

- We limit the geographical scope of our works to ensure optimum supervision.
- Where possible we build long standing relationships with suppliers and make clear our expectations of business behaviour;
- With regards to national or international supply chains, our point contact is preferably with a UK company or branch and we expect these entities to have suitable anti-slavery and human trafficking policies and processes. We expect each entity in the chain to, at least, adopt 'one-up' due diligence on the next link in the chain. It is not practical for us (and every other participant in the chain) to have a direct relationship with all links in the chain, ultimately to the field or utility generator.
- We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.

## **SUPPLIER ADHERENCE TO OUR VALUES**

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors comply with our values.

The Directors and Project Managers are responsible for compliance in their respective areas of work and for their supplier relationships.

## **COMPLIANCE WITH THE POLICY**

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for SEL or under our control. You are required to avoid any activity that might lead to or suggest a breach of this policy.

If you suspect a possible breach of this policy then it must be reported to SEL management.

## **OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING**

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

- Suppliers and contractors complete assessment questionnaires prior to SEL working them.
- Use of labour monitoring and payroll systems; and

- Communication and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations.

## **BREACH OF POLICY**

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for the current financial year.



M S Robinson  
Operations Director  
Stanningley Engineering Ltd