



**Modern Slavery and Human Trafficking Statement**  
**Financial Year 1<sup>st</sup> January 2018 - 31<sup>st</sup> December 2018**

## **Introduction**

This statement sets out Beaumont Traffic Management's (the Company) actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1<sup>st</sup> January 2018 to 31<sup>st</sup> December 2018.

As part of the construction and civil engineering industry, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities to ensure that its supply chains are free from slavery and human trafficking.

## **Organisational Structure and Supply Chain**

This statement covers the activities of Beaumont Traffic Management.

The Company provides and installs Temporary Traffic Management systems to both large and small companies, local authorities and individuals who require such services.

The Company operates solely in the United Kingdom (UK).

Our procurement activities take place in the UK and our contractors and suppliers are UK based.

We expect our Delivery Partners, organisations and other companies we engage with to ensure their goods, materials and labour-related supply chains:

- **Fully comply with the Modern Slavery Act 2015;** and are
- **Transparent, accountable and auditable;** and are
- **Free from ethical ambiguities.**

The Company has not identified any of its activities that are at high risk of slavery or human trafficking.

## Responsibility

Responsibility for the Company's anti-slavery initiatives are as follows:

- **Policies:** The HR and Development Officer is responsible for the development and the implementation of all internal HR policies and procedures. These are policies that are already in place and will be regularly reviewed and developed to fit with new and existing legislation and business needs.
- **Investigations / due diligence:** The HR and Development Officer and Office Manager will carry out all investigations required, should instances of suspected slavery and human trafficking be identified. The Company Directors will carry out any disciplinary action or take any decisions to terminate contracts with Companies found not to comply with The Act.
- **Training:** Formal training has yet to be delivered within the Company, this is being developed further and is the responsibility of the General Manager

## Relevant Policies

The Company annually reviews all of its internal policies and procedures. Any necessary amendments will be made during this review to ensure that they remain compliant and incorporate the Modern Slavery Act 2015.

## Due Diligence

The Company will undertake due diligence when considering taking on new suppliers and regularly reviews its existing suppliers. The Company's due diligence and reviews will include:

- Evaluating the modern slavery and human trafficking risks of each new supplier;
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship should it be found that any part of their product or service is delivered based on the use of slave labour.

## Performance Indicators

The Company has reviewed its key performance indicators (KPIs) in light of the Modern Slavery Act 2015. As a result the Company:

- Requires all staff working within the Company to have training on modern slavery.
- Adds a provision in it's tender/ contract documentation which includes the mandatory exclusion of any bidder who has been convicted of an offence under section 1,2 or 4 of the Modern Slavery Act 2015.
- Seeks legal advice and consider imposing in new contracts, that we enter into, provisions for termination in the event of a modern slavery or human trafficking compliance breach by the supplier.
- Conducts a review of its existing supply chain every 12 months.

## **Training**

The Company will require all staff working in the Company to complete training on modern slavery. This is delivered at two levels and will cover:

### **Level 1- Directors and Management**

- Our Company's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below the UK's national living wage, or the provision of products by an unrealistic deadline;
- How to assess the risk of slavery and human trafficking in relation to various aspects of the business including resources and support available;
- What steps the Company should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the Company's supply chain.

### **Level 2- Directors, Management and Operatives**

- How to identify the signs of slavery and human trafficking;
- What initial steps should be taken if slavery or human trafficking is suspected;
- How to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
- What external help is available.

### **Awareness-raising Programme**

As well as training staff, the Company will raise awareness of modern slavery issues, by putting up posters across the Company's premises and circulating emails to staff.

The posters and emails will explain to staff: -

- The basic principles of the Modern Slavery Act 2015;
- How employers can identify and prevent slavery and human trafficking;
- What employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the Company;
- What external help is available, for example through the Modern Slavery Helpline.

**Yearly actions**

- Undertake an annual assessment to determine our risk exposure.
- Raise general Company awareness by recirculating information to all staff.
- Enforce our Whistleblowing policy.
- Review and where necessary update the Employee Handbook.
- Update and if necessary update our Supplier/Procurement code of conduct.
- Review our Recruitment/ Agency workers policy.

This Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Beaumont Traffic Management’s Slavery and Human Trafficking Statement for the financial year ending 31<sup>st</sup> December 2018. This has been approved by the Company Directors who will review and update annually.

Signed:  ..... Date: .....10<sup>th</sup> January 2018...  
Mr. N Beaumont  
**Director (Operations)**

Signed:  ..... Date: .....10<sup>th</sup> January 2018...  
Mrs. D Tonks  
**Director (Admin)**