

## Delron Services Ltd - Modern Slavery and Human Trafficking Statement

Financial Year from 1<sup>st</sup> March 2019 to 29<sup>th</sup> February 2020

### Introduction

Pursuant to Section 54 of the Modern Slavery Act 2015, whilst there is no legal obligation for Delron Services Ltd (DSL) to produce an annual statement, we are absolutely committed to preventing slavery and human trafficking in our corporate activities, and to ensuring that our supply chains are free from slavery and human trafficking.

Staff are expected to report concerns and management are expected to act upon them. The board of directors are responsible for policies, training, assessing risk and investigations into any potential issues regarding modern slavery and human trafficking.

DSL will not support, or deal with, any business knowingly involved in slavery or human trafficking.

### Organisational structure and supply chains

DSL is a building engineering services contractor operating wholly within the South East of England. The limited geographical scope of our business enables us to ensure optimum control and supervision of the work environment.

As part of our initiative to identify and mitigate risk, where possible, we build long standing relationships with local suppliers and make clear our expectations of business behaviour. We operate an approved supplier list for purchasing and this is adhered to wherever possible. Any deviation from approved suppliers must be authorised by a director. A large majority of our approved suppliers are large national and multi-national companies.

### Definition

DSL considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restriction placed on freedom of movement.

### Relevant policies:

- **Recruitment Policy** Our recruitment policy includes checks to ensure that employees and labour only subcontractors are eligible to work in the UK to safeguard against individuals being forced to work against their will and human trafficking.
- **Whistleblowing Policy** We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.
- **Ethical Conduct Policy** DSL strives to maintain the highest standards of employee conduct and ethical behaviour at all times, including when managing its supply chain.

- **Agency Workers Policy** The board has identified the use of labour agencies as a high risk area, as we are not in control of the background screening of the operative supplied. Consequently, we have implemented a policy of only using two highly reputable global agencies, both of whom are on our approved supplier list, and with whom we have a long standing business relationship.

#### **Due diligence**

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers.

#### **Training**

All DSL directors have been briefed on the potential risks of modern slavery and human trafficking in our supply chains and our business, and how to spot the signs, and this is cascaded down to our procurement team in order to raise awareness.

#### **Key Performance Indicator**

We will know that the steps we have taken are successful in ensuring that there is no slavery or human trafficking in our supply chain if we do not receive any reports from employees, the public or law enforcement agencies to indicate that such practices have been identified.

#### **Approval for this Statement**

This statement was approved by the DSL's board of directors, who will review and update it annually.



Signed:

**R Bryant, Managing Director, Delron Services Ltd**

**Date: 29<sup>th</sup> February 2020**

**Policy review date: February 2021**