

# Modern Slavery Act Transparency Statement 2019

This statement has been published in accordance with Section 54(1) of the Modern Slavery Act 2015. It sets out the steps that Hercules Site Services has taken in 2019 to prevent slavery and human trafficking taking place in any part of its business or that of its supply chain.

## Our Business

Hercules Site Services was founded in 2008 and is recognised nationally as a construction, utilities and civil engineering organisation with high ethical standards and a passion for providing clients with a reliable service of the highest quality within the civil engineering industry, delivering labour supply and subcontract packages. The Hercules team prides itself on its community support, high moral values and integrity.

The company Head Office is based near Cirencester although our large workforce spans the entire length and breadth of the UK, with most projects utilising locally trained individuals to facilitate the works. Within the last few years the company has expanded into other sectors of the construction industry.

## Our Codes of Conduct

Modern Slavery is a crime and a violation of our fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking. The International Labour Organisation (ILO) estimates that at any one time over 40 million men, women and children are working in conditions of modern slavery, including trafficked persons. The vast majority of these people are in the supply chains of legitimate industries.

We are committed to operating responsibly, particularly with regard to human rights issues and Hercules is certified to BES 6002 Certification Ethical Labour Sourcing with BRE Global. We will not tolerate human trafficking and other kinds of slavery within our operations. Our people and those we work with are encouraged to challenge any unethical, dishonest or unacceptable behaviour they encounter and to speak up if they see things that don't meet our high standards.

## Our Policies

We have in place a number of key policies which explicitly state how we operate as a business and the steps taken to ensure that we are a transparent, accessible and inclusive organisation. In 2019 we added a new policy - "Ethical Business Practice Policy". All of our policies are available on our website [www.hercules-construction.co.uk](http://www.hercules-construction.co.uk) and are communicated to every employee upon joining the company and whenever any updates are made. Our relevant policies include:

- Anti-Slavery Policy
- Ethical Business Practice Policy
- Equality, Diversity & Inclusion Policy
- Whistleblowing Policy

We conduct a review of all policies annually, making updates where required to ensure all ethical business practices are suitably covered. We continually assess our business processes and have a whistleblowing procedure in place to ensure their continued effectiveness. In 2016 we implemented our Anti-Slavery Policy Statement, making its requirements a mandatory condition of employment.

## Risk Assessment

In 2019 we established a cross-organisational working group on modern slavery in 2019. The working group, consisting of members of HR, SHEQ, Recruitment, Operations, and CSR, worked together to improve our processes around modern slavery. The group conducted further risk assessment of our operations, identifying that the biggest exposure we face to modern slavery and human trafficking is through our recruitment practices, including Right to Work and identity checks. Our risk assessment was carried out against the likelihood of the following traits of slavery and human trafficking occurring:

- Forced Labour
- Work and life under duress

This has enabled us to prioritise our Right to Work and ID checks, ensuring that the measures we have in place to identify any discrepancies are effective.

The risk assessment also considered the risks associated with sub-contractors and through our supply chain.

## Our People

We undertake action to prevent modern slavery and human trafficking within our own organisation through:

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- Regular inspections are carried out by trained staff on a monthly basis at a minimum throughout the entire organisation, both in Head Office and on site, against a checklist of alert flags. If any alert flags have been raised this is escalated to a full investigation.
- All employees are provided with information about their statutory rights, including sick pay, holiday entitlements, parental leave, flexible working and any other benefits to which they may be entitled.
- Hercules pays all of its employees at least the minimum living wage and we ensure that we comply with all legal requirements.
- All new employees are subject to rigorous pre-employment checks to ensure their right to work in the UK and to confirm their identity. This includes the employee being able to provide evidence that they are in possession of their own identification documents.
- In 2019 we introduced and implemented the Modern Slavery Induction Checklist, which confirms evidence of identification provided and that no fees were paid to obtain work. It also ensures that Modern Slavery awareness training has been carried out, signs of potential victims have been verified at induction by the Operations Team, and that Stronger2gether leaflets have been issued. The induction Checklist also offers helplines if any suspicion of slavery has been raised.
- We ensure that bank account details provided for the payment of salary match the name of the employee and where discrepancies arise we investigate and may require further assurance to ensure the employee is not subject to modern slavery. Where documents which link the employee with the payee cannot be provided, this is escalated to senior members of the HR Team and Modern Slavery Working Group for assessment. We also conduct thorough audits of, and investigate any instances, where more than one employee's salary is being paid into any single bank account.
- Hercules managers carry out direct face to face checks with all employees (potential candidates, new employees and existing staff) and communicate awareness of the signs of modern slavery in the workplace, ensure every employee has access to helplines and information, and to conduct any necessary checks or investigations if any concerns have been raised.
- We have a confidential whistleblowing procedure. There were no reports of human rights, slavery or human trafficking via the whistleblowing process in 2019.
- In addition to our whistleblowing process, our free confidential Employee Assistance Programme is available 24/7 to all employees on issues such as financial, legal, workplace, family and health. Employees are made aware of the support available as part of the induction process and via our company newsletter.
- Developments in 2019 of our Recruitment & Personnel Management System has made the verification of Right to Work and personal documents even more failsafe due to the automatic checks with the systems, whereby any replication of details, e.g. mobile telephone numbers, next of kin details, address, bank details, are automatically flagged on the system for further investigation.

### Due Diligence of Our Supply Chain

We conducted a review of our procurement processes and our supplier approval procedure:

- Our Supplier Approval Questionnaire requires suppliers to provide copies of their Modern Slavery Policy Statements as part of the process.
- Suppliers are required to confirm the actions they are taking to ensure labour exploitation, modern slavery and human trafficking are not taking place in any part of their business or supply chain.
- Suppliers are expected to comply with all applicable laws, statutes, regulations and codes.
- We require, where appropriate, that our suppliers hold certification via a reputable accreditation scheme provider (e.g. ISO, UVDB, RISQS).
- We do not utilise suppliers that are based in or sourcing from high risk countries of origin.
- Risk mapping is carried out on all suppliers prior to approval and, where higher risk is identified, full risk assessment is undertaken. Where necessary, supplier visits are organised.

## Raising Awareness

Raising awareness both internally and externally of the human rights aspects of slavery and trafficking is a fundamental step in preventing it occurring within our operations. We know that unethical labour practices, including slavery and human trafficking, are hidden. We have robust policies and procedures in place setting out our stance and how we must operate. We recognise that raising awareness of the human rights aspects of slavery and trafficking is a fundamental action in bringing to light any issues within any part of our business or our supply chain.

- In 2019 we made modern slavery training mandatory for certain identified roles within the organisation and 100% of identified roles and employees have completed the training to date. Identified roles include:
  - Directors
  - Operations Team
  - Human Resources
  - Senior Management
  - Recruitment Team
  - Site Management
- All Hercules employees have access to e-learning modules on modern slavery via the Supply Chain Sustainability School, with which we are Partners and Gold Members, and this learning is actively encouraged.
- In 2019 we rolled out further training for front line supervisors in the form of tool box talks and video training, promoting awareness of the typical signs of someone working in enslaved conditions. This training also includes how to report concerns either via the whistleblowing process or to Hercules leadership.
- In 2019 we further raised awareness of modern slavery throughout the entire organisation via the company newsletter, posters on staff noticeboards, video training, tool box talks and briefings on site.
- We held a Slavery & Human Trafficking Awareness Training Workshop at Hercules Head Office in 2019 for Anti-Slavery Day using Stronger Together resources to help highlight the tell-tale signs of a victim.

## Partnerships

### Supply Chain Sustainability School

Hercules is a partner of the award-winning Supply Chain Sustainability School, a free training provider for the industry covering a wide range of topics including modern slavery. As a partner, we promote access to the school's resources to our employees and supply chain.

Since 2017 we have been active members of the school's Infrastructure Leadership Group and our staff have chaired the Minimum Standards Labour Group within the school in which they are tackling key issues such as Modern Slavery, Right To Work, EDI and FIR, Living Wage, Labour Standards, Skills and Training, Environment & Performance, and Employment Conditions.

In 2019 we became actively involved through the Infrastructure Leadership Group with the People Matter Charter, to be launched in 2020.

### GLAA Construction Protocol

In 2018 Hercules signed up to the Gangmasters and Labour Abuse Authority's Construction Protocol. This is a joint industry agreement aimed at eradicating slavery and labour exploitation, committing signatories to:

- Work in partnership to protect vulnerable workers
- Agree to share information, where possible, to help stop or prevent the exploitation of workers
- Work together to manage information sensitively and confidentially
- Commit to raising awareness within the supply chain
- Maintain momentum through this protocol by communicating regularly

In 2019 we joined the GLAA working group and are active members at the GLAA Construction Protocol events and forums.

### RISQS Modern Slavery Working Group

In 2019 we became active members of the RISQS Modern Slavery Working Group, working together with representatives from the rail industry to raise awareness and tackle slavery and labour exploitation within the industry.

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## **Stronger Together**

In 2019 Hercules became a Business Partner with Stronger Together, a multi-stakeholder business-led initiative aiming to reduce modern slavery particularly forced labour, labour trafficking and other hidden third-party exploitation of workers. They provide guidance, training, resources and a network for employers, labour providers, workers and their representatives to work together to reduce exploitation.

## **Next Steps**

Whilst a number of our processes have been improved so we have a greater understanding of modern slavery in our own business and our supply chain and how to mitigate it, there is more to do within our organisation. These will be our key areas of focus in the coming 12 months:

- Join the Stronger Together “Responsible Construction Recruiters” Working Group and play an active role in making the certification of Labour Providers in Modern Slavery processes a mandatory requirement in the Construction Industry. We already have seats on this committee confirmed from January 2020.
- Ensure that the objectives of the “People Matter Charter” around Modern Slavery are integrated into our processes and those of our supply chain.
- Internal Audit on Modern Slavery has been added to the Internal Audit Programme for 2020 in order to monitor and assess the risks of modern slavery and ensure compliance through site induction due diligence, management meetings and site visits.
- Further Stronger Together “Tackling Modern Slavery in the Construction Industry” training course has been organised for January 2020 in Hercules Head Office, providing further thorough training to employees.
- Further our impact in this issue by working together with victim rehabilitation organisations to offer work opportunities in the construction industry to ex-victims of modern slavery through a Victim Re-integration Scheme.
- Work in collaboration with our clients to ensure posters and leaflets on Modern Slavery and signposts to help for victims are a constant on site in numerous languages.
- Modern Slavery KPIs have been set for 2020 and these are to be monitored and reviewed quarterly by the Modern Slavery Working Group.

This statement covers the period 1 January 2019 to 31 December 2019 and has been approved by the Managing Director of Hercules Site Services Ltd.

Brusk Korkmaz  
Managing Director