

MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT 2018/2019

Introduction

Modern slavery encompasses slavery, servitude, human trafficking, forced and compulsory labour. The Company has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our Business Structure

Gavin Jones was established in 1919 and joined the Nurture Group in 2018.

We remain a UK based landscape service provider operating nationally with the support of 500 employees covering the full grounds maintenance services of exterior and interior landscaping, arboriculture and design and build.

Our Supply Chains

We seek to build lasting relationships with our suppliers and they are key to our service delivery as well as our commitment to our Modern Slavery and Human Trafficking Policy.

We are committed to respecting the rights of workers throughout our business including our supply chains.

We operate a supplier policy and maintain a preferred supplier list.

Our expectations are in accordance with the provisions of the [Ethical Trading Initiative Base Code](#), which is founded on the conventions of the International Labour Organisation (ILO) and is an internationally recognised code of labour practice as follows:

- **Employment is freely chosen** – there is no forced, bonded or involuntary prison labour; workers are not required to lodge “deposits” or their Identity papers with their employer and are free to leave after reasonable notice.
- **Freedom of association** – including the right to form or join trade unions without discrimination
- **Working conditions are safe and hygienic** – in accordance with the prevailing knowledge of the industry and specific hazards. Risk assessments and safe method of working are in place and adequate steps taken to prevent accidents and injury to health at work. Workers must receive regular and recorded Health & Safety training and have access to clean toilet facilities and potable water.
- **Child labour shall not be used**
- **Living wages are paid** and all workers to be provided with written and understandable information relating to their employment conditions, including rate and timing of pay.

- **Working hours are not excessive** – compliant with national laws and regulation.
- **No discrimination is practiced** – in relation to hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.
- **Regular employment is provided** – to every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.
- **No harsh or inhumane treatment is allowed** – physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

In addition we seek confirmation from our suppliers and subcontractors that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. (For UK based suppliers) They pay their employees at least the National Living Wage.
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
5. We may terminate the contract at any time should any instances of modern slavery come to light

Our supply chain is primarily UK based with the remainder being EU suppliers. These remain generally recognised as being at lower risk of Modern Slavery issues.

Our Policies on Modern Slavery

At Gavin Jones we are committed to ensuring there is no modern slavery, human trafficking or unethical treatment of our employees or in any part of our supply chain. In our commitment to this we operate a number of internal and supplier policies which work in isolation and in combination to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Modern slavery and human trafficking policy. This policy sets out the organisation's stance on modern slavery and explains how instances of it can be identified as well as where to go for help.
2. Anti Bribery policy.
3. Company Values. This details our organisational and individual commitment to others and that of our employees.
4. Modern Slavery and Human Trafficking Suppliers Code of Conduct. This code explains the manner in which we expect our suppliers to act in their dealings with us, their employees and their suppliers.
5. Equality policy.
6. Ethical Conduct policy.
7. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.

8. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

Our Due Diligence Processes and Risk Assessment

Gavin Jones has a zero tolerance to illegal working and our onboarding procedure follows the Home Office guidance. Right to Work checks are conducted to ensure that our employees are lawfully in the UK and have the right to work. Action is taken if any issues are identified.

We only use large, well known and long established recruitment agencies or direct recruitment methods which reduce the risk of Modern Slavery and Human Trafficking instances occurring in our work teams.

Since our first statement in 2018 further assessments confirm that our supply chain remains low risk being primarily UK based with the remainder EU suppliers. Over the last 12 months we have introduced more robust supplier and sub-contractor questionnaires to assess our supply chain in terms of compliance with the Modern Slavery and Human Trafficking Act 2015, both in the tender process and on-going. We also have a supplier Code of Conduct and our standard supply chain contract has been updated to include automatic termination of the contract in the event of any breach of the Act or our Code of Conduct.

Measuring Effectiveness

With the application of our internal policies and procedures, we remain confident that our direct workforce is free from slavery and human trafficking. The measures that we have in place regarding our supply chain due diligence will over time demonstrate that we are fulfilling our obligations.

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

No validated reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified, which we could have identified from our processes and procedures.

Over the past year we have not identified any breaches of the Act or our Code of Conduct in either our direct workforce or our supply chain.

Training

In April 2018 we designed and undertook a training session to all employees which provided information to help them understand what modern slavery is, our business stance to it as well as potential signs of modern slavery. We also provided information to raise awareness on the actions they should take to report Modern Slavery. Our aim is to update and deliver this session as refresher training on regular intervals.

Additional training will be undertaken as and when identified.

Responsibility , Implementation and Approval for this statement

The Company Board of Directors have approved this Modern Slavery and Human Trafficking Statement.

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out our Modern Slavery and Human Trafficking Statement for the financial year ending 31st March 2019



Signature:
Peter Fane
Managing Director

Date: 9th April 2019