

# ***Highways England Anti-Slavery (Human Trafficking) policy***

***Policy Number/Reference: HEPOL0088***

## **Policy information**

<b>Authors</b>	<i>Sharon McCarthy Corporate Assurance Director John Farley C&amp;P Improvement Director</i>
<b>Owner</b>	<i>Malcolm Dare, Commercial and Procurement Executive Director</i>
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## **INTRODUCTION**

- 1 Modern slavery is the illegal exploitation of people for personal or commercial gain. Victims are controlled by force, threat, coercion and deception. It can take various forms including trafficking of people, forced labour, sexual or criminal exploitation or domestic servitude.
- 2 Highways England is committed to doing business in a sustainable and responsible way. This includes doing all that we reasonably can to prevent all forms of modern slavery in any part of our business and supply chain. We expect our customers and suppliers to do the same. We will act ethically and with integrity in all our business dealings and relationships. We will implement and enforce effective systems and controls to prevent, deter and detect any forms of illegal exploitation.

## **POLICY STATEMENT**

- 3 Highways England complies with all applicable legislation, including the Modern Slavery Act, 2015 and the Human Rights Act 1988. We respect the human rights of all those who work for us or on our behalf and provide them with a safe working environment and fair terms of employment. We are committed to preventing illegal and unethical labour practices occurring in any part of our business or our supply chain. This is consistent with our disclosure obligations under the Modern Slavery Act 2015 (the publication of an annual Anti-Slavery Statement). We expect the same high standards from all our contractors, suppliers and other business partners.
- 4 This policy is owned by the Executive Director, Commercial and Procurement and has been approved by the Board. It will be reviewed on an annual basis and updated in accordance with changes in legislation.

## **POLICY SCOPE**

- 5 Highways England is fully committed to preventing illegal and unethical labour practices occurring in any part of its business or its supply chain. Everyone has a responsibility to speak out if they have concerns relating to human rights violations, acts of modern slavery or people trafficking. This includes raising concerns about those we do business with or those who do business on our behalf.
- 6 This policy applies to everybody who works for, or on behalf of, Highways England in any capacity. This includes, but is not limited to, all employees, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners, who must ensure that they have read, understood and therefore comply with this policy.
- 7 The Highways England Board has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. The Commercial and Procurement Improvement Director has primary and day-to-day responsibility for implementing this policy. This includes monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- 8 All managers are responsible for ensuring those reporting to them understand and comply with this policy. Those employees working in areas deemed to be of 'high risk' will be given adequate training on this policy and the issue of modern slavery in our supply chains.

## REQUIREMENTS FOR THIS POLICY

### Warning signs

- 9 All staff should be vigilant in recognising some tell-tale signs that something may be wrong, such as:
- workers who do not have written contracts of employment
  - workers who have had to pay fees to obtain work
  - workers who are not able to prove they are legally entitled to work in the UK
  - many workers listed as living at the same address that may indicate high shared-occupancy, often a factor for those being exploited
  - agencies charging suspiciously low rates against standard industry pricing.
- 10 We expect high standards from all our contractors, suppliers and business partners. This includes the need to comply with all applicable laws and regulations and publish their own Anti-Slavery Statement, where they are legally required to do so. Consideration of modern slavery risk is built into our procurement processes as part of our due diligence activities. Our procurement contracts require suppliers to comply with the Modern Slavery Act 2015, in addition to other relevant policies, including our Code of Business Ethics, Code of Conduct (for suppliers/contractors) and our Raising Concerns at Work (whistleblowing) policy. We also include specific requirements that our suppliers implement due diligence procedures for their own supply chains. They must use reasonable endeavours not to purchase raw materials, resources or products from organisations using forced labour.
- 11 We expect our suppliers to hold their own suppliers to these same high standards. We have a range of measures to take should modern slavery be identified. This ranges from normal contract management levers to the potential to use our strategic supplier relationship management discussions to negotiate appropriate action. We may also choose to terminate our relationship with individuals and organisations working on our behalf if they are found to be in breach of the Modern Slavery Act, 2015.

### Speaking out

- 12 All staff have a responsibility to raise concerns about any issue or suspicion of modern slavery in any part of our business or any tier of our supply chain at the earliest possible stage. If you believe, suspect or are unsure whether a breach of this policy has occurred or that it may occur you must notify either:
- Your line manager or your divisional director
  - the Head of Counter Fraud, Corporate Assurance, the Corporate Assurance Director or the company General Counsel
- You can use our Raising Concerns facility ([Whistle\\_Blowing@highwaysengland.co.uk](mailto:Whistle_Blowing@highwaysengland.co.uk) or telephone 0300 470 3680 (24hr answer phone)). If you suspect someone might be a victim of modern slavery and are concerned that they are in immediate danger, contact 999, prior to informing anyone else on the list above.
- 13 For further information, please refer to the company's Raising Concerns at Work (Whistleblowing) Policy. Given the level of risk, this needs to be done as quickly as possible without raising any undue suspicion. We will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment because of reporting their suspicions in good faith. This applies if any form of modern slavery is, or may be, taking place in any part of our own business or in any of our supply chains.

### Communication and awareness of this policy

- 14 All employees are expected to complete the company's Economic Crime e-learning found on the LEARN platform. Additional tailored training will be provided to specific teams, where necessary.

- 15 Our commitment to preventing all forms of modern slavery will be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Responses to reports of suspected breaches of modern slavery

- 16 Modern slavery is a criminal offence and the Highways England's Counter-fraud team will review any suspected breaches of the Modern Slavery Act and take appropriate action. This is likely to include liaison with the Home Office and the Gangmasters and Labour Abuse Authority.

**MONITORING**

- 17 The prevention, detection and reporting of suspected modern slavery activity in any part of our business or supply chains is the responsibility of all those working for us or under our control. All staff are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 18 Contract managers have an obligation to hold their contractors to the terms of their contract. This includes the regular monitoring of compliance with contractual obligations, such as compliance with UK legislation, including the Modern Slavery Act, 2015. Periodic checks will be performed by the business area, in accordance with the company's management assurance process.

**POLICY BREACH**

- 19 Highways England considers a breach of this policy as a serious offence. Any violation or failure to report a potential or suspected case of slavery, as defined by this policy, may result in disciplinary action, in line with the company's Disciplinary Policy. We may terminate our relationship with other individuals and organisations working on our behalf if they are found to breach this policy.

## Document information

### Revision history

Version		Date	Description	Author
1.0		February 2021	Draft	Sharon McCarthy
2.0		June 2021	Final	Sharon McCarthy

### Reviewer list

Name ( <i>individuals or the part of the organisation that has reviewed the document as they have a direct interest in it</i> )	Date of issue	Version
Anti-Economic Crime Group	3 February 2021	1.0
Executive team	16 February 2021	1.0
Highways England Board	March 2021	1.0

**Document sign-off** (*This must include the policy owner and for corporate level policy it must be agreed by the Executive and approved / endorsed by the Board; and for lower level or smaller process policy it must be agreed by the Executive sub-group and approved / endorsed by the Executive*)

Name	Signature	Title	Date of issue	Version
Malcolm Dare		<i>Executive Director, Commercial and Procurement</i>	February 2021	
Executive			February 2021	
Highways England Board			June 2021	