



Modern Slavery Statement of Policy

Organisation

This statement applies to Paramount Trades and Labour Ltd (referred to in this statement as 'the Organisation' or 'the Company'). The information included in the statement refers to the financial year 2018/2019.

Organisational structure

Paramount Trades and Labour Ltd is an employment business that is expert in specialist recruitment within the construction sector. With over 75 years' combined experience in the industry, the company provides assignments on temporary and contract basis within the UK on all levels. There is one centralised office based in London from which the company operates. We supply workers to the private market sector for residential, industrial, commercial and retail, hotel, leisure and sport, education and infrastructure projects.

The senior management level of the organisation is comprised by a Board of 2 Directors and 6 shareholders and its annual turnover is £16, 000000.

As a construction recruitment agency, we work closely with both clients looking to recruit staff and workers looking for construction jobs. It is our commitment to ensure that the workers we send to site have the necessary skills and safety knowledge to do the job to an excellent standard in the markets we specialise in, as well as following UK industry standards. We comply with the employment law as a minimum.

Definitions

The Organisation 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

Commitment

The Organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Organisation does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to or by the Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in UK.

Supply chains

Our supply chains include, but are not limited to, sourcing candidates for clients. This very rarely may involve the introduction by external agencies to Paramount of candidates for onward supply to our clients or referrals by other individuals. On those occasions we perform our own vetting. Our Ethical Trading Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

In order to fulfil its activities, the secondary supply chains of the Organisation include those related to the supply of technology, supporting services such as payroll, IT, printing, training, advertising platforms etc. We expect our suppliers and potential suppliers to aim for high ethical standards and to operate in an ethical, legally compliant and professional manner by adhering to our Supplier Code of Conduct. We also expect our suppliers to promote similar standards in their own supply chain.

Potential exposure

The Organisation considers its main exposure to the risk of slavery and human trafficking to be relatively limited. Nonetheless, we always take steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it. The company recognises the existing risk in the areas of provision of labour via subcontractor suppliers and therefore we always liaise with workers direct and not potential representatives or subcontractors.

Steps

The Organisation carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Organisation has taken the following steps to ensure that modern slavery is not taking place:

- Policies: The Business Director is responsible for putting in place and reviewing policies and the process by which they were developed.
- Risk assessments: The Approved Suppliers list is reviewed to ensure the information is current. The regular Suppliers are checked and are scheduled on the Management Review meetings to ensure continued compliance with required standards. Where possible we build long standing relationships with suppliers and make clear our expectations of business behaviour;
- Investigations/due diligence: The Business Director and the Operations Manager are responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking.
- Training: To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff. All Directors have been briefed on the subject.

Key performance indicators

The Organisation has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in the Organisation or its supply chains.

- requiring all staff to have completed training on modern slavery by December 2016
- developing a system for supply chain verification in place since January 2016 whereby the Company evaluates potential suppliers before they enter the supply chain
- reviewing its existing supply chains completed annually whereby the Company evaluates all existing suppliers

Training

The Company requires all staff within the Company to complete training on modern slavery.

The Company's modern slavery training covers:

- our business'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 a country's national minimum 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
- 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 Company
- What external help is available, for example through the Modern Slavery Helpline, and "Stronger together" initiative?
- What messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies?
- 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 chains

Policies

The Organisation has the following policies, which further define its stance on modern slavery:

- Modern slavery policy;
- Corporate social responsibility policy;
- Supplier code of conduct;
- Recruitment policy;
- Whistleblowing policy.

Slavery Compliance Officer

The Organisation has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the Organisation's obligations.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2010 and will be reviewed for each financial year.

Dated: 1 October 2018

Review date: 1 October 2019

Signed:



Martin Campbell
Managing Director