



Carter Accommodation Ltd

Anti-Slavery and Human Trafficking Policy

V2 Mar 2018

For Financial Year April 2018-March 2019

The following Policy is a statement of the company's general policy regarding Anti-Slavery & Human Trafficking.



## Policy Statement

Carter Accommodation Ltd is involved in the hire and sales, transportation and installation of modular and portable buildings, largely for the construction industry. These can be utilised as welfare units, training rooms, meeting rooms and offices for example. We operate throughout UK Mainland only.

Carter Accommodation Ltd takes a zero tolerance approach to any aspect of slavery and / or human trafficking. We consider that we, as with all companies in the UK, play a vital role in the eradication of modern slavery. This approach applies to all persons working for us or on behalf of the company including all employees, directors, agency workers, apprentices, contractors, external consultants, first tier suppliers and third party representatives or business partners.

We cannot be complacent in the UK. In 2016, 3,805 potential victims of slavery were identified, of which 1278 were children.

Modern slavery includes human trafficking, slavery, servitude and forced and compulsory labour. Exploitation takes a number of forms, including sexual exploitation, forced manual labour and domestic servitude, and victims come from all walks of life. The nature of modern slavery is continuously changing and without robust monitoring and communications it can potentially arise in a part of our operations or supply chain so that we must constantly assess and review these risks as important. Carter Accommodation exercises due diligence to assess and manage the risk.

With the exception of one of our main suppliers in Austria, all of our other suppliers are based in the United Kingdom and we expect that our suppliers will hold their own zero tolerance approach to their own suppliers. This is checked through pre-qualification questionnaires to both suppliers and sub-contractors.

Where a supplier does not meet this expectation, Carter Accommodation can take steps for example asking suppliers to take action to improve, or if necessary, terminate the relationship if the required improvement is not met. This assists suppliers to develop an understanding of everyone's common responsibility to make human rights a reality in each community.

In relation to our own staff, in December 2017 Carter Accommodation carried out a Right to Work audit on all of our employees to ensure that we continue to comply with UK Employment Legislation.

The HSQE Manager oversees initiatives for this policy including policy updates, any relevant risk assessments, due diligence and training (including tool box talks and entry of this policy into our newsletter).

Additionally both employees and suppliers should know how to identify or prevent exploitation: for more information on forms of modern slavery and trafficking please see our document F139 Victims of Modern Slavery: Staff & Supplier information v2 Mar 2018.

In February 2018 the HSQE manager signed up to Antislavery International newsletter and alerts which will help Carter Accommodation, through training, going forward with awareness and potential anti-slavery projects.

If staff suspect that they know someone who is subject to modern day slavery or human trafficking, they must report this immediately to the HSQE Manager, or, in her absence, a director. Staff are actively encouraged to do this. Carter Accommodation encourages openness and will support anyone who raises genuine concerns in good faith, even if they turn out to be mistaken.

Carter Accommodation is committed to ensuring that no one suffers any detrimental treatment or disciplinary action as a result of reporting in good faith.

This policy does not form any part of any employee's contract of employment and we may amend the policy at any time.

If a specific case of modern slavery is identified it will be reported to the police immediately on 101. If potential victims are in immediate danger the standard 999 emergency number will be used. Suppliers must ensure that they do the same.

The Modern Slavery Helpline is also available on 0800 0121 700.

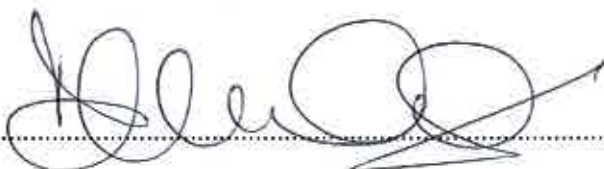
Any employee who breaches this policy will face disciplinary action. We may also terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

This policy is subject to regular review and is available both on our shared company drive and on our company website [www.carteraccommodation.com](http://www.carteraccommodation.com)

Overall responsibility for this policy is with the board of directors. Day to day responsibility of this policy is with the HSQE Manager

Other policies relating to the practice of reporting and this policy include are HR17 Whistleblowing policy, HR07 Equal Opportunities policy, HR08 Equality and Diversity Policy, HR27 Business Ethics Policy and HR28 Anti Bribery and Corruption Policy, and POL011 Work Safe Policy, all of which are held in the company policies folder held in the HSQE Office or on the shared drive in the QA Section of HSQE.

This policy statement constitutes our Anti-Slavery and Human Trafficking policy until financial year end March 2019 unless there is cause for review before that date.

Signed: 

Darren Arnold, MD

Date: 1st March 2018

Revision Number	Revision Date	Change / by (initial)
1	Feb 17	Original
2	Mar 18	As per updated requirements of the relevant act / AR