

The Modern Slavery Act – Risk Assessment

| ASSESSMENT DETAILS | | | POTENTIAL HARM | |
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| <p>The Modern Slavery Act came into force on the 29th of October 2015. Requirements for publishing a slavery and trafficking statement formally comes into effect for financial years ending on or after March 2016. Morris & Spottiswood have a legal as well as moral obligation to comply. The production of this risk assessment is only one in a number of policies and procedures aimed at ensuring such compliance</p> | | | <p>The Modern Slavery Act has been introduced to provide guidance for businesses to protect vulnerable individuals by ensuring that businesses conduct the necessary due diligence against risk of slavery and human trafficking, including compliance within the supply chain. The Controls and triggers listed within this risk assessment have been introduced to reduce the potential for harm as far as is reasonably practicable</p> | |
| RISK | Initial Risk | CONTROLS | TRIGGERS / MEASURES USE TO ASSIST | Final Risk |
| Non compliance with the Modern Slavery Act 2015 | M | <ul style="list-style-type: none"> Production / introduction of MSA Policy Compliance with full requirements of MSA Public statement produced and posted onto the M&S website Compliance with 'other' M&S HR related policies | <ul style="list-style-type: none"> Interested parties comments re public statement MSA included in M&S annual dashboard Inclusion within reports discussed monthly at both divisional & operational board level | L |
| Engaging with a Sub Contractor who does not comply with the Modern Slavery Act 2015 | L | <ul style="list-style-type: none"> Requirement to confirm adherence to MSA included in S/C approval process Statement re MSA included in S/C pre acceptance Statement re MSA included in S/C T&C's Statement re MSA included in S/C escalation process Audits undertaken on high risk and Strategic subcontractors | <ul style="list-style-type: none"> S/C cannot be approved without complying with approval process Monthly review of S/C pre acceptance minutes 'Failing' S/C audited by Group Supply Chain Manager to understand risks and implement corrective actions (as necessary) Examination of Questionnaire responses to identify compliance | L |
| Engaging with a Supplier who does not comply with the Modern Slavery Act 2015 | L | <ul style="list-style-type: none"> Formal tender process implemented for all key spend categories to ensure full understanding of supplier processes and procedures in relation to MSA Statement re MSA included in Suppliers T&C's Risk-based audits undertaken | <ul style="list-style-type: none"> Relationship management of all key category suppliers to ensure compliance with Morris & Spottiswood Group policies and the MSA | L |
| Allowing employees of Morris & Spottiswood not to comply with the Modern Slavery Act 2015 | M | <ul style="list-style-type: none"> Discussion re content of MSA site team requirements Access to all MSA policies and process used in M&S Procedure in place to report 'suspect' instances of MS | <ul style="list-style-type: none"> Signature page received from all site employees for MSA site team requirements MSA training included within M&S annual dashboard All / any suspect instances dealt with immediately then discussed at both divisional & operational board level | L |

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| Engaging individuals through agencies who do not comply with MSA | H | <ul style="list-style-type: none"> • Formal review and assessment process in place for all agencies engaged • Preferred Supplier List of agencies created and communicated through business • MS audits undertaken on all PSL agencies every 3 years to review processes • Ensure all spend for temporary labour is through approved agencies | <ul style="list-style-type: none"> • HR process/Procurement process to ensure only PSL agencies provide temporary labour • Site-based checks on training certificates | L |
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Risk: M = Medium Risk / L = Low Risk