

Modern Slavery and Human Trafficking Policy

Confined Space Group Ltd



1. Objective

The purpose of this policy is to ensure that Confined Space Group Ltd and its supply chain remain free from modern slavery, servitude, forced or compulsory labour, and human trafficking. The company is committed to full compliance with the **Modern Slavery Act 2015**, the **Human Rights Act 1998**, and the **Equality Act 2010**, as reflected in the original document (“Prohibits slavery, servitude, forced or compulsory labour, and human trafficking.”).

2. Scope

This policy applies to:

- All employees
- Contractors and agency workers
- Suppliers and subcontractors
- Self-employed individuals engaged by Confined Space Group Ltd

3. Policy Statement

Confined Space Group Ltd has zero tolerance for modern slavery and human trafficking. We will take proactive steps to ensure that our operations and supply chain are free from exploitation, and we expect the same high standards from all suppliers and partners.

4. Legal Framework

This policy aligns with the following legislation and guidance:

Modern Slavery Act 2015

- Prohibits slavery, servitude, forced or compulsory labour, and human trafficking.
- Requires commercial organisations to publish an annual Modern Slavery Statement where applicable.
- Updated Home Office guidance (2025–2026) emphasises improved transparency, enhanced due diligence, and clearer reporting expectations for organisations.

Human Rights Act 1998

Protects the right to liberty, security, and freedom from slavery and forced labour.

Equality Act 2010

Ensures fair treatment and prohibits discrimination in the workplace.

Home Office Statutory Guidance (Updated February–May 2026)

- Reinforces the need for robust due diligence in supply chains.
- Encourages disclosure of identified incidents and corrective actions.

5. Right to Work & Identity Verification

To reduce the risk of labour exploitation and illegal working, **all individuals joining Confined Space Group Ltd must provide proof of their Right to Work in the UK**, which includes:

- A valid passport, or
- Approved Home Office digital immigration status

This requirement supports compliance with UK Right to Work legislation and helps prevent the use of trafficked or coerced labour.

6. Responsibilities

Management

- Ensure compliance with this policy and all relevant legislation.
- Conduct regular risk assessments across operations and supply chains.
- Provide training to employees on identifying and reporting modern slavery.
- Ensure due diligence is applied to all suppliers and contractors.
- Maintain secure records of checks, investigations, and supplier assessments.

Employees

- Adhere to this policy at all times.
- Report any suspicion or evidence of modern slavery or human trafficking.
- Participate in mandatory training and awareness programmes.

Suppliers & Contractors

- Must comply with this policy and all relevant legislation.
- Must provide evidence of their own anti-slavery policies and due diligence processes.
- Must cooperate with audits, inspections, and information requests.

7. Risk Assessment & Due Diligence

Confined Space Group Ltd will:

- Conduct regular risk assessments to identify areas vulnerable to exploitation.
- Implement due diligence checks on all suppliers, including:
 - Verification of labour practices
 - Review of recruitment processes
 - Assessment of subcontracting risks
- Require suppliers to confirm compliance with the Modern Slavery Act 2015.
- Take immediate action where risks or incidents are identified.

8. Reporting & Whistleblowing

A confidential reporting mechanism is available for employees, contractors, and suppliers to raise concerns. As stated in the original document, “Establish a confidential reporting mechanism for employees and suppliers to report concerns or suspicions of modern slavery or human trafficking.”

Reports may be made:

- Directly to management
- Through the company’s whistleblowing procedure
- To external authorities (e.g., Police, Home Office, Gangmasters & Labour Abuse Authority)

All reports will be investigated promptly and thoroughly.

9. Training & Awareness

Confined Space Group Ltd will:

- Provide training to employees and associates on identifying signs of modern slavery.
- Ensure managers understand their responsibilities for prevention and reporting.
- Raise awareness among suppliers regarding our zero-tolerance approach.

10. Monitoring & Review

- Compliance with this policy will be monitored through audits, supplier reviews, and internal checks.
- The policy will be reviewed annually or sooner if legislation or guidance changes.
- Findings from audits or incidents will be used to strengthen controls and processes.

11. Non-Compliance

Non-compliance with this policy may result in:

- Disciplinary action
- Termination of employment or contract
- Reporting to law enforcement
- Removal from approved supplier lists

Authorisation

Policy adopted and agreed for Confined Space Group Ltd:

Tony Bowman

Managing Director

Date: 27th May 2026

Signed: *Tony Bowman*