



**Spinnaker** Contract Services Limited  
Personnel Logistics

## Modern Slavery Statement

This statement is made as part of Spinnaker Contract Services Limited's commitment to eliminating the exploitation of people under the Modern Slavery Act 2015. It summarises how Spinnaker Contract Services Limited operates, the policies and processes in place to minimise the possibility of any problems, any risks we have identified and how we monitor them, and how we train our staff.

This statement is published in accordance with section 54 of the Act, and relates to the financial year November 2019 to October 2020. It was approved by Mr Paul J Mulholland on 12<sup>th</sup> November 2019.

Mr Paul J Mulholland  
*Managing Director*

### **1 Our Business**

Spinnaker Contract Services Limited is a Limited company operating in the recruitment sector. We provide introduction services / supply temporary workers in the Construction and Industrial sectors.

Spinnaker Contract Services Limited is an independent business.

#### **1.1 Who we work with**

All of the hirers that we work with, and all of the work-seekers we provide, are known to and identified by our staff. All of the temporary workers we supply are identified by our staff. Some of these work-seekers operate through their own limited companies. We do not supply work-seekers to hiring companies through any intermediaries.

#### **1.2 Other relationships**

As part of our business, we also work with the following organisations:

- Safe Contractor
- CHAS

- PETA
- CSCS/CITB
- the Recruitment and Employment Confederation ([www.rec.uk.com](http://www.rec.uk.com))

## **Our Policies**

Spinnaker Contract Services Limited has a modern slavery policy available at [www.spinnakercontractservices.co.uk](http://www.spinnakercontractservices.co.uk).

In addition, Spinnaker Contract Services Limited has all policies which incorporate ethical standards available for our staff in house and via [www.spinnakercontractservices.co.uk](http://www.spinnakercontractservices.co.uk).

### **1.3 Policy development and review**

Spinnaker Contract Services Limited's policies are established by our Managing Director and our leading decision makers, based on advice from HR professionals, industry best practice and legal advice. We review our policies annually or as needed to adapt to changes.

## **2 Our Processes for Managing Risk**

In order to assess the risk of modern slavery, we use the following processes with our suppliers:

- Stringent order processing regarding the workplace and scope of works
- Our own in house Human Resources due diligence processes and practices negate the possibility of any contravention on the Modern Slavery Act 2015.

After due consideration, we have not identified any significant risks of modern slavery, forced labour, or human trafficking in our supply chain. However, we continue to be alert to the potential for problems.

Additionally, we have taken the following steps to minimise the possibility of any problems:

- We collaborate with our clients in order to improve standards and transparency across our supply chain.
- We work with the Recruitment & Employment Confederation in order to combat the risk of modern slavery and human trafficking.

Our staff are encouraged to bring any concerns they have to the attention of management.

## **3 Our Performance**

As part of monitoring the performance of Spinnaker Contract Services Limited, we track the following general key performance indicators:

- We regularly monitor all clients and suppliers, and ensure all of our staff are trained to spot and report and potential signs of misconduct.

Based on the potential risks we have identified, we have also established the following key performance indicators, which are regularly assessed by our Managing Director and our leading decision makers:

- The percentage of suppliers who sign up to an appropriate code / provide their own modern slavery statements
- The effectiveness of enforcement against suppliers who breach policies
- The amount of time spent on audits, re-audits, spot checks, and related due diligence
- The level of modern slavery awareness training amongst our staff

We benchmark our indicators against industry best-practice, in order to ensure that we do not put undue pressure on our clients & suppliers that might increase the potential for risk

End.