


Title: Anti-Slavery Policy, Statement and Questionnaire	Issued	01/01/2023
Approved: Andrew Thompson Approved: Jon Hurford	Review	
Owning Manager – Joely Clark	Next Review	01/01/2024
		
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1 What is slavery?

1.1 The Modern Slavery Act (MSA) 2015 covers four activities:

Slavery	Exercising powers of ownership over a person
Servitude	The obligation to provide services is imposed by the use of coercion
Forced or compulsory labour	Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily
Human trafficking	Arranging or facilitating the travel of another person with a view to their exploitation

1.2 This policy covers all four activities.

2 How is it relevant to us?

2.1 Modern slavery is a complex and multi-faceted crime and tackling it requires all of us to play a part. At first glance, you may think this whole subject is irrelevant to us, but it's not.

2.2 Our aim as a company is to prevent exploitation and human trafficking and protecting our workforce and reputation.

2.3 The MSA 2015 recognises the important part businesses can and should play in tackling slavery and encourages them to do more.

2.4 With this in mind, we need to pay particularly close attention to:

2.4.1 our supply chain

2.4.2 any outsourced activities, particularly to jurisdictions that may not have adequate safeguards.

2.4.3 cleaning and catering suppliers.

2.4.4 corporate hospitality.

3 Responsibilities

3.1 Cleveland Containers Ltd, our managers and colleagues have responsibilities to ensure our fellow workers are safeguarded, treated fairly and with dignity.

3.2 Everyone must observe this policy and be aware that turning a blind eye is unacceptable and simply not an option.

3.3 The Company

3.3.1 We will:

- (a) maintain clear policies and procedures preventing exploitation and human trafficking and protecting our workforce and reputation.
- (b) check our supply chains (see Supply chains).
- (c) lead by example by making appropriate checks on all employees, recruitment agencies, suppliers, etc to ensure we know who is working for us.
- (d) ensure we have in place an open and transparent grievance process for all staff.
- (e) seek to raise awareness so that our colleagues know what we are doing to promote their welfare.
- (f) make a clear statement setting out the steps we have taken to ensure slavery and human trafficking is not taking place in our supply chains and to demonstrate that we take our responsibilities to our employees and our clients seriously (see Anti-slavery statement).

3.4 Managers

3.4.1 Managers will:

- (a) listen and be approachable to colleagues.
- (b) respond appropriately if they are told something that might indicate a colleague, or any other person is in an exploitative situation.
- (c) remain alert to indicators of slavery (see Identifying slavery).

- (d) raise the awareness of our colleagues, by discussing issues and providing training, so that everyone can spot the signs of trafficking and exploitation and know what to do.
- (e) use their experience and professional judgement to gauge situations.

3.5 Colleagues

3.5.1 We all have responsibilities under this policy. Whatever your role or level of seniority, you must:

- (a) keep your eyes and ears open—if you suspect someone (a colleague or someone in our supply chain) is being controlled or forced by someone else to work or provide services, follow our reporting procedure (see Reporting slavery)
- (b) follow our reporting procedure if a colleague tells you something you think might indicate they are or someone else is being exploited or ill-treated.
- (c) tell us if you think there is more we can do to prevent people from being exploited

4 The risks

4.1 The principal areas of risk we face, related to slavery and human trafficking, include:

4.1.1 *supply chains*

4.2 We manage these risk areas through our procedures set out in this policy and elsewhere.

5 Our procedures

5.1 Anti-slavery statement

5.1.1 We make a clear statement setting out the steps we have taken to ensure slavery and human trafficking is not taking place in our supply chains and to demonstrate that we take our responsibilities to our employees, people working within our supply chain and our clients seriously.

5.1.2 We publish an annual modern slavery statement which can be found on the website.

5.1.3 Our statement

- (a) The provision of sales, hire, servicing, maintenance and repair of shipping containers and the sale and hire of temporary antivandal modular accommodation. Our Containers

are purchased from all over the world, and we choose the most ethical suppliers possible.

- (a) This policy sets out the key risk areas we face and our approach to avoiding and preventing modern slavery.

5.2 Supply chains

- 5.2.1 We thoroughly check supply chains to ensure the potential for slavery and human trafficking is significantly reduced.
- 5.2.2 We tell the companies we do business with that we are not prepared to accept any form of exploitation.
- 5.2.3 All our supplier contracts contain an anti-slavery clause. This clause which flows down through all layers of our supply chain, prohibits suppliers and their employees from engaging in slavery or human trafficking.
- 5.2.4 We ensure we can account for each step of our supply processes—we know who is providing goods and services to us and we have mechanisms and processes in place to check.

5.3 Recruitment

5.3.1 Using agencies

- (a) The Directors follow company policy and only use agreed specified reputable recruitment agencies.
- (b) To ensure the potential for slavery and human trafficking is reduced as far as possible, we thoroughly check recruitment agencies before adding them to our list of approved agencies. This includes:
 - (i) conducting background checks
 - (ii) investigating reputation
 - (iii) ensuring the staff an agency provides have the appropriate paperwork (eg work visas)
 - (iv) ensuring the agency provides assurances that the appropriate checks have been made on the person they are supplying
- (c) We keep agents on the list under regular review.

5.3.2 General recruitment

- (a) We always ensure all staff have a written contract of employment and that they have not had to pay any direct or indirect fees to obtain work.

- (b) We always ensure staff are legally able to work in the UK.
- (c) We check the names and addresses of our staff (a number of people listing the same address may indicate high shared occupancy, often a factor for those being exploited).
- (d) We provide information to all new recruits on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.

5.4 If through our recruitment process, we suspect someone is being exploited, the **directors will** follow our reporting procedures (See Reporting slavery).

6 Identifying slavery

6.1 There is no typical victim and some victims do not understand they have been exploited and are entitled to help and support.

6.2 However, the following key signs could indicate that someone may be a slavery or trafficking victim.

6.2.1 The person is not in possession of their own passport, identification or travel documents.

6.2.2 The person is acting as though they are being instructed or coached by someone else.

6.2.3 They allow others to speak for them when spoken to directly.

6.2.4 They are dropped off and collected from work.

6.2.5 The person is withdrawn, or they appear frightened.

6.2.6 The person does not seem to be able to contact friends or family freely.

6.2.7 The person has limited social interaction or contact with people outside their immediate environment.

6.3 This list is not exhaustive.

6.4 Remember, a person may display a number of the trafficking indicators set out above but they may not necessarily be a victim of slavery or trafficking. Often you will build up a picture of the person's circumstances which may indicate something is not quite right.

6.5 If you have a suspicion, report it.

7 Reporting slavery

7.1 Talking to someone about your concerns may stop someone else from being exploited or abused.

- 7.2 If you think that someone is in immediate danger, dial 999.
- 7.3 Otherwise, you should discuss your concerns with a director who will decide a course of action and provide any further advice.
- 7.4 Not all victims may want to be helped and there may be instances where reporting a suspected trafficking case puts the potential victim at risk, so it is important that in the absence of immediate danger, you discuss your concerns first with a director before taking any further action.

8 Training

- 8.1 We provide specialist training to those staff members who are involved in managing our supply chains.
- 8.2 More general awareness training is provided to all through training sessions.

9 Monitoring our procedures

- 9.1 We will review our Anti-slavery policy regularly, at least annually. We will provide information and/or training on any changes we make.

Modern Slavery Statement 2022

Introduction

It continues to be a priority for Cleveland Containers Ltd (CCL) to ensure that we trade ethically, source responsibly and work to prevent modern slavery and human trafficking through our organisation and in our supply chain.

This statement has been prepared by Cleveland Containers Ltd (CCL) in respect of its financial year beginning 1st March 2023 to 28th February 2024. The statement sets the new and ongoing steps we are taking to address and prevent modern slavery within our business and our supply chains.

We recognise that modern slavery is a significant global human rights issue. It continues to be a priority for the Company to ensure that we trade ethically, source responsibly and work to prevent modern slavery and human trafficking throughout our organisation and in our supply chain.

Structure of Organisation

The Company is a limited company, incorporated in England and Wales. We are a provider of shipping containers to all sectors across the United Kingdom. We have over 73 employees in the United Kingdom.

Our Business

Our business is organised into the following business departments:

1. Accounts
2. Sales
3. Hire
4. Marketing
5. Warehouse/Depot
6. Operations
7. SHEQ
8. HR

Our Supply Chains

Our supply chains include transport companies, suppliers of containers, supplies for the depot such as paint, LOLER equipment, and office related equipment.

Our Policies on Slavery and Human Trafficking

We are committed to building a stronger, fairer, more ethical, and better working world.

We have appropriate policies in place that underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We continuously review and update all our policies.

Our anti-slavery 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.

Due Diligence Processes for Slavery and Human Trafficking

We understand that the following areas give rise to the highest modern slavery risks:

- Sourcing of containers.

We continue to review, develop systems and processes to manage supply chains with a view to assessing and managing modern slavery risks.

This includes the development and implementation of an agreed purchasing process utilised by our staff to request goods and services, which includes carrying out a stringent due diligence process on our suppliers. This process ensures orders for goods and services are placed with compliant suppliers and provide the opportunity to develop closer relationships with key suppliers and influence downstream supply chain processes.

We remain focused on assessing our high risk spend areas and on raising awareness across all staff to ensure all products and services are sourced and supplied responsibly and ethically.

As part of our initiative to identify and mitigate risk we also have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

We have zero tolerance to 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 our staff.

We ensure that we provide those staff responsible for procurement with training to recognise the key issues and risks and how these must be addressed.

To detect any modern slavery in our business or supply chains, any concerns to be reported without delay or fear of detrimental treatment. Our modern slavery policy requires anyone who becomes aware of or suspects modern slavery in our business or supply chains to report it to a director or, if they wish to report anonymously, they may do so in line with the whistleblowing policy.

Our Effectiveness in Combatting Slavery and Human Trafficking

We risk assess our suppliers, based on country and nature of product sold. Any suppliers presented as a significant risk of modern slavery are subject to additional due diligence checks, which is in the main based on checking their own modern slavery and human trafficking statements and other published information.

In circumstances where a supplier is still assessed as presenting a risk of modern slavery, they are required to complete a modern slavery questionnaire. The quality and transparency of responses to these questionnaires is assessed and then, subject to the responses contained in the questionnaire, the Company decides whether to enter a relationship with the supplier.

To date we have had no reports of modern slavery within our organisation nor in our supply chains.

Further steps

We will continue to make efforts to identify any significant risks in our business and supply chains and take any action appropriate or necessary directly with suppliers.

Modern Slavery and Human Trafficking Due Diligence Questionnaire

1. Purpose of the information request

- 1.1 The purpose of this information request is to help with our due diligence to assess the risk of slavery and human trafficking in our supply chains. Complete answers to this questionnaire will help us to identify and assess the risk of modern slavery and human trafficking in our supply chains.
- 1.2 When supplying copies of documents and other requested information, please comply with the following guidelines:
- (a) provide the appropriate documents or information, or an appropriate negative statement, as soon as is practicable.
 - (b) where you are uncertain of the scope of any question, or the relevance of any information or document, please provide too much rather than too little information.
 - (c) where the same information and documents are to be supplied in response to two or more different questions, you need not repeat your response if all appropriate cross-references are made;
 - (d) please update your responses as more information becomes available or if subsequent events make any earlier responses inaccurate; and

To assist in our due diligence review we may hold interviews with the employees, workers, subcontractors and agents].

This is an initial request for information, and we may ask for further information in due course.

[NAME OF ORGANISATION]

[DATE]

Please provide the following information and documents:

Structure

- 1.3 Details of the following information in relation to the business:
- (a) full company name;
 - (b) any business name(s);
 - (c) registered office address;
- 1.4 Details of any sub-contractors regarding the supply of goods and services.

2. Policies

- 2.1 Have you agreed to comply with our Anti-slavery policy? If so, please provide details.
- 2.2 Does your organisation have any written policies and procedures relating to anti-slavery and human trafficking, human rights, ethical trading and/or whistleblowing? If so, please provide copies or links to where these documents can be accessed.
- 2.3 Is there any other document or values statement by the organisation that you wish to bring to our attention? If so, please provide copies or links to where these documents can be accessed.
- 2.4 How frequently are your anti-slavery and human trafficking policies and procedure updated (if any)?
- 2.5 Is your organisation a signatory to or a member of any ethical trading or ethical working conditions initiative, or anti-slavery initiatives or charters? If so, please provide details.

3. Relationships

- 3.1 Who are your direct and indirect suppliers and subcontractors for the supply of goods and services by you to us and in which countries do they primarily operate?
- 3.2 Which relationships are critical for the supply of goods and services by you to us?
- 3.3 Who is responsible for managing these relationships?
- 3.4 How frequently do you review these relationships?
- 3.5 Please provide details of any steps you take to mitigate the risk of modern slavery affecting your supply chains, including any labour-related due diligence you conduct on the above suppliers.

4. Goods and services

- 4.1 Where are raw materials or components for products sourced from?
- 4.2 Are you aware of any raised risk of modern slavery relating to the supply of raw material or products to us? If so, please provide details.
- 4.3 Is any of the work for the provision of services outsourced? If so, please provide details.
- 4.4 Are any services provided using contract workers or seasonal workers? If so, please provide details.

5. Compliance

- 5.1 How is compliance with your anti-slavery and human trafficking policies and procedures monitored?
- 5.2 Is senior management involved in enforcing the anti-slavery and human trafficking policies? What actions follow from a breach of the policy?
- 5.3 Have there been any reports of, or concerns raised regarding modern slavery in your business or supply chains? If so, please provide details.
- 5.4 Is there a mechanism or whistle-blowing policy to encourage concerns about modern slavery to be raised so that they can be investigated?
- 5.5 Has your business or any of your employees, agents or subcontractors who supply goods or services on your behalf, been investigated under the Modern Slavery Act 2015, or any other legislation relating to modern slavery and human trafficking or human rights generally? If so, please provide details.

6. Training

- 6.1 Has any anti-slavery and human trafficking awareness training been provided? If so, how, when and to whom is training provided?
- 6.2 Is tailored or further training is given to higher risk groups, such as your procurement teams?

7. Final question

- 7.1 Are there any other matters that should be brought to our attention considering the aim of this due diligence exercise?



Signed CEO:

Date: 01/01/2023