

Modern Slavery Policy

Modern slavery is an umbrella term that encompasses a wide spectrum of crime, including human trafficking, slavery, servitude, and forced labour. The term refers to situations of exploitation that a person cannot leave due to coercion, use of force, abuse of vulnerability, deception or other means. It is the illegal exploitation of people for personal or commercial gain and is a violation of fundamental human rights.

Definitions

Modern slavery is the term used within the UK to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking and the associated criminal offences are defined within the Modern Slavery Act 2015 (the 'Act').

Human trafficking is where a person arranges, or facilitates, the travel of another person with a view to that person being exploited.

Our Approach

At Bryen & Langley, we have adopted a proactive approach to mitigating modern slavery and all forms of corruption and bribery, directly and indirectly, associated with these criminal acts. While no such abuse is tolerated, an open and transparent approach is required by our staff and our suppliers, to ensure we take steps to identify and tackle any instances of modern slavery in our supply chain.

We believe that everyone has a right to be treated with dignity and respect at all times and under all circumstances. Our Policy is that everyone working for Bryen & Langley, in our offices or on site or elsewhere, is responsible for ensuring we meet the highest ethical standards of integrity, courtesy and mutual respect.

Policy Aims

This policy provides a framework to ensure:

- All members of staff understand and are aware of their responsibilities in relation to modern slavery.
- The development of a strategic approach to identifying and tackling any modern slavery within our supply chain.
- The implementation of robust, transparent and proportionate governance and assurance processes.
- Reporting of instances (or concerns) of modern slavery.

Responsibilities and Accountabilities

Bryen & Langley recognises that it is responsible for promoting ethical business practices and policies that protect workers from being abused or exploited.

The prevention, detection and reporting of modern slavery in any part of our company or its supply chain is the responsibility of all those working for us or on our behalf. Any staff member or supplier must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.

Therefore, this policy applies to all persons working for Bryen & Langley or on our behalf, in any capacity, including employees at all levels, directors, agency workers, suppliers, sub-contractors and specialists.

The Board of Directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. The Managing Director currently has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any related queries, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Sub-Contractor and Supplier Responsibilities

Bryen & Langley requires all organisations with whom it is engaged to ensure that their goods, services, materials and labour-related supply chains:

- Fully comply with the Act.
- Are clear, transparent, accountable and auditable.
- Are free from ethical ambiguities.

Bryen & Langley expects that its sub-contractors and suppliers operate to the highest level of ethical standards and will hold their own suppliers to the same high standards.

All sub-contractors and suppliers must pay their dedicated staff working in London at least the London Living Wage, or the UK Living Wage for dedicated staff working outside London. Paying a Living Wage is a protective mechanism against exploitation as it ensures staff members are paid sufficiently to meet their basic needs.

Bryen & Langley acknowledges that contractors may be at different stages of their journey towards having more ethical supply chains but expects to see them demonstrate continuous improvement in how modern slavery risks are mitigated.

Bryen & Langley require sub-contractors who engage workers through a third party to obtain that third party's agreement to adhere to this policy and demonstrate how they seek to tackle any modern slavery within their supply chain.

Consistent with this approach, Bryen & Langley may require employment and recruitment agencies, and other third parties supplying workers to teams in either Administration, to demonstrate their compliance with this policy.

Awareness and Training

Bryen & Langley will raise awareness of this policy by notifying contractors, suppliers and other organisations with which we regularly engage.

The policy will be published on our website at www.bryen-langley.com.

Bryen & Langley will look for opportunities to raise awareness of modern slavery and human rights abuses throughout the Construction community. Appropriate training and guidance will be provided for all staff.

Training will include how to identify the risks of modern slavery and ensure that suspected instances are handled correctly.

Supplementary training will be made available for managerial, commercial and procurement staff.

Bryen & Langley will provide modern slavery information, advice and guidance to contractors. Where feasible, we may also extend modern slavery training to contractors (however, contractors will remain responsible under the Act and retain their overall responsibility for providing training internally to their staff).

Bryen & Langley will maintain records of all staff and contractors who have completed modern slavery training

Assurance and Transparency

Bryen & Langley has committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within either the company or in any supply chain.

Bryen & Langley takes a risk-based approach to its procurement, contract management and supply chain management processes in relation to modern slavery and keeps them under continuous review.

As part of ongoing risk assessment and due diligence processes, Bryen & Langley will consider whether circumstances warrant the auditing of contractors to demonstrate their compliance with this policy.

Non-Compliance, Reporting and Victim Support

If any member of Bryen & Langley staff, sub-contractors or suppliers is discovered to have breached this policy, then appropriate action will be taken; this may range from considering the possibility of breaches being remediated, to terminating agreements and reporting to the appropriate authorities.

Individuals who have reasonable suspicion or evidence of modern slavery or non-compliance with the Act must immediately report their concerns to their Line Manager who in turn will pass the concern up the management chain to Director level.

If the incident has a high level of threat or risk of harm, individuals must always refer the case to the emergency services on 999 as a first port of call. Any involvement of children should always be referred into the authorities immediately.

Bryen & Langley will take a victim-centred approach in order to protect any victims of modern slavery from further harm or vulnerability. We will always act on a case-by-case basis, considering individual circumstances. We aim to follow a collaborative approach with our supply chain, only terminating contracts as a last course of action.

Finally, we commit to continuously learning and adapting based on our experiences. We require suppliers to act in accordance with this Policy where supply chain incidents require remediation.

Policy Review

This policy will be reviewed on an annual basis, to establish whether Bryen & Langley's approach continues to follow best practice by:

- Assessing and interpreting any recent or emerging case law and best practice.
- Benchmarking Bryen & Langley's activities against statements and action plans undertaken by similar organisations.
- Re-evaluating the risk of non-compliance as part of our annual risk management and assurance processes.

How to Help

If you would like to raise a concern about a suspicion you have outside of work (at home or in your community):

- Contact the UK Modern Slavery Helpline on 0800 012 1700 or [report it online](#)
- Contact the Victim Support Helpline on 080 8168 9111
- Visit the [Victim Support website](#)

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