**Modern Slavery Act Transparency Statement**

**Organisation structure**

Houlihan & Co. is a construction and civil engineering company, carrying out specialised groundworks and reinforced concrete frames, mainly for residential house developers. We act as Contractors and Principal Contractors. With fluctuating demand for labour and specialist skills, our workforce includes small contractors and individuals working for us, for a short period of time. We only operate in the UK.

**Policies in relation to slavery and human trafficking**

Our Policy in regard to Modern Slavery is attached and we have no tolerance whatever for any of the illegal practices described or any form of human trafficking.

**Due diligence processes**

We have mapped our supply chain and addressed them initially at top management level: to work or continue working for Houlihan, they must commit not to use any form of modern slavery including via third party arrangements. Only 7 of the smallest companies have now not responded though another 5 have asked for help, which we will provide- they must detail their own experience and not just repeat what they want us to hear.

On sites we have 100% compliance with the CSCS which allows matching a photograph, name and NI number to an individual. This can be interrogated at the CITB and we do check validity 100%.

Our site induction includes recording addresses and will be expected to match the card detail. Signs such as multi occupancy or not knowing your own postcode will be challenged. This sits alongside ensuring we have evidence of an individual’s right to work.

**Identifying where there is a risk of slavery and human trafficking taking place**.

It has been easy to identify where the highest risk lies. Previously we have directly employed individuals when their employer has disappeared or failed financially. While not actually modern slavery, the industry has been cursed with casual employment where even worse practices could move in.

We have taken the action to site using the guidance produced by the GLA spotting bad practice and the government guidance on how to respond when bad practices are suspected, while supporting the victims. We believe the action spreading information on site curtails bad practice and prepares potential victims to resist, especially with the GMLAA becoming more involved in construction.

**Measuring effectiveness and performance indicators**

We have no statistics to benchmark against, but have 2 years’ experience to start with. The intention is to increase time spent and coverage in the next year.

**Training about slavery and human trafficking available to staff**

We have used government material and the GLA example and literature to train our site staff. There is presently uncertainty as to whether the GLA will increase its remit to cover construction, and this should change the context to make illegal practices unprofitable.

Information on notice boards is now reinforced with leaflets- in languages as below- on A4 which can be discreetly taken away.

Our OHSEQ staff now includes multi linguists who are prominent on sites and whose accessibility cannot be taken as a sign of whistleblowing.

08.01.2019

**Documents referred to:**

