

Modern Slavery Act Transparency Statement

The main difficulty investigating the possibility existence of modern slavery in our workplaces is having to rely on interviews where questions are answered truthfully. To avoid possible peer pressure hiding abuse, one to one interviews can be conducted in privacy. Truthful answers will only be obtained if there is trust and if a way out of and protection from abuse is offered.

If an individual denies they are being abused there is no certain way of disproving this. We have no resource or right to check beyond the workplace.

There is no database accessible to the Company to check validity of National Insurance numbers or visit addresses or enter premises.

To date we have tried to explain what modern slavery might look like and what resources are available to victims, in as many languages as we have native speakers.

Our supervisors are required to be vigilant for signs of coercion- physical abuse, malnutrition, and to be clearly available and encouraging if someone approaches with problems. And to be discreet.

Our supervisors and OHSEQ staff have language skills to cover all the main languages presently spoken and overcome cultural reticence.

Over the last years and ongoing we require everyone as they start on a site to complete a site induction form with personal details/ an occupational health questionnaire/ details of their qualifications and competence. They are asked to consent and the way we make use of the data is explained. We check for multiple occupancy at one address, unfamiliarity with UK NI numbers. We would expect abused individuals to be briefed to co-operate and hide, not confront.

No-one can refuse completely: induction is a legal requirement before working on site.


All workers on site whatever their exact relationship with the Inland Revenue, whoever their subcontractor, and including our directly employed workforce to show impartiality.

The data is kept in hard copy, securely, on site- this is an extension of the existing site induction to include safe systems of work, risk, facilities and emergency procedures in a context where consultation is taking place and seen to be encouraged.

No-one is allowed to be anonymous or to be answered for, with translation where requested or obviously needed.

Not every issue or concern will be covered or understood at one induction but over time and with repetition we intend the offer of support to be clear and our rejection of labour abuse to be communicated.: there are multiple offers of help at all levels.

Groundworks is up close and personal work where an individual depends on others constantly: the intention is to break through coerced silence and make dialogue first possible and then a protected route to front line responders who can take forward and support abused individuals.

Signed:  Richard Knight, Managing Director Dated: 16.12.2020