

Modern Slavery Act Transparency Statement

On 23/24 March 2020, Houlihan & Co. stopped work on all sites in response to the pandemic.

Only one developer responded by threatening action for breach of contract- this never went any further.

All sites were subsequently closed by developers to allow them to assess whether and how to work safely during the pandemic.

The government Minister responsible for construction stated later that he had never shut the sites and that all construction was considered essential works. While there were clearly elements of work which fall into any essential category- customer care works requested could include emergency drainage works, though most drainage emergencies are for plumbing failures.

Our workforce was furloughed, except for some management functions which could be managed by working from home or with social distancing in an almost empty Head Office. Self employed and agency staff were laid off.

Our first return to work was to form emergency only customer care teams with safe working procedures based in - the developers followed this with their own procedures.

The developers next priority was to finish nearly completed plots ready to sell. We used a formal checklist to ensure a site where we were asked to work had adequate Covid 19 facilities for the limited works proposed and that we could apply our procedures- for example that sites were not flooded with other trades labour. This allowed starting back of limited numbers of direct and contract labour with no need for agency labour.

A period of adapting sites to cope with Covid 19 procedures by the developers and CLC guidelines followed. Sites started back in an orderly fashion as adaptations to defend against C19 were set in place.

What we found was that much of our workforce pre 24.03 was not necessarily available to return to work- C19 infections, family circumstances, workers returning home outside the UK.

As work built up, we reviewed all starters back with a pre start assessment form to be completed by all starters on every site, repeated with transfers between sites. The information gathered was checked for

- multiple occupancy at any one address
- National insurance number and photographic evidence from CSCS, CPCS, NPORS qualifications
- Responses to medical/ health questionnaire including C19 status and inductions
- Failure to provide details

At the same time, the status of agencies- insurances, formal anti- slavery commitments are being updated.

As the pandemic continues, in circumstances where a site is shut or exposure to C19 is reported, the procedure for all at risk is to have a C19 test and unless a negative test result can be shown, no-one is allowed to start back. There has so far been no example of anyone

Houlihan & Co. (Excavations) Limited


OHSEQ Management System

HOULIHAN & CO. (EXCAVATIONS) LTD

Civil Engineering Contractors
Specialists in Road Sewers & Groundworks



being unable to register for a test or leaving rather than submit to a test Or just disappearing.

Signed:  Richard Knight, Managing Director

Dated: 16.12.2020

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Company's slavery and human trafficking statement for the current financial year. Our annual statement appears on our Company website.