



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.

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. 71% have replied supporting us- at least 3 had similar policies in place. Those not replying have been put on notice and our surveying department is requiring explanations.

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. 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.

Measuring effectiveness and performance indicators

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

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. As we presently have no website while it is under construction, a copy of this statement will be provided to anyone who requests one in writing. The copy will be provided within 30 days of the receipt of the request.

Houlihan & Co. (Excavations) Limited

OHSEQ Management System

HOULIHAN & CO. (EXCAVATIONS) LTD

Civil Engineering Contractors
Specialists in Roads Sewers & Groundworks



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.

18.07.2017

Documents referred to:

Labour Exploitation- Spot the Signs Gangmasters and Labour Abuse Authority

How to report Modern Slavery www.gov.uk

National Referral Mechanism Guidance www.gov.uk

Duty of Notice poster

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