



INTRODUCTION

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Stirling Ackroyd's Group of Companies has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain. Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Stirling Ackroyd Group has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

OUR BUSINESS

Stirling Ackroyd Group is a property services group specialising in residential sales, lettings & management, financial services, surveying and property maintenance. The group's interests are UK based only and it is unlikely that any supply chain for goods or services will extend outside of the UK.

DEFINITIONS

The Organisation considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse or the threat of abuse
- being dehumanised, treated as a commodity or being bought or sold as property
- being physically constrained or to have restriction placed on freedom of movement.

POTENTIAL HIGH RISK AREAS

The potential high risk areas identified by the business include:

- Sub-contractor's engaged for the purposes of property maintenance
- Suppliers
- Engagement of agency staff

The vast majority of the businesses' interests are considered low risk as they involve internal operations only.

OUR POLICIES

The business operates a number of internal policies which ensure we are conducting business in an ethical and transparent manner. These include:

1. Recruitment - The business operates a robust recruitment policy, including conducting eligibility to work in the UK checks for all colleagues to safeguard against human trafficking or individuals being forced to work against their will.
2. Agency staff - Agency staff are required to provide their proof of right to work in the UK documentation to the business itself, not just the agency.
3. Subcontractors - Only authorised sub-contractors may be used for the provision of services; these firms are screened and sign up to a contract of service before services are agreed.
4. Suppliers - The company operates an appointed supplier system from which it's materials and services may be purchased. These agreements are reviewed frequently.

TRAINING

Material information regarding the modern slavery act is held by the HR department and available for any staff requiring it. Senior Managers will be appropriately trained and accessible to identify any potential concerns.