



Modern slavery and human trafficking statement

2020

Sir Robert
McALPINE

NUMBER OF SUBCONTRACTORS
WE DID BUSINESS WITH

1400+

NUMBER OF
LIVE PROJECTS

50+

STRATEGIC SUPPLY CHAIN
PARTNERS (TIER 1)

250

TURNOVER

£1bn+

YEARS IN BUSINESS

150+

NUMBER OF EMPLOYEES

2000+



The sectors we operate in

COMMERCIAL



RETAIL



RESIDENTIAL



HEALTHCARE



INFRASTRUCTURE



INDUSTRIAL



ENERGY



DEFENCE



EDUCATION



SPORT & LEISURE





Our commitment

As we wrote in our previous statement, our company values are the guiding principles which underlie the way in which we judge our actions and undertake our work. Core to our business is ensuring that we operate in an honourable and responsible manner in everything we do and deliver a built environment that we can all be proud of. We can only do this by seeking to act with the highest ethical and moral standards.

We firmly believe that these objectives can only be achieved by working to ensure that everyone involved in our projects, whether they be our own employees or contributing through our supply chain, are treated with respect, dignity and humanity. We believe decent work must receive decent pay. We commit to working collaboratively with all our people including those who work with us as part of our supply chain to deliver what we hope will be lasting change within our industry and society.

Modern slavery: to include slavery, servitude and forced or compulsory labour; and human trafficking (as per the Government Guidance Document, ‘Transparency in supply chains etc. A practical guide.’)

Modern slavery and human trafficking statement

The following statement has been published in accordance with the Modern Slavery Act 2015 and it sets out the actions Sir Robert M^cAlpine Limited and its subsidiaries (Sir Robert M^cAlpine) have taken in the previous financial year (Nov 2018–Oct 2019) to address the inherent risk of modern slavery and unethical labour practices within our industry. To ensure we are as open and transparent as possible, we have endeavoured to provide an insight into our strategy for the following year.

We are a leading family-owned building and civil engineering company established since 1869. We design, develop, build and preserve some of Britain's most iconic buildings. The projects we deliver cover a wide spectrum of sectors including, commercial, residential, retail, leisure, health care, education and infrastructure. While we deliver projects predominantly within the UK, the nature of our supply chain is global and therefore we must look beyond the UK when assessing the risk of modern slavery and unethical labour practices.



Supply chain assessment programme

Building on the work we documented in our third statement around a supply chain assessment programme, we have continued to work with a third party to develop and expand this assessment programme. We have now carried out an additional twenty-four assessments of different supply chain partners.

This assessment itself covers a range of topics including:

- Recruitment and selection
- Business integrity and ethics
- Bullying and harassment
- Occupational health
- Wages and benefits
- Working hours
- Freedom of association
- Accommodation and food provision
- Supply chain management

The supply chain partners we have visited to date vary greatly in the type of work that they provide to us. For example, we have visited security companies, concrete subcontractors, demolition subcontractors, cleaning companies, waste contractors and mechanical and electrical subcontractors. The overriding sentiment that we have experienced when engaging with our supply chain on this matter is that of willingness and the increased desire to work with us to tackle the issue of modern slavery.

There are some key learning points that we would like to highlight. The majority of them all relate to the overriding point that construction is an inherently opaque industry in regard to its supply chain. The multiple layers of subcontracting mean that it is all too easy to lose sight of who is actually on our sites and in our supply chain. The 'who' is the most important element and we must work hard to be able to build a transparent and full picture of every person we interact with.

Findings and risk areas

All of the findings below are areas that we know we need to consider further, but they have given us a greater understanding of where our risks and pressure points lie.

Labour is frequently brought onto site through the self-employed route, which we have seen used to circumnavigate the use of minimum wage levels. While this may be legal to the letter of the law, we do not consider it appropriate for anyone on our sites to be employed below that of the national minimum wage.

The extensive use of labour agencies or the outsourcing of labour, but a lack of due diligence process in assessing that supply chain.

People are recruited into our supply chain and enter our sites through numerous on-boarding methods. The majority of the workforce appear to come through the agency route and often through the self-employed route.

There are blurred lines between the role of subcontractors and labour agencies. Subcontractors often use agency labour, but will still see themselves as the employer, despite not being the payment vehicle or the contract of employment / services being with them.

We have seen the use of different types of contracts such as contract of employment and contract of services.

The use of piece rate to pay for works by some trades in our industry. This presents challenges when working to ensure that national minimum wages are paid.

The two items highlighted in bold in the table above are issues that we are paying particular attention to and see as imperative to address immediately.

It has become clear that we need to move further down the supply chain past our tier one subcontractors. The trend we are seeing is that the lack of transparency and potential pinch points are emerging from the tier two point downwards. However, we need to engage first with our direct subcontractors to access these tier two supply chain partners. Collaborative engagement with them, through our tier one subcontractors, will ensure a stronger and more consistent message is sent.

An example of how we intend to increase collaboration and bring our supply chain with us on this journey is to invite our tier one subcontractors to the third party assessments of the labour agencies they may use. This will ensure that we target the correct tier two companies and increase the transparency of the supply chain.

While we have now carried out thirty-six of these assessments with our supply chain partners, we also felt it important that we ourselves went through the process. We did this in September 2019 and while no non-conformances were raised, there were two suggestions for improvement which we are looking to address.

How have we started to address the issues we have seen?

As indicated above some clear findings have emerged from our assessment programme. We decided that we needed to address these immediately and establish with our supply chain the 'baseline' of what we, Sir Robert McAlpine expect of them. We have developed our Labour Code of Conduct which contains twenty-eight clauses stating our expectations and requirements.



The twenty-eight clauses effectively say that whoever they may be, when on an Sir Robert McAlpine site, these are the minimum expectations. The clauses do cover some legal compliance, as we are aware that some elements of recruitment are not being enacted correctly. The code covers a range of topics including: everyone must have an itemised payslip; everyone must have a written contract; everyone must be provided the correct PPE; and right to work checks are carried out correctly.

Over the summer months and into the autumn we have been communicating this code to our strategic supply chain and asking them to sign it to show their adherence and support. When needed we have walked our supply chain through the code, step by step to ensure they understand it and know how to start engaging with their supply chain on it. It is often a simple message but we regularly advise that the first step is to follow what we are doing with them, i.e. sit down with their supply chain, discuss the code and start to get a greater understanding of how their supply chain operates. We will be using site worker engagement surveys (to be discussed later) to ensure the code is being enacted in practice.

Key learnings

We are fully aware that the assessments act as a static audit in time and this can be effective only to an extent. However, currently these assessments are enabling us to build a better picture of our labour supply chain. While we continue to learn from them and see the benefits, we will continue to use them. As discussed later in our statement, we are using site engagement surveys to talk to people on site and we find that both these surveys and the assessments complement each other. Using a range of methods such as this, we are able to further understand the supply chain and address risks.

Whilst there has been an overriding effort to work collaboratively with us from our supply chain, there is still a clear need to educate the industry regarding the threat and real presence of modern slavery and exploitation. We hope that by engaging with our supply chain in the assessment programme we are addressing this, however we realise that there is far more to do. As we have said before, however we develop our programme to tackle this issue, we will ensure that we bring our supply chain partners along with us.

Looking to the year ahead, we will continue to extend the assessment programme and delve into the supply chain below our direct subcontractors and ensure that they have the correct due diligence processes in place. We have committed to carrying out a further forty-eight assessments in 2019–2020. This will include the tier two companies in our supply chain.



Site Worker Engagement Surveys

Working with our key clients, a number of site engagement surveys have been carried out by a third party. These surveys enable us to effectively pinpoint where in the supply chain issues may manifest.

The surveys involve individuals on our sites being asked if they would take part in a short, five-minute questionnaire. Talking to those directly working on our sites enables us to obtain a further, highly valuable insight. The surveys are anonymous, but we do record who the individual works for, so we can effectively identify where any issues lie. The results from the surveys have helped us shape the 2019/2020 assessment programme for our supply chain partners as we have identified labour agencies that we will visit. The outputs of the surveys have also contributed to the twenty-eight clauses that encompass the Labour Code of Conduct.

We have found that the site worker engagement surveys and the supply chain assessment visits work well together. The site worker engagement survey often validates to some extent the supply chain assessment visit and they identify any gaps that the assessment may not cover. The survey can also identify companies where the assessment hasn't been carried out, but perhaps should. We then use the key points from the survey to check against the companies' systems. For example we often find that on projects where the London Living Wage is required, people say they are not being paid it. We can then check payslips to see if this the case.

Findings and risk areas

There is one overarching finding that consistently emerges from the surveys and this is around inadequate right to work checks. This manifests itself in numerous insufficient checks such as; people only provide photocopies of their documents or photographs of the documents via their mobile phone; people provide insufficient documents to prove their right to work such as CSCS cards; and occasionally people state that they have not had to provide any form of right to work document.

Key learnings

Working with the third party who carry out these surveys, we have re-evaluated some of the questions. For example, the survey asks a series of questions around whether the individual knows if the company they work for has a certain policy. While this is important, what we really want to know is whether they know how to raise a concern and if they have one (whether it is on modern slavery, labour exploitation, bribery and corruption and abuse for example), are they comfortable in raising it. Companies often have policies but the key point is that they communicate the detail. And in relation to whistleblowing, people understand where to look or go for assistance.

We have updated the survey to reflect this. We will also carry out a greater number of site worker engagement surveys to validate the impact of our Labour Code of Conduct and whether we are seeing any change across our sites.

We have committed to carrying out site worker engagement surveys on at least 10% of our sites and this has been written as a company target in our new Sustainability Strategy commencing in 2020.

Training and awareness building

Since 2017 we have had a mandatory e-learning module on modern slavery that all Sir Robert M^cAlpine employees should complete. All new starts are required to complete a set of e-learning modules when they start employment with us.

The current completion rate is around 94% and we will work to increase this.

To mark Anti-Slavery Day on 18th October 2019, we decided to use this day and the preceding week as an opportunity to raise awareness of modern slavery. On our internal internet we provided a quote each day from either a Sir Robert M^cAlpine employee, client or supply chain partner on why it is important to tackle modern slavery; accompanied with some useful information such as a link to the recent Panorama programme or BBC radio programme. We wanted to raise people's awareness not just in the construction industry but also as part of our wider lives.

Working with a supply chain partner, we also utilised some awareness material they had developed and replicated their initiative by placing the information on handout cards. The information included key signs to spot slavery and key contact numbers. See below images of the cards. These cards were distributed to our sites and have been made available not only to Sir Robert M^cAlpine staff, but also our supply chain partners and their workers. Thousands of people work on our sites on any given day, and we saw this as a significant opportunity to raise awareness across our industry.

End modern slavery

Sir Robert M^cALPINE

You know what's right and what's not; you make the call... Remember, in doing the right thing never ever step in and put yourself or the victim in further danger. Simply make a call, that's more than enough. Job done.

Ways to report modern slavery and seek assistance

If you see someone in danger
Call the Police 999

If you want to report an instance of modern slavery, call:
National Modern Slavery Helpline 08000 121 700
or report at www.modernslaveryhelpline.org

If you see something which makes you uncomfortable, or is a red flag for you at anytime, call:
Sir Robert M^cAlpine Whistleblowing Helpline
0800 047 4037

Created by our supply chain partner Marshall's

Signs of Modern Slavery

- Physical appearance**
Victims may appear: malnourished and starved; neglected and scruffy; unclean with poor hygiene; acutely tired and exhausted; drugged or drunk; have incorrect clothing or equipment for the job.
- Psychological trauma**
Victims may appear: fearful or scared; anxious or stressed; angry or agitated; withdrawn; traumatised; confused; unable to make themselves understood.
- Isolation**
Victims may appear: withdrawn; unable to communicate effectively; unable to understand you; unable to speak English; have someone else speak on their behalf.
- Poor living conditions**
Victims may appear: to be living at a place of work; to be living in an overcrowded house; to be living in a dilapidated caravan or outbuilding; living in a place with blacked-out windows; have no heating or running water; live somewhere that is clearly not fit to live in.
- Restricted freedom**
Victims may appear: unable to come and go freely; be reluctant to leave their situation; be unable to find or show identity documents such as a passport or bank account details; be in debt to or dependent on someone else; be unwilling to handle money; to be in places where doors are locked on the outside.
- Reluctant to seek help**
Victims may appear: reluctant to talk to you; reluctant to being helped by you or others; reluctant to leave their situation; fearful of you or the authorities; fearful of reprisal from someone else; unable to prove their legal status to be in the UK.
- Unusual travel times**
Victims may appear: to travel at unusual times; travel very early in the morning or late at night; have transportation to and from work provided for them; have to pay for the transport.

Industry collaboration

We continue to be an active member of the Gangmaster and Labour Abuse Authority (GLAA) Construction Protocol. Details of the protocol can be found at:

<https://www.gla.gov.uk/i-am-a/i-use-workers/construction-protocol/>

For us the key component of the protocol is the sharing of knowledge and best practice with our peers that we can use to implement in our business.

We also continue to take part in industry events. While it occurred in November 2019, it is worth mentioning that we took part in one of the panel discussions as part of the ‘Responsible & Ethical Leadership for Global Construction Supply Chains’ conference and provided our perspective and key lessons learnt from what we have found to date. Our final message at the conference was that, for our business and industry, we felt that the most imminent risk is the multiple and arguably unregulated methods that workers are recruited into the industry and ultimately onto our sites. At Sir Robert McAlpine we acknowledge that, as a main contractor, this is a risk that we must take responsibility for and we will work to tackle this.

Looking internally

For the third year running we have been verified under the BRE's Ethical Labour Sourcing Standard (BES 6002) and progressed to level two. Our certification details can be found on the GreenBook Live website at: <http://www.greenbooklive.com/search/scheme.jsp?id=328>.

While we are progressing through the levels, there are still some key focus areas for us to improve on. The spider diagram below shows the details of our current verification.

We have agreed five new objectives with the BRE and these focus on awareness building alongside training and further collaboration with our supply chain.



This is our fourth statement and we hope that those reading it can see a marked improvement in the transparency and work that we are doing to combat modern slavery. While this statement is written to comply with Section 54 of the Modern Slavery Act 2015, we believe that writing in the context of the wider issue of labour exploitation is key to combating modern slavery.

Looking ahead to 2020, we will continue to develop and implement practical initiatives, along with our supply chain partners, that mean our business and industry is increasingly robust and resilient to modern slavery and any form of labour exploitation.

This statement is wholeheartedly supported and approved by the Executive Board.

Signature



Hector McAlpine

Executive Partner

February 2020

Signature



Paul Hamer

Chief Executive

February 2020

Senior Leadership Team



EDWARD M'ALPINE
Chairman & Executive Partner



PAUL HAMER
Chief Executive



HECTOR M'ALPINE
Executive Partner



LEIGHTON MORE
Chief Financial Officer



KAREN BROOKES
Executive Director of
People & Infrastructure



ALISON COX
Executive Director of
Engineering & Technical Services



ANNA BAKER
SSHEQ Director



MARK GIBSON
MD Scotland
& Northern



PETER MUNN
MD Jersey



BEX HODGSON-JONES
Innovation &
Improvement Director



TONY GATES
MD Civils



DYLAN JONES
Chief Information &
Digital Data Officer



GRANT FINDLAY
Work Winning & Business
Development Director



PAUL HEATHER
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Proudly building Britain's future heritage

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