

Excelsior Land Ltd Modern Slavery and Human Trafficking Statement

Introduction

Excelsior Land Ltd (ELL) is committed to trading ethically, with zero tolerance for modern slavery (including human rights violations, child and forced labour or human trafficking in any form), in our own operations and our supply chain. This is ELL's Modern Slavery and Human Trafficking Statement published in compliance with the Modern Slavery Act 2015 (the 'Act').

Responsibility

Katie O'Cearbhaill, on behalf of the Directors of ELL, has responsibility for this statement. This statement will be reviewed annually.

About our business and supply chains

ELL is an SME in the construction industry. Our vision is to be the best in class for our industry by putting customers at the heart of everything we do.

Our principal activities comprise principal contracting for the residential and commercial sector providing high-quality homes and commercial buildings to local communities. All our operations and activities are based in the midlands and south east.

We operate a centralised procurement team that procures 90% of our materials through 60 construction materials agreements. The remaining 10% of materials are procured through our contractors.

Our supply chain is an integral part of our operations, and our success and reputation is linked to their performance and ethics. We ensure our supply chain adhere to the Modern Slavery Act 2015.

Policies and Due-Diligence

Code of Conduct

All of our suppliers and sub-contractors are required to follow our Code of Conduct and Supplier Charter, which are based on the Ethical Trading Initiative Base Code and international labour laws.

We seek to work with companies who share our principles and work according to our policies on health and safety, ethics and environment standards and who are prepared to commit themselves to meeting the requirements of these codes. We are committed to working with suppliers to support necessary improvements, however we will also take action if suppliers and sub-contractors do not meet our standards. ELL reviews compliance by carrying out risk assessments, periodic review meetings and comprehensive audits where there is higher risk.

ELL is committed to ensuring our business policies, procedures, requests and contracts do not place unnecessary demands on a supplier, which may lead them to violate their obligations. This could include late payment, low payment, and high-pressure delivery demands.

Suppliers and sub-contractors are required to maintain their own ethical sourcing policies and apply these standards to their own business, across all of their workers, suppliers and any sub-contractors engaged in their supply chain. They are also required to provide evidence of their own policies and compliance as appropriate and provide the means for workers to report or discuss non-compliances confidentially. We include indirect, temporary and agency contracts, construction materials suppliers and sub-contractors in this requirement.

Assessing the risk of modern slavery

Based on our annual risk assessment, we believe the business has a low overall risk of modern slavery in both our own operations and in our immediate supply chain. However, we are pro-active in ensuring we are making our workforce, sub-contractors and suppliers aware of the potential risks.

We have reviewed our exposure to risk of modern slavery across all aspects of our business and in 2020 focused on the following 3 areas: Direct, temporary and agency employment practices, Sub-contractors and Materials suppliers.

Direct temporary and agency employment practices

All of our direct employees are, as an absolute minimum, paid in accordance with the UK living wage, or London Living Wage. We require all agency providers to be able to satisfy us that staff all have written employment contracts, have not had to pay for the opportunity to work, and are legally able to work within the UK.

In 2021 we will meet with all of the agencies and labour providers on our preferred supplier list to explain these requirements.

Sub-contractors

We have informed all of our sub-contractors of our requirements regarding modern slavery, and continue to provide information on the Act and its requirements. During the year we completed our risk assessment and information gathering from three higher risk sub-contractor trades (security, landscaping and cleaning) about their employment and payment practices.

Materials suppliers

All construction material suppliers have been informed of our requirements in relation to ethical sourcing. Risk assessment criteria are based on where the materials are manufactured and the value of the business conducted with the supplier. In 2021 we will assess all of our material suppliers and produce a tiered system to ensure there are processes in place to protect against modern slavery in all supply chains.

Whistleblowing

Employees, sub-contractors or suppliers who become aware of possible improper, unethical or illegal behaviour are encouraged to raise the matter with their manager or alternatively refer the matter to a confidential and independent telephone number, Barratt Safecall on 0800 915 1571 or barratt@safecall.co.uk, available 24 hours a day, seven days a week. We have had no incidences of whistleblowing regarding modern slavery in the reporting year.

Training and Awareness

We incorporate Modern Slavery training in our annual training sessions for all employees and we have raised awareness on our construction sites and our divisional offices through a poster campaign.

Key Performance Indicators (KPIs)

Performance against the KPIs identified in our first Modern Slavery Statement is set out below. We will review these KPIs annually.

KPI	Performance data
The number of higher risk materials suppliers reviewed for commitment and actions to address modern slavery risks	80%
The number of risk assessments completed of higher risk sub-contractors (security, landscaping, cleaning)	100%
The number of Directors and Function Heads, Contracts Managers, Group Procurement Team and Group Commercial team trained on modern slavery through a tailored e-learning module	100%

In FY 2023/24 we will:

- Continue to ensure that all our employees are trained on the Act, highlighting key signs and indicators that someone may be a victim of modern slavery;
- Continue to monitor construction material supplier base and build a Tier map

This statement is pursuant to section 54 of the Modern Slavery Act and was approved by the Directors:

Print name: Eoin O'Cearbhaill

Print Name: Katie O'Cearbhaill

Signature: 

Signed: 

Position: Owner/Managing Director

Position: Owner/Director

Policy Review Date: 01/10/23