



ANTI SLAVERY POLICY

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INTRODUCTION:

The Modern Slavery Act 2015 is a UK act of Parliament designed to tackle slavery and human trafficking through the consolidation of previous legislation and the introduction of new measures. Specifically it introduces new requirements for organisations in regards to their business and supply chains.

Whilst Westchurch Homes do not meet the criteria as a company legally required to have a policy we have developed the basics of this antislavery policy to demonstrate that we fully uphold the and endorse the antislavery ethos paying particular regard to Modern Slavery Act 2015 and particularly section 54.

At Westchurch Homes we recognise that slavery and human trafficking are significant human rights issues and are committed to taking appropriate and proportionate steps to mitigating the risk of these occurring within our business and our supply chain.

As a Housebuilder business operating within the UK, the key areas of our operation that could be affected by slavery and human trafficking are our directly hired employees, agency workers working on our behalf, subcontractor operatives working on our sites, and the workforce of our supply chain who supply materials to our business. The steps that we take to mitigate risks in relation to each of these areas are as follows:

- Employees
 - We verify that all employees have the right to work in the UK upon commencement of their employment
 - We make all employees aware of their working hours, leave and absence entitlements and other employment benefits via our induction process.
- Subcontractors
 - We ensure their employees have the right to work in the UK
 - We consider sub-contractors' approaches to employee rights and any breaches of human rights related legislation during our selection process
 - We ask all site operatives to provide evidence of their CSCS cards
 - We want all sub-contractors that purchase materials for use on our sites to consider the risk of modern slavery in their supply chain
- Suppliers
 - We are a Construction Company and do procure supply materials for the sites we work on. The materials supplied by them however fall into their own Policy on Modern Day Slavery.

COMPANY ANTISLAVERY POLICY STATEMENT

Westchurch Homes Ltd wholly endorse the moral ethos and legal framework of the Modern Slavery Act 2015 and will fully abide where applicable to our business, its activities and supply chains.

In no way do (insert company name) support, endorse or engage in any forms of slavery, trafficking, compulsory labour, child labour or exploitation nor will we knowingly or willingly engage the services of or work on behalf of those who may be involved.



Definition of Forced or Compulsory Labour

Forced or compulsory labour is defined in international law by the ILO's Forced Labour Convention 29 and Protocol. It involves coercion, either direct threats of violence or more subtle forms of compulsion. The key elements are that work or service is exacted from any person under the menace of any penalty and for which the person has not offered him/her self voluntarily.

Definition of Human Trafficking

An offence of human trafficking requires that a person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult. In addition, the exploitation of the potential victim does not need to have taken place for the offence to be committed. It means that the arranging or facilitating of the movement of the individual was with a view to exploiting them for sexual exploitation or non-sexual exploitation

Definition of Child Labour

Child labour is defined by international standards as children below 12 years working in any economic activities, those aged 12 - 14 engaged in more than light work, and all children engaged in the worst forms of child labour (ILO).

The term "child labour" is often defined as work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. Whether or not particular forms of "work" can be called "child labour" depends on the child's age, the type and hours of work performed, the conditions under which it is performed and the objectives pursued by individual countries.

Children can be particularly vulnerable to exploitation, but child labour will not always constitute modern slavery. It will still be necessary to determine whether, based on the facts of the case, the children in question are being exploited in such a way as to constitute slavery, servitude and forced or compulsory labour or human trafficking. For example, it is possible for children to undertake some 'lightwork' which would not necessarily constitute modern slavery. 'Light work' is defined by article 7 of ILO Convention No. 138.

Children do have particular vulnerabilities which should be considered when determining whether modern slavery is taking place. The Modern Slavery Act 2015 specifically recognises that it is not necessary for a child to have been forced, threatened or deceived into their situation for it to be defined as exploitation.

Westchurch Homes is a northwest based construction company that carries out the construction of new homes.

Westchurch Homes) do subcontract / use the services of subcontractors. All are checked to ensure relevant skills, knowledge, training and experience.

All personnel working for our company are fully employed by Westchurch Homes

Signed:

Position:

Dated: Sept 2022

Review date due Sept 2023