



# **The Clancy Group Ltd**

## **Modern Slavery Statement**

**Statement pursuant to Section 54(1) of the Modern Slavery Act 2015.**

## **Introduction**

The Clancy Group Ltd (Clancy) is a people based business which values and invests in its staff. Our people are the most important asset we have and as such we are committed to making life better for all of our growing families. We are totally committed to protecting our staff and workforce and embrace the legislation pursuant to the Modern Slavery Act 2015.

This document constitutes Clancy's slavery and human trafficking statement for the financial year ended 31 March 2019. It covers the activities of Clancy and its associated companies.

Clancy are an active member of the Home Office Gangmasters and Labour Abuse Authority's 'Construction Industry Protocol'.

## **Our Business**

Clancy are a national construction company directly employing over 2500 staff and operating across the Water, Energy, Multi Utility, Rail and Infrastructure Civils sector. Whilst the company tries to employ staff directly, due to the nature of the industries within which we operate, it is sometimes necessary to utilise subcontractors and other businesses.

Our clients include some of the largest businesses operating within the UK Water and Energy sectors. We operate a Partnership model with clients whereby we integrate our staff within these businesses to provide a seamless service for their customers.

We take reasonable efforts to ensure our staff are properly trained for the activities that they undertake.

The company's annual turnover is in the region of £300 million.

The Clancy Group comprises the following companies:

- The Clancy Group Ltd
- Clancy Docwra Ltd
- Clancy Plant Ltd
- Clancy Developments Ltd

## **Our Supply Chain**

Clancy use a range of companies who supply products used within our construction and maintenance projects and a number of subcontractors who provide services to our business and our clients.

We have a small number of product suppliers, direct or indirect, who manufacture their products in countries classified as high risk on the Global Slavery Index. As such these companies are challenged to ensure the same compliance with the UK modern slavery legislation in so far as possible for a UK based operation. We also ensure that their production facilities operate with consideration to both an ethical and an environmental ethos. These companies are challenged when first obtaining 'Approved supplier' status and subsequently they are audited by our Procurement Department to ensure these standards are maintained throughout their partnership with our business.

All suppliers and subcontractors have to meet our expectations. All are contractually bound with regards to Right to Work legislation, Anti-Bribery legislation and Modern Slavery legislation.

## **Our Code of Conduct**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

Our ethical and sustainable Procurement Policy sets out our standards with respect to buying goods and services; as well as detailing requirements with respect to human rights, child and forced labour and modern slavery and UK Right to Work legislation. This forms part of our contractual relationship with our suppliers and our Whistleblowing Policy promotes the reporting of any concerns.

## **Due Diligence Process**

Detailed due diligence is carried out on those suppliers where there may be a modern slavery risk. Clancy have an established Security and Investigations department with law enforcement experience who will investigate and report regularly to the Gangmasters and Labour Abuse Authority (GLAA) Intelligence network.

## **Risk Assessment**

We are aware that modern slavery risks can arise from all aspects of our business. We have taken steps to ensure our Human Resources department, the Procurement Department and all of our Operational teams are alert to the potential for engaging with businesses whose ethics may not reflect those of the Clancy Group. As such we audit suppliers if there is any reason for suspicion to ensure compliance.

Our staff are encouraged to report any concerns whatsoever to either their managers, the Security team or using the whistleblowing hotline or email should they wish to remain anonymous. This is not just limited to our schedule of works but to any site where we have a presence and are not the primary contractor.

## **Our effectiveness in combating slavery and human trafficking**

As part of our ongoing commitment to combating slavery and human trafficking, the Clancy Group has joined the GLAA Construction Industry protocol. Our Security and investigations team have established contacts with both the GLAA investigations team and the Home Office CITS forum and are currently creating a series of industry workshops to highlight the potential of inadvertently engaging with businesses who are either unaware of the risks or are operating illegally when it comes to modern slavery. In addition, Clancy has a whistleblowing Policy and we encourage our employees to raise any concerns using the confidential facilities and methods provided if they see any conduct or behaviours that they feel are not appropriate.

## **Training**

The primary purpose is to drive modern slavery from our industry. As such a series of presentations and tool box talks are being given to all Clancy staff and subcontractors working on our projects. The training is mandatory and is also included in the induction pack of all new starters with our business.

The Security team keep a register of all notifiable events where liaison with the GLAA has been necessary. The purpose of this allows our company to be able to monitor and evaluate all intelligence and any subsequent lessons to be learnt. This in turn allows training to be continuously updated and maintain its relevancy to current trends.

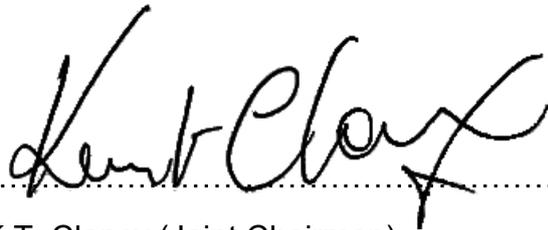
## Approval

This statement has been approved by the Board of The Clancy Group Ltd and is signed on its behalf.

The Clancy Group Ltd are committed to achieving the highest level of ethical standards and to implementing sound governance arrangements to ensure integrity and objectivity in our business activity.

Approved by the Board on the 8<sup>th</sup> August 2019.

Signed.....

A handwritten signature in black ink, appearing to read 'K.T. Clancy', written over a horizontal dotted line.

K.T. Clancy (Joint Chairman)