



Modern slavery and human trafficking statement 2018/2019

An Introduction to Tideway's Statement on modern slavery and human trafficking from the Chief Executive Officer **Andy Mitchell**

According to International Labour Office (ILO) statistics, there has been an alarming increase in human trafficking and modern slavery in recent years. The ILO estimates that, on any given day, there were some 40million people in modern slavery worldwide. This includes forced marriage, forced labour, servitude and human trafficking.

The Modern Slavery Act 2015 sought to put in place certain safeguards to help prevent modern slavery human trafficking and forced labour. Tideway has zero tolerance to all forms of exploitation, whether it be enslavement, people trafficking, racial intolerance, gender or disability inequality. Our **Modern slavery and human trafficking statement** sets out the steps the company is taking to ensure the Project and its supply chain adheres to all relevant legislation and that our employment practices are fair, open and above board.

I am delighted to announce that 2018 saw Tideway Verified to the BRE Ethical Labour Sourcing Standard. As you will see we are only the fourth company to become Verified and the first Client organisation. We will continue to strive for this standard through 2019. Tideway has sought and obtained assurances from our joint venture business partners that the supply chains into the Project are free from such abuses. Our focus during 2019 will be on seeking more assurances and increased vigilance about modern slavery from our joint venture partners, and supply chain.

I fully endorse Tideway's third **Modern slavery and human trafficking statement** which we will continue to review and update on an annual basis.



Andy Mitchell CBE FREng
Chief Executive Officer - Tideway

Modern Slavery and human trafficking statement

2018/2019

Modern Slavery and human trafficking are atrocious forms of organised crime in which people are treated as commodities and exploited for criminal gain. The International Labour Organisation estimate that 40 million people (or three out of every thousand people) worldwide are working in conditions of modern slavery many of whom are trafficked persons. This shocking figure breaks down to includes 25million in forced labour plus 15million in forced marriage.

Tideway are seeking to have a sector-leading approach to modern slavery with appropriate and well communicated corporate policies, a due diligence programme based on supply chain risk assessment and effective follow up with suppliers seen as vulnerable to modern Slavery. Tideway are implementing an appropriate level of employee training and working closely with their key suppliers to mitigate the risk of modern slavery within our supply chain.

The Structure of the Organisation

Bazalgette Tunnel Limited (“BTL”) is the licensed infrastructure provider set up to finance, build, maintain and operate the Thames Tideway Tunnel. BTL trades as and is known to the public as Tideway.

Tideway is owned by a consortium of investors that comprises Allianz, Amber Infrastructure, Dalmore Capital and DIF.

Currently with around 400 employees and contractors, Tideway has its headquarters and operates solely in the United Kingdom. The Thames Tideway project (the Project) is organised into three business units: Tideway West, constructing the tunnel between Acton and Fulham; Tideway Central, constructing the tunnel between Fulham and Blackfriars; and Tideway East, constructing the tunnel between Bermondsey and Stratford.

The construction companies that comprise our supply chain include: Bam Nuttall Ltd, Morgan Sindall PLC, Balfour Beatty Group, Ferrovia Agroman UK Ltd, Laing O’Rourke Construction, Costain Ltd, Vinci Construction Grands Projets and Bachy Soletanche – these are the joint venture consortiums contracted to build the tunnel and are joined by Amey who are providing systems integration services.

Tideway’s Stance on Modern Slavery and Human Trafficking

Tideway is committed to ensuring that there are no instances of Modern Slavery or human trafficking in our supply chains or in any part of our business. Tideway’s anti-slavery stance reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking is not taking place anywhere in the Project. In 2018 Tideway achieved the BRE (Building Research Establishment) Ethical labour Sourcing Standard in accordance with BES 6002 (2017) and received a Statement of verification as evidence of this achievement. The Building Research Establishment (“BRE”) conducted interviews with various departments across Tideway to review the maturity of our ethical supply chain practices, particularly in relation to our Modern Slavery Statement, commitment to paying the London Living Wage and the responsible sourcing of materials. This award is testament to our commitment to operating an ethical and transparent supply chain.

Supplier Adherence to Our Values

Tideway has zero tolerance towards any form of modern slavery and human trafficking. To ensure all those in our supply chain and our third-party contractors adhere to our values we have in place a compliance programme which requires the joint venture consortiums to ensure they are compliant with the Modern Slavery Act 2015 and to provide confirmation of that each year.

We expect our business partners, subcontractors and suppliers to:

- Ensure employees have the freedom to choose to work for them and to end that employment after a mutually agreed notice period.
- Ensure employment is not forced, bonded or non-voluntary prison labour.
- Demonstrate a commitment to equality of opportunity for all individuals free from discrimination and oppression.
- Offer working hours that are not excessive and are compliant with national laws or industry standards.
- Have appropriate disciplinary, grievance and appeal procedures in place.
- Have a confidential whistle-blowing process in place where all reported instances are investigated thoroughly, with assurances given to the victims they may give evidence without fear of conviction for offences committed in connection with their enslavement or trafficking. (A person is not guilty of that offence if compelled to act as a result of enslavement or relevant exploitation.)
- Ensure appropriate health and safety measures are in place to protect the workforce and the wider public.
- Offer wages and benefits at least in line with industry benchmarks or national minimums.
- Commit to the eradication of recruitment fees stating that the costs of recruitment should be borne by the employer and not by any employee

Due Diligence Processes for Modern Slavery and Human Trafficking

As part of our initiative to identify and mitigate risk, we have in place systems to:

- I. Comply with the Ethical Trading initiative. We ask that our suppliers adhere to the ETI base code.
- II. Identify and assess potential risk areas to our supply chains
- III. Mitigate the risk of modern slavery and human trafficking in our supply chains
- IV. Monitor potential risk areas in our supply chains
- V. Protect whistle-blowers with our anonymous hotline
- VI. Tideway and our joint venture consortiums participate in the Action Programme for Responsible and Ethical Sourcing (APRES) and comply with the ILO's Ethical Trading Initiative

Procurement and Risk Assessment Strategy

Our procurement team have developed a Supply Chain Risk Assessment Process for Modern Slavery. As a procurer of numerous goods and services, it is becoming increasingly important that we undertake our own risk assessment of Modern Slavery in our supply chain. Practices that come within the ambit of Modern Slavery are numerous, complex and hidden, and to prioritise activity, Tideway has a strong risk assessment in place. Tideway have a list of current suppliers providing a range of corporate services.

Tideway is required to ask itself if it sources goods or services from industries that have a particular prevalence of modern slavery e.g. clothing and footwear, manufacturing, agriculture, construction, mining, electronics, events/catering and cleaning services work?

To highlight the prevalence of modern slavery practices within our supply chain, Tideway have used a methodology based on the Global Slavery Index (<https://www.globalslaveryindex.org/index>) Whether we take a supplier through to further due diligence on their practices, depends on our risk assessment, based on the answer to 3 questions. These questions are as follows:

1. Using the **Global Slavery Index**:

The Global Slavery Index includes a model of 24 variables which affect vulnerability to enslavement, and cover:

- Political rights and safety
- Financial and health protections
- Protection for the most vulnerable
- Conflict.

Q1a) Does the supplier have a Vulnerability to Modern Slavery score of over 50 out of 100?

YES/NO

2. The second component of the Index is a score of government responses based on an assessment of 98 indicators of good practice, taking into account factors such as whether each country has the necessary laws in place, provides support to victims, and ensures the application of labour standards to vulnerable populations.

3. Does the supplier have a Government Response Rating of CCC or below?

YES/NO

Any supplier with a YES response to Questions 1-3 will be required to provide further information to Tideway in the form of a self-assessment questionnaire and Tideway will then conduct a risk assessment based on the response from the supplier. Having established risk, it is important that we conduct due diligence within our supply chains and operations to understand whether there is evidence of modern slavery issues, and whether there are sufficient controls in place within that organisation.

Tideway have undertaken the risk assessment for all our suppliers and have applied a red RAG status on those suppliers answering a YES to the to one of the three questions. The supplier assessment can be found in Appendix A of this document.

Following the supplier risk assessment, in October 2018 Tideway identified 15 suppliers from which it wished to seek further information to identify whether there was a risk of Modern Slavery occurring within their operations. Following further investigation via a structured questionnaire, no discernible risks of modern slavery were identified and the suppliers were able to satisfy Tideway that there were sufficient processes in place to mitigate such risks. The risk assessment will be repeated on an annual basis

Right to Work

All our employees have a written contract of employment, and their right to work in the UK is established prior to their employment commencing. All employees are made aware of their statutory rights and in-work benefits during their induction process. We work with our joint venture partners and supply chain to ensure that this is the case for all personnel working on the project. Tideway's Onboarding process includes an automated red flag raising system which identifies employees of Tideway, and employees of our Main Works Contractors, who do not have the right work in the UK, who may not be earning the London Living Wage, or whose domestic or travel arrangements appear unusual, and require further investigation.

Policies and Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in the business, and in the supply chains we provide training to our staff during their induction process and annually thereafter. In 2018/2019 all staff have been required to complete training in Modern Slavery and Preventing Bribery in Business – both provided by an external training supplier.

Tideway have the following policies which Tideway staff are required to read and become familiar with during their time on the project:

- Whistle-Blowing Policy – supported by the anonymous Crime Stoppers whistle blowing hotline
- Anti-Fraud, Corruption and Bribery Policy
- Anti-Money Laundering Policy
- Grievance Policy
- Bullying and Harassment Policy

Tideway employees are encouraged to read and understand the relevant policies and procedures, when they join the company and throughout their tenure at Tideway.

Tideway employees are given training in the key ethical and human rights topics which support the above policies. Training sessions are a mixture of online learning, short presentations and drop in sessions usually run by a member of the senior management team. In 2018/2019 this included a specific **Modern Slavery online course**, which was mandatory for all staff. It focusses on the importance of the Modern Slavery Act and how to identify warning signs and anomalies in the workplace, and what to do about them, if identified.

Tideway liaise with their Main Works Contractors to ensure that comparable policies, and employee training is in place. In 2019 we are liaising with our MWCs to ensure that all staff have access to **Modern Slavery** training during the year.

It is our intention going forward to continue to work closely with our partners and supply chain in raising awareness of modern slavery, and in establishing effective mitigation protocols.

Approval

This statement (approved by the BTL Board) is made pursuant to section 54 (i) of the Modern Slavery Act 2015 and constitutes Tideway's Modern Slavery [and Human Trafficking]? Statement for the financial year ending 31 March 2019.

Signed



Andy Mitchell CBE, FREng
Chief Executive Officer, Tideway



Sir Neville Simms FREng
Chairman, Tideway

