



## Modern Slavery and human trafficking statement 2019/2020

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

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.

2019/2020 has seen **new developments** in Tideway's response to the Modern Slavery threat.

- We launched the **Modern Slavery and Ethical Procurement Working Group** at the beginning of 2020
- Tideway became signatories to the Gangmasters and Labour Abuse Authority (GLAA) **Construction Industry Protocol**
- We continue to be featured on the **Modern Slavery Registry**
- We have **sought and obtained assurance from our supply chain**, that their own Modern Slavery programmes are comparable to our ours. Tideway have issued a detailed questionnaire as in previous years, to achieve this and will continue this due diligence on an annual basis.

I fully endorse Tideway's 2019/2020 **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**

**2019/2020**

More than 250 years since the end of the transatlantic slave trade, there are nearly 41million\* people trapped in some form of slavery worldwide today (\*International Labour Organisation 2020). Modern slavery and human trafficking are heinous forms of organised crime in which people are treated as commodities and exploited for criminal gain.

More information can be found here : <https://www.ilo.org/global/topics/forced-labour/lang-en/index.htm>

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

Together with its Programme Manager, Jacobs, Tideway currently has 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 (BMB), constructing the tunnel between Acton and Fulham; Tideway Central (FLO), between Fulham and Blackfriars; and Tideway East (CVB), between Bermondsey and Stratford.

Our supply chain includes joint venture consortiums: Bam Nuttall Ltd, Morgan Sindall PLC, Balfour Beatty Group (BMB), Ferrovial Agroman UK Ltd, Laing O'Rourke Construction (FLO), Costain Ltd, Vinci Construction Grands Projets and Bachy Soletanche (CVB) – together with Amey OWR Ltd 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.

Tideway strive for a sector-leading approach to modern slavery with appropriate and well communicated corporate policies, and a due diligence programme based on supply chain risk assessment. Tideway have implemented training across the organisation and work with key suppliers to mitigate the risk of modern slavery within our supply chain.

BRE Ethical Labour Sourcing

The Ethical Labour Sourcing Standard, BES 6002, enables organisations to demonstrate to customers, partners and other stakeholders, their company's commitment to eliminating any possibility of trafficking or modern slavery in your supply chain. The Ethical Labour Sourcing Standard provides a framework against which companies can examine and assess their own practices.

The Building Research Establishment (BRE) re-verified Tideway to their Ethical Labour Sourcing Standard (ELS) (BES 6002) for a second year. We maintained or improved our level of performance in all categories and achieved the highest level, Level 4, under the Human Resources section. Tideway remains the only Client organisation to be verified to the ELS and members of our supply chain, like Danny Sullivan, VGC Group, Reliable Contractors Ltd, Tarmac and Aggregate Industries, are all verified to the ELS.

More information can be found here :

<https://www.bregroup.com/services/standards/ethical-labour-sourcing-standard/>

### The Modern Slavery Registry

Section 54 of the Modern Slavery Act 2015 requires commercial organisations that operate in the UK and have an annual turnover above £36m to produce a statement setting out the steps they are taking to address and prevent the risk of modern slavery in their operations and supply chains; it is also known as the Transparency in Supply Chains clause (TISC). A number of key stakeholders who were influential in securing the inclusion of the TISC clause also advocated for the Government to create a central registry that would host modern slavery statements. The Government has maintained its position that it will not establish a central registry, however, it does agree that it is a valuable resource. The Modern Slavery Registry provides this resource. Tideway under parent company name Bazalgette Tunnel Ltd, continues to support, and feature on the registry.

### Gangmasters and Labour Abuse Authority (GLAA)

In 2020 Tideway signed the GLAA Construction Protocol. This joint agreement between some of the biggest names in UK construction is aimed at eradicating slavery and labour exploitation in the construction and property industry. The protocol allows signatories to work in partnership to protect vulnerable workers, to share information and to commit to raising awareness in the supply chain.

### Supplier Adherence to our Values

Tideway has zero tolerance towards any form of modern slavery and human trafficking. We have high expectations of our business partners, subcontractors and suppliers and expect them demonstrate a comparable zero tolerance to any form of modern slavery and human trafficking. To this end 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.

### Due Diligence Processes for Modern Slavery and Human Trafficking

As part of our initiative to mitigate the risk of modern slavery and human trafficking in our supply chains, we have in place systems to:

- Identify and assess potential risk areas

- Monitor those potential risk areas
- Protect whistle-blowers with our anonymous hotline

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 (**ETI**). We require that all of our suppliers adhere to the ETI base code.

APRES was set up in 2011 to highlight and promote the ethical sourcing of goods, materials, services and people in the construction and property industry worldwide. It engages a plethora of stakeholders to advance academic research, promote standards and best practice and raise awareness of ethical sourcing.

More information can be found here : <https://www.bregroup.com/wp-content/uploads/2019/08/APRES-White-Paper-2017.pdf>

#### Procurement and Risk Assessment Strategy

Our corporate procurement team have developed a Supply Chain Risk Assessment Process for Modern Slavery. As a procurer of a wide range of 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 protocol in place. Every year a risk assessment is conducted, this will continue on an annual basis.

To assess the potential of modern slavery practices within our supply chain, Tideway have used a methodology based on the Global Slavery Index. For further insight, see <https://www.globalslaveryindex.org>

#### Right to Work

Tideway 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 their 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

Tideway have the following policies which Tideway employees 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.

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. All new starters on the project complete training in Modern Slavery. The online course is mandatory for all new Tideway staff and is supplemented throughout the year with additional short courses, awareness events and talks.

#### Modern Slavery and Ethical Procurement Working Group

At the beginning of 2020 Tideway launched the Modern Slavery and Ethical Procurement Working Group (**MSEPWG**) and held it's inaugural meeting, with participants from across the industry in June 2020.

The MSEPWG is responsible for overseeing and providing strategic support and challenge on the approach by Tideway, our Joint Venture partners (JVs)) and our supply chain on the approach to mitigating risks of unethical labour supply and procurement practices (goods & materials) on Tideway.

The primary aim of the MSEPWG will be to understand how we manage risks and where necessary improve our processes so that the risk of modern slavery and unethical procurement practices are reduced to a very low risk on Tideway.

#### 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<sup>st</sup> March 2020.

#### Signed



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Andy Mitchell CBE, FREng  
Chief Executive Officer, Tideway



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Sir Neville Simms FREng  
Chairman, Tideway