



# Apex Scaffolding Anglia Ltd.

North Quay Works, North Quay Industrial Estate, Lowestoft, Suffolk, NR32 2HF

Telephone:01502 537129 Email: info@apexscaffold.co.uk Web: www.apexscaffold.co.uk

## Social Responsibility (Including Code of Business Ethics and Slavery and Human Trafficking Statement)

### Contents

Statement of Corporate Social Responsibility (CSR) .....	2
Section 1 – Code of Business Ethics .....	2
Section 2 – Occupational Health and Safety.....	4
Section 3 – Employment.....	4
Checking Documents .....	5
Follow-up Checks .....	6
Taking Copies of the documents .....	6
If the Employee Cannot Show Their Documents .....	6
Section 4 – Slavery and Human Trafficking Statement.....	7
Policy Statement.....	7
Commitments .....	8
Modern Slavery and Human Trafficking .....	8
Commitments .....	8
Due Diligence Processes and Checks <sup>4</sup> .....	9
Procurement.....	9
Agency Labour .....	9
Contracts of employment .....	10
Section 5 – Quality Management, Customer and Community Relations .....	14



VAT No: 740910845  
Company Reg No: 3862374  
Registered office: As above



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### **Statement of Corporate Social Responsibility (CSR)**

Apex Scaffolding Anglia Ltd recognise that as a modern, forward thinking business the impacts upon society and the environment that arise through the provision of our undertakings. We take our corporate social responsibilities seriously as a business, contractor, employer and consumer and we are committed to understanding, managing and monitoring our environmental and social impact and we reflect these commitments in our management policies and accompanying manuals, procedures and processes.

We maintain organisational structures, management systems, manuals, procedures, processes and training plans that as a minimum ensure compliance with all relevant laws, regulations and standards. We have controls in place in our IT procedures and processes to ensure adequate levels of data protection for our clients and for our business. The principles encompassed in this policy cover all areas of operations and have been developed to comply with legislation and best practice and will continue to be reviewed and updated to reflect our standards.

Our Policy defines how all Apex Scaffolding Anglia Ltd employees work. We are proud of the ethical business practices that we have established over the last twenty years and will not tolerate any form of corruption, bribery, unfair anti-competitive activities, discrimination or harassment. Instead, we promote ethical business practices, fair treatment of all employees, including diversity and equal opportunities.

Likewise, Occupational Health and Safety is vitally important to us and our goal is to achieve zero work site injuries and we are committed to providing a safe and healthy workplace for our staff and strive to keep our people, our clients' people and the general public safe from harm. Similarly, we seek protect and care for the environment, prevent pollution and strive to reduce our environmental footprint.

### **Section 1 – Code of Business Ethics**

We are committed to ensuring that our business is conducted in all respects according to rigorous ethical, professional and legal standards and in order to further promote ethical and responsible business conduct we have assembled.

This code has been assembled to protect clients, customers, employees and workers from the adverse effect of unethical and illegal behaviour. Apex Scaffolding Anglia Ltd requires all staff at all times to act with honesty, integrity and to promote ethical practices within the areas for which they are responsible. Unethical and illegal practices are an ever-present threat to operations and must be a concern to all members of staff.

This is to be applied in all our business relationships. The code provides all employees of Apex Scaffolding Anglia Ltd and all third parties that represent Apex Scaffolding Anglia Ltd, such as consultants, representatives or third parties (collectively, "Representatives")



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with an important resource to guide them in making the right choices when dealing with matters relating to Business Ethics. In particular, the code addresses those areas in which we must all act in accordance with law or regulation, and also establishes the responsibilities, conditions, guiding principles and procedures to ensure employees and Representatives act appropriately on Apex Scaffolding Anglia Ltd behalf. In addition to adhering to the conditions and procedures set out in the code, employees and Representatives are required to comply with the law.

**Note:** Representatives are required to comply with this Policy unless they have a suitable policy that complies with or exceeds the requirements of this Policy.

Briefly, we will:

- Conduct every aspect of our business with honesty, integrity and openness, respecting human rights and the interests of our employees, customers and third parties;
- Respect the legitimate interests of third parties with whom we have dealings in the course of our business;
- Maintain the highest standards of integrity (e.g. we will not promise more than we can reasonably deliver or make commitments we cannot or do not intend to keep).

This code is a declaration of Apex Scaffolding Anglia Ltd intent of ensuring that Employees and Representatives act and are seen to act with the highest standards of ethical conduct and integrity in everything they do, underpinning the way we act at work, by:

- Ensuring full compliance with all legislation and driving good practice;
- Demonstrating uncompromising honesty and integrity in everything we do;
- Encouraging and ensuring open, transparent, honest and respectful communications;
- Ensuring a safe and healthy working environment free from harm for our people, our clients' people and the general public;
- Ensuring that our operations do not harm the environment and our operations provide sustainable solutions;
- Striving for best practice and innovative ideas in order to deliver the most efficient and effect solution for our clients' projects;
- Valuing, nurturing and developing our inclusive, diverse and talented workforce.

All employees and workers are responsible for their own adherence to the code:

- **Compliance with the law:** We must comply in full with all relevant legislation;
- **Fraud, Theft, Bribery and Malpractice:** We must not engage in any illegal activities or engage in other fraudulent or corrupt business practices including bribery of government officials; and we must comply with the policy regarding Gifts and Hospitality (when being offered, giving or receiving hospitality and gifts).



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- **Conflicts of Interest:** We must avoid situations where personal interests or outside activities could conflict (or potentially conflict) with those of Apex Scaffolding Anglia Ltd.
- **Competition:** We must not act anti-competitively;
- **Community Support and Fundraising Activities:** We must consider local communities in which we operate;
- **Political Contributions:** We must not use funds and resources to contribute to any political campaign, political party, political candidate or similar;
- **Whistle Blowing:** We must inform the MD of any concern about the conduct or any employee or anyone representing Apex Scaffolding Anglia Ltd (and the MD will ensure that no one is penalised for whistle blowing and that the issue is fully investigated).
- **Falsification of Company Books & Records:** We must ensure all staff managing company accounts and records are vetted prior to employment and assessed on a regular basis, in turn facilitating the prevention of tax evasion under Criminal Finances Act 2017.

Fundamentally, the success of our approach depends upon our management, employees and workers understanding Apex Scaffolding Anglia Ltd values, applying judgment and reason in an open environment and having the confidence that Apex Scaffolding Anglia Ltd will help and support them over difficult issues.

Apex Scaffolding Anglia Ltd requires employees and workers to advise their manager, who will inform the Directors, when they become aware of violations of our policies. Unethical and illegal behaviour will not be tolerated and action in all cases up to and including dismissal of employees in breach of the Code and termination of contractual relationships with Representatives.

### Section 2 – Occupational Health and Safety

The health and safety of our people is of the highest priority and cannot be compromised. Our objective is to have a workplace free of incidents and injuries and our Health and Safety Policies, Manuals, Procedures and Processes are part of the drive to continually improve standards. We will investigate all accidents, incidents and near misses and take actions to prevent reoccurrence and will strive for continual improvement.

### Section 3 – Employment



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Apex Scaffolding Anglia Ltd believes that its most important asset is its people; it therefore follows that our employees are the most critical investment that we make and is equally important as commercial success.

Our treatment of our workforce will be just at all times, with no blacklists kept of potential employees or vindictive action taken against employees for accidental damage.

At all times we will seek their active engagement in our plans to make us the most professional and safest organisation possible. We endorse the United Nations Declaration on Human Rights and the International Labour Organisation Declaration on Fundamental Principles and Rights at Work. Full checks will be taken on employees recruited to ensure they are entitled to work in the UK. Legal requirements are followed when employing workers who have the legal ability to work within the UK as specified through the Asylum, Immigration and Nationality Act 2006.

Apex Scaffolding Anglia Ltd will use the Evidence used to validate the employee's identity and eligibility to work by following the following steps and by using the Home Office website. The Home Office will send us a 'Positive Verification Notice' to confirm that the employee has the right to work. And this document will be kept on file.

### Checking Documents

- See the employee's original documents.
- Checking that the documents are valid with the employee present.
- Make and keep copies of the documents and record the date the check is made.

Such documents include:

- Birth Certificates
- Passport
- Identity Cards
- Social Security Numbers
- the documents are genuine, original and unchanged and belong to the person who has given them to you
- the dates for the applicant's right to work in the UK have not expired
- photos are the same across all documents and look like the applicant
- dates of birth are the same across all documents
- the employee has permission to do the type of work you're offering (including any limit on the number of hours they can work)
- for students, see evidence of their study and vacation times
- if 2 documents give different names, the applicant has supporting documents showing why they're different, such as a marriage certificate or divorce decree



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### Follow-up Checks

If the employee's right to work is time-limited, a check their documents again when it's due to expire.

Taking Copies of the documents

When we copy the documents, we will ensure:

- that the copy cannot be changed, for example a photocopy
- the copy is clear enough to read
- for passports, a copy of any page with the expiry date and applicant's details (for example nationality, date of birth and photograph) including endorsements, for example a work visa
- for biometric residence permits and residence cards (biometric format), a copy will be taken both sides
- for all other documents we will take a complete copy
- keep copies during the employee's employment and for 3 years after they stop working for us
- record the date the check was made

If the Employee Cannot Show Their Documents

Apex Scaffolding Anglia Ltd will ask the Home Office to check our employee or potential employee's immigration employment status if one of the following applies:

- We are reasonably satisfied that they cannot show you their documents because of an outstanding appeal, administrative review or application with the Home Office
- they have an Application Registration Card
- they have a Certificate of Application that is less than 6 months old
- they're a Commonwealth citizen who's been living in the UK since before 1988

Our treatment of our workforce will be just at all times, with no blacklists kept of potential employees or vindictive action taken against employees for accidental damage.

We will adhere to the following principles:

- We will treat all of our employees fairly and honestly and all of our staff will have agreed terms and conditions in accordance with legislation and will be given appropriate job skills training to ensure they can do the work to the best of their ability and achieve their potential.
- We will always work in compliance with legislation;
- We will pay a fair wage and we will always meet the national minimum wage;
- Working hours shall not be excessive and shall comply with industry guidelines and national standards; We will not employ any person below the applicable legal age;



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- Take appropriate measures to ensure the health and safety of our workforce, our clients' workforce and the general public;
- Offer wages and benefits that at the very least meet relevant industry benchmarks or national legal standards;
- Where required, we will assess the risk associated with countries with countries with potential ethical issues;
- We will avoid purchasing goods from oppressive regimes and will strive to influence others from purchasing from such countries;
- We will not employ illegal child labour, forced or bonded labour, forced overtime or condone illegal child labour and where we purchase goods or supplies, we will be mindful of the possibility that others could engage in such illegal activity, and therefore we will only purchase through reputable companies.

We do not allow any practice that would restrict free movement of employees;

- Employees have the rights of freedom of association and collective bargaining. We respect the right of our employees to choose whether or not to join a trade union without influence or interference from management;
- Afford employees the freedom to choose to work for us. (Employees should be free to leave their employer after reasonable notice is served. Suppliers should not use forced, bonded or non-voluntary prison labour either in the UK or abroad.);
- We have disciplinary procedures for any member of staff whose conduct falls below the required standard and/or acts illegally;
- We have formal grievance procedures through which staff can raise personal and work-related issues.

### **Section 4 – Slavery and Human Trafficking Statement**

#### **Policy Statement**

This policy has been written in line with the Anti – Slavery Act 2015 and applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, contractors and suppliers.

Apex Scaffolding Anglia Ltd strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation. We expect that our suppliers will hold their own suppliers to the same high standards.



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### Commitments

#### Modern Slavery and Human Trafficking

Modern Slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

#### Commitments

We shall be a company that expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- We have a zero-tolerance approach to modern slavery in our organisation and our supply chains.
- The prevention, detection and reporting of modern slavery in our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
- We are committed to engaging with our suppliers to address the risk of modern slavery in our operations and supply chain.
- We take a risk-based approach to our contracting processes and keep them under review.
- We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using our risk-based approach we will also assess the merits of writing to suppliers requiring them to comply with our Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking.

Consistent with our risk-based approach we may require:

- Employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our Code of Conduct.
- If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships.
- We will continue to review our policy and supply chain processes and will ensure that appropriate and coordinated action is taken to eliminate the opportunity for these offences to be committed in our business and supply chain.
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### Due Diligence Processes and Checks

As required by the **Modern Slavery Act 2015**, this statement will be continually reviewed – with additional measures put in place where required – and reissued annually.

This Statement details the resources available to prevent or identify exploitation including information about the first steps when modern slavery is identified and how and with whom to contact.

All managers will act with due diligence in regard to compliance with this policy.

We will continue to review our policy and supply chain processes and will ensure that appropriate and coordinated action is taken to eliminate the opportunity for these offences to be committed in our business and supply chain.

#### Procurement

Apex Anglia Scaffolding Ltd only purchase through reputable companies and will carry out monitoring where required depending on the severity of risk

The following applies to all:

- Suppliers and Sub-contractors will provide evidence of Modern Slavery Act compliance as part of the Registration and Qualification process.
- All potential Modern Slavery Act breaches by Registered / Qualified Suppliers or Sub-contractors will be reported to the Procurement Team via email/phone and report to the Director
- A copy of the email will be forwarded to the Quality Manager to record the details on the Connect IT Non-conformance Database.
- Investigations will be carried out by the Procurement and Quality Team. The HR Director will be informed of progress at all stages of the investigation.
- Following investigation root cause and corrective action details will be recorded.
- The preventive actions must be implemented to eliminate the risk of recurrence and must be monitored for effectiveness.
- Changes to the Supplier Status resulting from breaches to the Modern Slavery Act will be recorded on the Connect IT Supplier & Subcontractor Database.

#### Agency Labour

Apex Scaffolding Anglia Ltd will avoid using agencies where practicable, preferring to use directly employed personnel. Where agency labour is used, Apex Scaffolding Anglia Ltd will carry out proper background checks, including audits or monitoring where required.

**Note:** The Association of Labour Providers and the Recruitment and Employment Confederation are the two main recruitment industry associations, and working with the Gangmasters Licensing Authority to tackle modern day slavery.



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### **Contracts of employment**

Apex Scaffolding Anglia Ltd check that all staff, including agency workers, have a written contract of employment and that they have not had to pay any direct or indirect fees to obtain work.

#### ***Wages:***

Apex Scaffolding Anglia Ltd will ensure the wages we pay go to the workers. We do not pay cash in hand or have cheque arrangements (as these forms of payment may hide the fact there is exploitation and workers may have been forced into debt and have their bank accounts controlled by exploiters).

Apex Scaffolding Anglia Ltd, Accounts check that they do not pay money into the same bank account for different workers (which may indicate others controlling workers' wages and exploitation).

#### ***Shared occupancy:***

Apex Scaffolding Anglia Ltd checks the names and addresses of those working for us (as a number of people listing the same address may indicate high shared occupancy, often a factor for those being exploited).

#### ***Statutory rights:***

Apex Scaffolding on induction to the company makes sure our workers know their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.

#### ***Assess quotes and fees:***

Apex Scaffolding Anglia Ltd assesses and compares quotations and fees from agencies (and will refuse agencies offering or charging suspiciously low rates).

#### ***Pay:***

Apex Scaffolding Anglia Ltd will be vigilant and ask themselves the following questions:  
Are there a group of workers who have their wages paid into the same bank account? This may be sign of an illegal gangmaster collecting all their wages.

Are they having wages taken off them for accommodation, food or to repay supposed debt?

#### ***Transport:***

Apex Scaffolding Anglia Ltd will be vigilant and ask themselves:

Are a group of workers dropped off or picked up at unusual times of the day, are they all taken to the same property?

#### ***Appearance:***

Apex Scaffolding Anglia Ltd will be vigilant and ask themselves:

Does the person look malnourished, unkempt, or appear withdrawn? Are they suffering physical injuries?

Do they have few personal possessions and often wear the same clothes? Their normal wear may not be suitable for their work.

#### ***Behaviour:***

Apex Scaffolding Anglia Ltd will be vigilant and ask themselves:



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- Is the person withdrawn or appears frightened, unable to answer questions directed at them or speak for themselves and/or an accompanying third party speaks for them?
- If they do speak, are they inconsistent in the information they provide, including basic facts such as the address where they live? Do they appear under the control/influence of others and rarely interact with colleagues?

### **Medical care:**

Apex Scaffolding Anglia Ltd will be vigilant and ask themselves:

- Does the person have old or serious untreated injuries? Have they delayed seeing a healthcare professional?
- Are they vague, reluctant or inconsistent in explaining how the injury occurred?

### **Fear of authorities:**

Apex Scaffolding Anglia Ltd will be vigilant and ask themselves:

Is the person afraid of the authorities (police, immigration, the tax office)? Are they scared of removal or what might happen to their families?

### **Debt bondage:**

Apex Scaffolding Anglia Ltd will be vigilant and ask themselves:

Does the victim perceive themselves to be in debt to someone else or in a situation of dependence?

### **Signs to spot in potential victims:**

Apex Scaffolding Anglia Ltd will be vigilant and check that the person is in possession of their own legal documents (passport, identification and their own bank account details) at induction and these are not being held by someone else – if they are, this suggests exploitation.



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Hazard	Hazardous event	At risk	Initial Risk			Risk Control Measures	Residual Risk			
			L	S	LR		L	S	R	RR
Employing direct staff	Employing trafficked people	PEOPLE TRAFFICKED	2	4	8	<p>As per this policy and the following:</p> <ul style="list-style-type: none"> <li>Maintain good employee retention.</li> <li>Ensure compliance with Company Policies.</li> <li>Train/Brief Managers to ensure they follow the processes.</li> <li>Do not use agency companies to bring installers from other countries.</li> <li>Maintain awareness when recruiting labour.</li> <li>Keep aware throughout the process (check for any suspicious behaviour such as detailed in this policy and do not employ if you have any doubts – and contact the managing Director if you have suspicions.</li> <li>Check references, right to work documents.</li> <li>In particular, check for possible issues such as he/she appears to be: Working against their will; Having movements controlled; Subject to violence, threats; Distrustful of authorities; Unable to communicate freely with others; Unsure of where they are; Not integrated with the local community; Have little or no time off; Live in overcrowded accommodation; Bruises, or unexplained injuries; Subject to security at 'home' or work; No access to their earnings; Work excessive hours; In a situation of dependence.</li> <li>Ensure wages are paid into named accounts (and never several people into one account).</li> </ul>	1	4	4	Low





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Employing agency	Employing trafficked people		3	4	12	As above and including the following:	1	4	4	Low
Using subcontractors and suppliers	Using subcontractors and suppliers who are employing trafficked people	PEOPLE TRAFFICKED	3	5	15	<p>As per this policy, above where applicable, and the following:</p> <p>Require companies to work to their own policy or where not applicable to work in compliance with Apex Scaffolding Anglia Ltd.</p> <p>Use reputable companies only.</p> <p>Ensure all subcontractors/suppliers are made aware of the risk and required control measures.</p> <p>Train/Brief Managers to ensure they follow processes as detailed in this policy.</p> <p><b>Note:</b> if you have suspicions, please contact the authorities immediately.</p>	1	5	5	Low
Likelihood Severity	(L) = Frequent (5) - Probable (4) - Occasional (3) - Improbable (2) - Remote (1)									
Degree of Risk (Dr) = Likelihood X Severity	(S) = Catastrophic (5) - Major (4) – Serious (3) - Minor (2) - Insignificant (1)									

	5	4	3	2	1
5	25	20	15	10	5
4	20	16	12	8	4
3	15	12	9	6	3
2	10	8	6	4	2
1	5	4	3	2	1

Low 1-6 Medium 8-12 High 15-25





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### ***Measuring Effectiveness***

Apex Scaffolding Anglia Ltd, Directors have discussed the effectiveness of our processes and consider them satisfactory but, are not complacent and will continue to assess the risks and the effectiveness of our control measures and to continually update this policy where required.

### ***Training***

To minimise the risks, Apex Scaffolding Anglia Ltd will strive to reduce the risk further by informing every one of the risk of Modern Slavery and Trafficking – from the Directors, Managers, Operatives and our supply chain where required – and to develop the skills and knowledge to understand and support risk prevention and elimination.

### ***Emergency Contact Details:***

Call the modern slavery helpline: 0800 0121 700 or report online:

[www.modernslaveryhelpline.org/report](http://www.modernslaveryhelpline.org/report)

Other helplines: <https://www.modernslaveryhelpline.org/helplines> Call the 101 non-emergency number;

Or if the person is in immediate danger or is under 18 then call 999 as a matter of urgency; Contact Crime stoppers anonymously on **0800 555 111**;

Contact the Salvation Army's 24-hour confidential referral helpline on **0300 3038151**.

## **Section 5 – Quality Management, Customer and Community Relations**

Apex Scaffolding Anglia Ltd are committed to improving the quality of our work and operations and as such are committed to the continued implementation of a Quality Management System.

We are committed to delivering high quality products and services to our customers that meet or exceed their expectations. Our customers and their satisfaction are the most vital parts of our company, and we include their perspective in every decision we make. We will investigate all complaints and take actions to prevent reoccurrence and to improve our customer relationship.

We regard suppliers as our partners and we work with them to help us achieve our policy aspirations in the delivery of our products and services, encouraging them to adopt responsible business policies and practices for mutual benefit.

We strive to be a good corporate citizen, recognising our responsibility to work in partnership with the communities in which we operate.



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We prefer to source suppliers from the local area (without compromising our standards) and actively try to recruit labour and apprentices from the local area (including recruiting labour from the unemployed sector).

Apex Scaffolding Anglia Ltd believes that a responsible approach to developing relationships between the company and the communities we serve, nationally or local, is an essential component of delivering business success. How we interact with the business in which we operate determines our place within it and we recognise that our corporate social responsibilities to our stakeholders are integral to our business. We aim to demonstrate these responsibilities through our actions and our corporate policies, including the promotion of charitable good works.

Apex Scaffolding Anglia Ltd consider each charity and sponsorship request on its merits and regularly donate to charity, such as the local pony club, girls football team and various events supporting cancer research.

Signed: *David Cox*

Date: 1<sup>st</sup> March 2024

David Cox - Managing Director  
Apex Scaffolding Anglia Ltd



VAT No: 740910845  
Company Reg No: 3862374  
Registered office: As above