

The Modern Slavery Act – Risk Assessment

ASSESSMENT DETAILS		POTENTIAL HARM		
RISK	Initial Risk	CONTROLS	TRIGGERS / MEASURES USE TO ASSIST	Final Risk
Non compliance with the Modern Slavery Act 2015	M	<ul style="list-style-type: none"> Production / introduction of MSA Policy Compliance with full requirements of MSA Public statement produced and posted onto the M&S website Compliance with 'other' M&S HR related policies 	<ul style="list-style-type: none"> Interested parties comments re public statement MSA included in M&S annual dashboard Inclusion within reports discussed monthly at both divisional & operational board level 	L
Engaging with a Sub Contractor who does not comply with the Modern Slavery Act 2015	L	<ul style="list-style-type: none"> Requirement to confirm adherence to MSA included in S/C approval process Statement re MSA included in S/C pre acceptance Statement re MSA included in S/C T&C's Statement re MSA included in S/C escalation process Audits undertaken on high risk and Strategic subcontractors 	<ul style="list-style-type: none"> S/C cannot be approved without complying with approval process Monthly review of S/C pre acceptance minutes 'Failing' S/C audited by Group Supply Chain Manager to understand risks and implement corrective actions (as necessary) Examination of Questionnaire responses to identify compliance 	L
Engaging with a Supplier who does not comply with the Modern Slavery Act 2015	L	<ul style="list-style-type: none"> Formal tender process implemented for all key spend categories to ensure full understanding of supplier processes and procedures in relation to MSA Statement re MSA included in Suppliers T&C's Risk-based audits undertaken 	<ul style="list-style-type: none"> Relationship management of all key category suppliers to ensure compliance with Morris & Spottiswood Group policies and the MSA 	L
Allowing employees of Morris & Spottiswood not to comply with the Modern Slavery Act 2015	M	<ul style="list-style-type: none"> Discussion re content of MSA site team requirements Access to all MSA policies and process used in M&S Procedure in place to report 'suspect' instances of MS 	<ul style="list-style-type: none"> Signature page received from all site employees for MSA site team requirements MSA training included within M&S annual dashboard All / any suspect instances dealt with immediately then discussed at both divisional & operational board level 	L

Engaging individuals through agencies who do not comply with MSA	H	<ul style="list-style-type: none"> Formal review and assessment process in place for all agencies engaged Preferred Supplier List of agencies created and communicated through business MS audits undertaken on all PSL agencies every 3 years to review processes Ensure all spend for temporary labour is through approved agencies 	<ul style="list-style-type: none"> HR process/Procurement process to ensure only PSL agencies provide temporary labour Site-based checks on training certificates 	L
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Risk: M = Medium Risk / L = Low Risk