



Kensa Contracting
A KENSA GROUP COMPANY

MODERN SLAVERY & HUMAN TRAFFICKING POLICY STATEMENT

Introduction

Established in 2012, Kensa Contracting Ltd is renowned for our innovative Shared Ground Array heating systems deployed in social housing retrofit, social and private new build housing developments and non-domestic retrofit and new build projects. We have delivered an extensive portfolio of projects across England, Scotland and Wales with offices in Truro, Exeter and Bradford. Our staff are based all over the UK and each site we manage has a dedicated project management team.

Kensa Contracting Ltd complies with all relevant employment law legislation and we expect all our supply chain partners and clients to do the same.

Policy Statement

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and been approved by the board of directors. It sets out the actions we have taken and are continuing to take to ensure no form of modern slavery or human trafficking is present within our business or our supply chain.

We accept our responsibility through due diligence processes to ensure that workers are not being exploited, that they are safe and that relevant employment, health and safety and human rights laws and standards are being adhered to, including freedom of movement and communications.

This policy applies to all individuals working for Kensa Contracting Ltd or on the company's behalf in any capacity, including employees, directors, agency workers, contractors, consultants and business partners.

Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct.

We are fully committed to acting ethically and will terminate our relationship with any supply chain partner if they breach this policy and/or are found to have been involved in modern slavery.

Due Diligence

We recognise that our key risk is our supply chain partners and are mindful that the industry we operate in includes areas of high risk. To mitigate this risk, we operate an approved supplier list and conduct due diligence on all suppliers/contractors/consultants prior to them becoming approved. Our approval procedure includes due diligence of the suppliers professional standing, conformance to the law, compliance with health, safety and environmental standards, qualifications and references. Our approval forms are specific to the disciplines we work with, regularly reviewed and all request signed confirmation of adherence to the Modern Slavery Act.

Our internal recruitment processes are transparent and confirm individuals Right to Work provisions and all employees are paid directly into an appropriate personal bank account.

Training & Awareness

All new starters to the business are required to read and sign adherence to this and other policies. These policies are then resigned at regular intervals or following any significant change.

Further Objectives

This section provides an overview of our objectives in respect to Modern Slavery for the coming year:

All relevant project teams and senior managers will complete an e-learning training module which includes a test at the end, achieving a minimum of 75% to pass. This module and testing will be repeated every two years and will form part of the induction training programme for every new starter, where relevant.

Creation of a reporting procedure so any suspected occurrences of modern slavery or human trafficking are investigated and reported to a relevant authority.

Implementation of supply chain Risk Assessments, where appropriate.

We have already registered with Stronger Together to utilise the resources available to enable us to conduct toolbox talks with contractors and provide onsite signage and information.

Update our supply chain onboarding processes and documentation to include further due diligence.

Other Policies

We operate a suite of internal policies to ensure that we are conducting business in a fair, ethical and transparent manner. These include:

- Anti-Bribery Policy;
- Code of Conduct Policy;
- Equal Opportunity, Dignity and Diversity Policy;
- Whistleblowing Policy.

Signed: 

Date: 3rd April 2023

Mr David Broom, Managing Director,
Kensa Contracting Ltd

Review Date: 29th September 2023

Revision Status			
Revision	Date Issued	Approved by	Signature
1.0	30/07/2019	Managing Director	
1.1	23/10/2020	Managing Director	
1.2	02/11/2021	Managing Director	
2.0	25/04/2022	Managing Director	
3.0	03/04/2023	Managing Director	

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The next review is due: 29/09/2023