

Carlick Contract Furniture Limited: Modern Slavery Statement

If you would like to report a concern about human trafficking within our business or our supply chain you can do so anonymously by clicking [HERE](#)

INTRODUCTION

Carlick Contract Furniture Limited (“**Carlick**” or “**the Company**”) is not required to produce a modern slavery statement under the provisions of the Modern Slavery Act 2015. However, the Company recognises the importance of this new legislation and is pleased to set out its commitment to counteracting modern slavery, which is the fastest growing crime worldwide.

The Company expects that other operators within the sector will be encouraged to join the challenge of eradicating modern slavery and that its influence on its suppliers will also help to achieve this outcome.

The Company also wants to provide reassurance to its customers which seek to buy with confidence from an ethically responsible, modern slavery compliant business.

ABOUT OUR BUSINESS

The Company is a UK manufacturer of contract furniture for leading pub, bar and restaurant groups. It is a medium sized business which is operated and managed from a 100,000 sq ft site located at Junction Eco Park, Swinton, M27 8LR where it employs approximately 120 staff.

Carlick’s supply chain includes in excess of 400 regular suppliers which are primarily based in the UK. A small number of suppliers, however, are located in Central and Eastern Europe.

Carlick has engaged the services of a specialist anti trafficking organisation, (“**SAFE**”), to assist the Company to ensure that it is properly informed and equipped to modern slavery proof its business.

The Company has mapped out its organisational structures to identify employee roles that could be vulnerable to parasitisation by human traffickers. Carlick has included those factors which aggravate these risks such as a reliance on employment agency workers and the nature of the work itself and believes that it now has a realistic understanding of the level of the human trafficking threat to its operations.

OUR POLICIES

- The Company is committed to protecting and supporting its employees and business from the threat of modern slavery;
- Carlick will use its influence to encourage its suppliers to adopt a similarly ethical position;
- The Company will ensure that all new policies are written with the human trafficking threat in mind and will review its existing policies to ensure that they are fit for purpose;
- Carlick will strive to increase its transparency in its policies relating to modern slavery so that clients have confidence in their procurement decisions.

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DUE DILIGENCE

At Carlick Contract Furniture, the executive management team drives the Company's modern slavery priorities. Responsibility for modern slavery issues is held by all senior and middle managers and the single point of contact ("**SPOC**") is maintained by Carlick's H&S manager. The SPOC has enhanced knowledge and understanding of modern slavery issues and threats. This role provides support for the rest of the management team, especially for those who act as gatekeepers for Carlick's organisational modern slavery risk. The Company has also retained the support of SAFE, which has extensive experience in the identification, rescue and prevention of human trafficking. In this way Carlick can readily access specialist advice and support if faced with a specific modern slavery issue.

SAFE has worked with the Company's procurement manager to identify ways in which Carlick can enhance transparency across its supply chain, encourage ethical practice by its suppliers and gather information to provide reassurance that the Company's supply chain threats are being effectively mitigated.

2017-18 MODRN SLAVERY ACTION PLAN

Carlick has mapped its business activities and identified those areas of its operations which have the greatest risk of exposure to modern slavery threat. The Company has also identified factors that aggravate this threat. This enables Carlick to prioritise its efforts at the areas of greatest risk and to ensure that its "gatekeeper" managers are briefed about modern slavery and able to identify the signs.

The Company's policies are being written or gradually updated to make them modern slavery compliant. For example, the Company's recently introduced zero tolerance drugs and alcohol policy. Given that substance abuse can be linked to human trafficking, Carlick recognised this route to dependence in its policy and integrated a modern slavery audit into its drugs testing and training regime. This work is being undertaken with the assistance and support of Carlick's anti trafficking advisors.

Recognising that modern slavery does not wait to get everything in place Carlick has introduced an independent whistleblower mechanism [SAFE Modern Slavery Reporting](#) that encourages employees, customers and suppliers to report concerns relating to modern slavery. For instance, about an employee that might have been trafficked; an individual involved in trafficking another person; or in respect of any of the Company's policies or procedures that do not effectively manage a modern slavery threat. Carlick believe that this process, managed by SAFE, collects and provides evidence which justifies confidence in its modern slavery response and enables all information to be promptly and professionally actioned.

The Company is routinely training and screening all new employees about modern slavery issues and ensuring that they are aware of the function of the SAFE public audit tool.

Carlick has undertaken a high level risk assessment across its supply chain and have been able to identify suppliers with raised levels of risk and these are to be the first recipients of a detailed request for information. The Company has asked its modern slavery advisors to assist with these higher risk suppliers and requests for information have been designed to test threats specific to each of these businesses. The Company actively encourages all the valued suppliers within its supply

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chain to take advantage of the SAFE public audit tool, as this is one of the fastest and most cost effective ways of increasing modern slavery transparency for them and their clients.

Carlick has a rolling programme for requesting information from each of its other suppliers but are proceeding through this process systematically so that the Company can spend additional time with any supplier that requires support in meeting Carlick's expectations for supply chain transparency.

TRAINING

Carlick will continue to train all new employees whilst providing training for workers in higher risk roles. The Company will ensure that all staff receives a modern slavery briefing from their managers and that suitable communications media are prominently displayed on our site.

MEASURING EFFECTIVENESS

The matrices that the Company will use to measure the effectiveness of its mitigation efforts through this first year of protecting its business are set out as follows:

1. Carlick will ensure that it has achieved the objectives outlined in its modern slavery plan.
2. Carlick will receive, interpret and take appropriate action in respect of any reports received through its public audit tool.
3. Carlick will record the numbers of training sessions provided.
4. Carlick will ensure that all staff have been briefed about the risks, made aware of the identity of the gatekeeper managers, the SPOC and about its modern slavery plan.
5. Carlick will record the numbers of internal modern slavery audits and the results of those audits.
6. Carlick will identify the extent to which Carlick have been able to influence the businesses within its supply chain.
7. Carlick will review its progress at the end of the year and will produce a modern slavery statement and action plan for the year 2018-19.