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**Modern Slavery Policy and Human Trafficking Statement**

**November 2019**

**Debbie Mawer, Director of People & Culture**

**Revision History**

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| **Version** | **Date** | **Revision Author** | **Summary of Changes** |
| 1.0 | 2019 | Debbie Mawer | Full Policy - approved |

**Distribution**

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| **Name** | **Title** |
| Debbie Mawer | Director of People & Culture |

**Approval**

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| **Name** | **Position** | **Signature** | **Date** |
| Debbie Mawer | Director of People & Culture |  | November 2019 |

**Review**

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| --- | --- | --- | --- |
| **Review Frequency** | **Next Review Date** | **Review owner** | **Signed off Date** |
| Annually | November 2020 | Debbie Mawer | November 2019 |

**Statement of Intent**

**Candidate Privacy Notice**

The Company trading as Claims Consortium Group (‘the Company’) and its subsidiaries (together ‘the Group’) is a business providing services to Insurance Companies, Insurance Brokers and Policy Holders throughout the UK

At Property Consortium UK Ltd t/a Claims Consortium Group (“the Group”), we are committed to protecting and respecting your privacy.

This policy explains when and why we collect personal information about you, how we use it, and the conditions under which we may disclose it to others and how we keep it secure. If you are a member of Claims Consortium Group Staff, you should refer to the Claims Consortium Group Staff Privacy Policy which is available on intranet.

This policy applies to all candidates directly introducing themselves to Claims Consortium Group as well as those represented by third party agencies that we work alongside.

**Signed: Jeremy Hyams, CEO**

Claims Consortium Group takes its responsibilities in respect of modern slavery and human trafficking seriously. We are committed to playing our small part in eradicating this modern day scourge, which has been described as criminality hidden in plain sight. Government research recently concluded that it costs the UK economy £4 billion annually.

We present our 1st June 2018 – 31st May 2019 statement as required by section 54 of the Modern Slavery Act 2015. The Board of Claims Consortium Group endorsed this report at its meeting on 5th September 2019.

As Chief Executive Officer I am proud to present this public statement of our position. We fully intend this to be a living policy that informs our culture and development and it will be updated regularly. It will always be displayed prominently on our [website](http://www.claimsconsortiumgroup.co.uk/about-us/social-responsibility/).

If you wish to ask anything about the content of this statement, I have provided my contact details below and I will be pleased to hear from you.

We are a claims handling company. We allow Insurance companies to outsource all or some of their claims handling functions to us. Our services include, Third Party Administration, Loss Adjusting, Managed Repairs, Surveyor Validation, Drainage and Water Services Management, Subsidence Management and Third Party Motor Claims Negotiations. We employ over 250 staff and also utilise the services of third party supply chains who carry out activities throughout the UK.

Our customer base is made up of large and small insurance companies throughout the UK.

Our Parent Company is Property Consortium (Holdings) Limited, based in the UK. Other subsidiaries owned by our Parent Company are Property Consortium UK Limited; Property Consortium Drainage Limited; Buildings Claims Services Limited; Claims Consortium Adjusting Limited and Digital Claims Services Limited all of which are based in the UK.

The nature of our activities means that we rely significantly on our supply chain in one area of our business. We rely heavily on the use of freelance surveyors and building contractors. However, all freelance surveyors and sub-contractors are subject to a vigorous due diligence process before they are vetted to ensure that they adopt and adhere to our own employment principles which in turn comply with the Dhaka Principles, thus trying to minimise the risk of modern slavery and human trafficking.

Of course, we are limited in the level of verification we can undertake – particularly in respect of purchased items emanating from secondary sources. This is something we are currently reviewing to ascertain whether there are additional measures we might usefully engage. We will report further in our next annual statement.

During our investigations we have not identified any risks of modern slavery or human trafficking within areas of our organisation or our supply chain. We would therefore describe our overall risk level as low.

We operate a legally compliant, planned approach to procurement and payment. We also ensure that our organisation and its staff observe the provisions of the Bribery Act 2010.

As part of our due diligence with suppliers, we attempt to ascertain that no product/material/service we purchase or labour used has been subject to slavery, exploitation, coercion or human trafficking.

Whilst our ability to verify such assurances is, reasonably limited, where we discover infringements or have reason to disbelieve assurances we have received, we will review our relationship with that supplier.

We also operate due diligence provisions in respect of our own operations. Any area of our activity which carries the risk of modern slavery or human trafficking is subject to a specific risk assessment. We have undertaken 87 risk assessments in the past 12 months, none of which led to the discovery of modern slavery / human trafficking issues.

We acknowledge that seasonal work can present particular risks; especially where migrant labour is used. This is a low risk area for our organisation. We do occasionally rely on seasonal workers during our busy periods. However, we always ensure that everyone we engage has the legal right to work in the UK. Our employee handbook reflects our commitment always to employ people in a legally compliant manner.

We have investigated to find out the percentage of our supply chain’s staff who are employed on temporary or seasonal contracts and the associated risks with suppliers using migrant labour for materials / products / services etc. sourced from known “risk” countries or sectors. We have no suppliers using migrant workers or services.

In terms of our suppliers, we encountered no examples of modern slavery / human trafficking in the past 12 months.

One of the most important ingredients of a successful business is undoubtedly its staff. We have already commented on our commitment to legally compliant terms and conditions of employment. We uphold the highest standards in our human resources policies and practices.

You can view our Equality and Diversity Policy [here](http://intranet.claimsconsortiumgroup.co.uk/departments/peopleandculture/hr/index.asp)

You can view our Recruitment and Selection Policy [here](http://intranet.claimsconsortiumgroup.co.uk/departments/peopleandculture/hr/index.asp)

Our recruitment and promotion policy enshrines a modern slavery and human trafficking guarantee. No member of staff is subject to forced labour or coercion: every member of staff enjoys 100% legally compliant employment.

We provide clear guidance to staff about tackling bribery and corruption. We operate specific provisions through which they can confidentially report any concern or “blow the whistle”. We promote equality and diversity and have adopted measures to deal with any instances of intimidation, bullying or harassment. All members of staff have access to our grievance procedure.

You can view our Bribery provisions [here](http://intranet.claimsconsortiumgroup.co.uk/departments/peopleandculture/hr/index.asp)

You can view our Whistleblowing policy [here](http://intranet.claimsconsortiumgroup.co.uk/departments/peopleandculture/hr/index.asp)

You can view our Bullying and Harassment policy [here](http://intranet.claimsconsortiumgroup.co.uk/departments/peopleandculture/hr/index.asp)

 You can view our Grievance procedure [here](http://intranet.claimsconsortiumgroup.co.uk/departments/peopleandculture/hr/index.asp)

For more information on Modern Slavery and what you should do if you suspect that someone is in slavery please see [www.antislavery.org](https://www.antislavery.org/slavery-today/spot-the-signs-of-slavery/)

Provisions such as these not only reflect our commitment to the highest employment standards; they can also play an important supportive role in our opposition to modern slavery and human trafficking.

To ensure a high level of understanding of the risks of modern slavery, we have delivered training to all of our staff within the last 12 months. Our intention is to continue providing such training to all staff on an annual basis. In addition, our suppliers are expected to complete compliance training on an annual basis.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group’s slavery and human trafficking statement for the finance year ending 31st May 2019.

Signed:

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Jeremy Hyams

Chief Executive Officer

HR@claimsconsortiumgroup.co.uk