



Human Rights & Modern Slavery Policy Statement

1. Introduction and Commitment

As one of Northern Ireland's principal utility infrastructure contractors, Morrow Contracts Ltd acknowledges its responsibility to treat all employees, customers, suppliers and business partners in a fair, respectful and dignified manner. We are committed to upholding the fundamental human rights of every individual connected with our business and to preventing modern slavery, human trafficking, and all forms of exploitation in our operations and supply chain.

This policy sets out the standards to which Morrow Contracts operates and the controls we have put in place to ensure that these rights are upheld throughout our organisation. It encompasses our responsibilities in respect of:

- Human rights, labour rights and employment standards
- The prevention of modern slavery and human trafficking
- The health, safety and wellbeing of our employees and supply chain
- The rights of communities impacted by the work we undertake
- The protection of children from abuse, exploitation and harm
- The safeguarding of vulnerable adults

This policy applies to all employees, directors, contractors, labour-only subcontractors and suppliers operating within or on behalf of Morrow Contracts Ltd. We expect every person acting on our behalf to comply with the standards set out in this policy at all times.

2. Human Rights and Employment Standards

We have identified the following principal areas where our operations could potentially impact on human rights, and have put in place the control measures described below to mitigate those risks.

2.1 Labour, Employment and Remuneration

Controls in place

- We do not employ any person below the age of 16 in any part of our business.
- We do not discriminate against any employee on any grounds including, but not limited to, age, sex, race, colour, nationality, ethnic origin, religion or belief, disability, sexual orientation, gender reassignment, marital or civil partnership status, political beliefs, pregnancy or maternity, or trade union activity. We ensure that all employees have equal access to training, development and promotion opportunities.
- Every employee is paid a rate of at least equal to the Real Living Wage in their basic pay. Apprentices and trainees are paid at least the National Minimum Wage or National Living Wage as applicable. A range of additional employment benefits is provided to all staff.

- We comply with all relevant legislation and regulations relating to working standards, including the Working Time Regulations (NI) 1998 and applicable employment law.
- We have robust procedures to ensure that all employees and labour-only subcontractors are eligible to work in the United Kingdom and Northern Ireland before engagement commences.
- We have fair and transparent disciplinary and grievance procedures in place and we do not engage in, nor do we tolerate, any form of mental, physical, sexual or verbal abuse in our workplace.

2.2 Supply Chain and Procurement

Controls in place

- All suppliers, including subcontractors, are subject to vetting and pre-qualification before engagement. This includes a requirement to confirm compliance with all relevant labour-related legislation in the countries in which they operate.
- All suppliers are required to comply with the Modern Slavery Act 2015 and, where applicable, the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015.
- We include contractual provisions in our subcontract and supply chain agreements requiring compliance with this policy and the legislative obligations it references.
- We maintain supply chain audit rights and will exercise these where we have reasonable grounds to suspect non-compliance.

2.3 Community and Environment

Controls in place

- We respect the rights of local communities when undertaking utility works and endeavour to conduct our activities in a considerate manner that is in keeping with the surrounding community.
- Where practicable, we will consult with local communities prior to significant works being undertaken.
- We comply with all applicable environmental, health and safety legislation. We provide a healthy and safe working environment and work diligently to manage and minimise risks to our staff, subcontractors, clients and the public. Morrow Contracts holds ISO 14001 (Environmental Management) and ISO 45001 (Health and Safety Management) certifications.

3. Modern Slavery and Human Trafficking

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Morrow Contracts has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure that modern slavery is not taking place anywhere in our own business or in any of our supply chains.

Controls in place

- We carry out due diligence on all new suppliers and subcontractors before engagement, including assessment of their exposure to modern slavery risk.
- Our procurement team receives training on recognising indicators of modern slavery and forced labour in the supply chain.
- All employees are made aware of the indicators of modern slavery and their obligation to report any concerns immediately to their line manager or the Designated Safeguarding Lead.
- We maintain a confidential reporting channel through which employees, suppliers or third parties can raise concerns about suspected modern slavery without fear of retaliation.
- We comply with our annual reporting obligations under the Modern Slavery Act 2015 (where applicable) and the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015.

- Any suspected instance of modern slavery identified within our operations or supply chain will be reported immediately to the relevant statutory authorities, including the Police Service of Northern Ireland (PSNI) and the National Referral Mechanism (NRM) as appropriate.

4. Child Protection

Morrow Contracts is fully committed to safeguarding and promoting the welfare of children. We recognise that our operations — which include works in public spaces, parks, residential areas and community environments — may bring our employees and contractors into proximity with children. We accept our responsibility to ensure that all individuals working on our behalf are suitable to do so and are aware of their obligations to protect children from harm.

For the purposes of this policy, a child is any person under the age of 18 years.

4.1 Core Principles

Morrow Contracts commits to the following principles in respect of child protection:

- **The welfare and safety of children is paramount and takes precedence over all other considerations.**
- All children have an equal right to protection from harm and abuse, regardless of their background, ethnicity, disability, gender, religion or any other characteristic.
- Abuse or neglect of a child is never acceptable. All concerns about a child's welfare will be taken seriously and acted upon promptly.
- We will not place any employee or contractor in a situation where they are alone with a child unless this is unavoidable in the course of works, in which case the individual must immediately notify their Supervisor and the situation must be documented.

4.2 Controls and Safeguards

Child protection controls in place

- We do not employ any person below the age of 16 in any part of our business. Employees aged 16 or 17 will not be assigned to roles that involve unsupervised contact with children in any setting.
- Where the nature of a contract or works location requires regular or direct contact with children (for example, works within or adjacent to schools, nurseries, play areas or youth facilities), we will carry out enhanced Disclosure and Barring Service (DBS) / AccessNI checks on relevant personnel before they are permitted to work in that environment.
- All employees and contractors are required to complete child protection awareness training as part of their induction and at regular intervals thereafter. This training covers the recognition of signs of abuse, exploitation or trafficking, and the correct reporting procedures.
- A named Designated Safeguarding Lead (DSL) is appointed within Morrow Contracts to whom all child protection concerns must be reported. The DSL is responsible for maintaining records of all concerns raised, taking appropriate action and liaising with statutory authorities as required. The DSL for Morrow Contracts is: [Insert Name and Contact Details].
- Any employee or contractor who has a concern about the welfare or safety of a child must report this immediately to the Designated Safeguarding Lead. Where the DSL is unavailable, concerns must be reported directly to the PSNI (999 in an emergency or 101 for non-emergency) or the relevant Health and Social Care Trust Gateway Team.
- All allegations or concerns will be handled confidentially, with information shared only on a need-to-know basis and in accordance with data protection legislation.
- We will co-operate fully with any investigation by statutory authorities (including the PSNI, Health and Social Care

Trusts or the National Crime Agency) into concerns about child welfare.

- Any employee or contractor found to have abused, exploited, harmed or failed to report a concern about a child, or who is found to have behaved in a way that is inconsistent with this policy, will be subject to disciplinary action up to and including dismissal, and the matter will be reported to the appropriate statutory authorities.
- No person who appears on the AccessNI Barred List (Children's Barred List) will be employed in any role that involves work in a regulated activity in connection with children.
- We will work only with subcontractors and supply chain partners who can demonstrate equivalent child protection standards and controls. This forms part of our supplier pre-qualification process.

4.3 Reporting a Child Protection Concern

Any employee or contractor who suspects that a child is being abused, exploited or is at risk of harm must act immediately. The following reporting pathway applies:

- Step 1: Report the concern immediately to the Designated Safeguarding Lead: [Insert DSL Name and Contact Number].
- Step 2: If the child is in immediate danger, call 999 (PSNI) without delay.
- Step 3: If the child is not in immediate danger but there are welfare concerns, the DSL will contact the relevant Health and Social Care Trust Gateway Team: Belfast: 028 9050 7000 | Northern: 0300 1234 333 | South Eastern: 028 9151 1467 | Southern: 0800 783 7745 | Western: 028 7131 4090.
- Step 4: Do not attempt to investigate the concern yourself or confront the alleged abuser. Preserve any evidence and document what you have observed or been told as accurately as possible.
- Step 5: Maintain confidentiality — share information only with the DSL or statutory authorities, not with colleagues or third parties.

5. Safeguarding of Vulnerable Adults

Morrow Contracts is committed to safeguarding and promoting the welfare of adults who may be at risk of harm. We recognise that our work — in residential areas, on publicly accessible land and in community settings — may bring our employees and contractors into contact with adults who are vulnerable. We take seriously our moral and legal responsibility to protect those individuals from harm, abuse and exploitation.

For the purposes of this policy, a vulnerable adult (also referred to as an adult at risk) is any person aged 18 or over who, due to their personal circumstances, may be less able to protect themselves from harm, abuse or exploitation. This includes individuals who have a mental illness, physical disability, learning disability, age-related frailty, or who are in a situation of dependency.

5.1 Core Principles

Morrow Contracts commits to the following principles in respect of the safeguarding of vulnerable adults:

- **Every adult has the right to live a life free from abuse, neglect and exploitation. This right is not diminished by disability, illness, age or any other characteristic.**
- We will take all concerns about the welfare of a vulnerable adult seriously and will act upon them promptly, proportionately and with sensitivity.
- We will support the individual's right to make their own decisions (autonomy) whilst taking steps to protect them from harm where their capacity to do so may be affected.
- Safeguarding is the responsibility of every employee and contractor, not just those in designated roles.

5.2 Recognising Abuse and Exploitation

Morrow Contracts employees and contractors are trained to recognise the following potential indicators of abuse or exploitation of a vulnerable adult, which may be encountered in the course of our work:

- Physical indicators — unexplained injuries, bruising, signs of restraint or malnourishment.
- Psychological indicators — distress, withdrawal, fearfulness, reluctance to speak freely in the presence of another person, or expressions of hopelessness.
- Financial indicators — signs that a person is being pressured to make financial decisions against their will, or that a third party is controlling their finances and movements.
- Labour exploitation indicators — a person who appears to be working under coercion, who is not in control of their own identity documents, who is living in overcrowded or inadequate accommodation alongside co-workers, or who appears to be working excessive hours for little or no pay.
- Modern slavery indicators — a person who does not appear to be free to leave their current situation, who is fearful of authorities, or whose movements and communications appear to be controlled by a third party.

5.3 Controls and Safeguards

Vulnerable adult safeguarding controls in place

- All employees and contractors are required to complete adult safeguarding awareness training as part of their induction, and at regular intervals thereafter. This training covers the recognition of indicators of abuse, exploitation and modern slavery, and the correct reporting procedures.
- The Designated Safeguarding Lead (DSL) responsible for child protection also holds responsibility for adult safeguarding. The DSL: [Insert Name and Contact Details].
- Any employee or contractor who has a concern about the welfare or safety of a vulnerable adult must report this immediately to the Designated Safeguarding Lead. Where the DSL is unavailable, the concern must be reported directly to the PSNI (999 in an emergency; 101 for non-emergency) or the relevant Health and Social Care Trust Gateway Team.
- All concerns will be handled with sensitivity, confidentiality and respect for the individual's dignity and autonomy. Information will be shared only on a need-to-know basis and in accordance with applicable data protection legislation.
- We will co-operate fully with any investigation by statutory authorities, including the PSNI, Health and Social Care Trusts, the Northern Ireland Adult Safeguarding Partnership (NIASP), or the National Crime Agency.
- Where we identify indicators that a vulnerable adult within our supply chain or workforce may be a victim of labour exploitation or modern slavery, we will refer the matter to the National Referral Mechanism (NRM) without delay.
- Any employee or contractor found to have abused, exploited or neglected a vulnerable adult, or who has failed to report a concern about a vulnerable adult, will be subject to disciplinary action up to and including dismissal, and the matter will be referred to the appropriate statutory authorities.
- We will ensure that our supplier pre-qualification process includes an assessment of the supplier's approach to the safeguarding of vulnerable adults in their workforce and operations.

5.4 Reporting a Vulnerable Adult Safeguarding Concern

Any employee or contractor who suspects that a vulnerable adult is being abused, exploited or is at risk of harm must follow the reporting pathway below:

- Step 1: Report the concern to the Designated Safeguarding Lead: [Insert DSL Name and Contact Number].
- Step 2: If the person is in immediate danger, call 999 (PSNI) without delay.
- Step 3: If the person is not in immediate danger but there are welfare concerns, the DSL will make a referral to the relevant Health and Social Care Trust Adult Safeguarding Team or

Gateway Team: Belfast: 028 9050 7000 | Northern: 0300 1234 333 | South Eastern: 028 9151 1467 | Southern: 0800 783 7745 | Western: 028 7131 4090.

- Step 4: Do not investigate the concern yourself or confront the alleged abuser. Document what you have observed or been told as accurately and promptly as possible.
- Step 5: Where there are indicators of modern slavery or labour exploitation, the DSL will make a referral to the National Referral Mechanism (NRM). The single point of contact for NRM referrals is the Modern Slavery Helpline: 08000 121 700 (24 hours, 7 days a week).

6. Legislative and Regulatory Framework

This policy is informed by and operated in compliance with the following primary legislation and statutory guidance:

Legislation / Guidance	Jurisdiction / Notes
Modern Slavery Act 2015	England, Wales and Scotland — applies to Morrow Contracts Ltd's operations throughout Great Britain
Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015	Northern Ireland — primary legislation governing modern slavery and human trafficking in NI
Human Rights Act 1998	UK — gives effect to the rights and freedoms set out in the European Convention on Human Rights
Children (Northern Ireland) Order 1995	NI — primary legislation governing the welfare and protection of children
Safeguarding Vulnerable Groups (Northern Ireland) Order 2007	NI — governs barring arrangements and regulated activity with children and vulnerable adults
Protection of Children and Vulnerable Adults (Northern Ireland) Order 2003	NI — provides additional safeguarding protections
Adult Safeguarding: Prevention and Protection in Partnership (2015)	NI — regional policy framework for adult safeguarding across Health and Social Care Trusts
AccessNI (Disclosure and Barring) — Disclosure Act (Northern Ireland) 2012	NI — governs criminal record checks and the barred list regime in Northern Ireland
Employment Rights (Northern Ireland) Order 1996 and associated employment legislation	NI — governs employment standards, fair treatment and working conditions
Working Time Regulations (Northern Ireland) 1998	NI — governs maximum working hours and rest periods
Equality Act 2010 (as applicable in NI) and the Equality (NI) Order 1998	NI — governs equality, discrimination and fair treatment in the workplace
UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018	UK — governs the processing and sharing of personal data, including safeguarding referral information
National Referral Mechanism (NRM) — Home Office guidance	UK — the framework for identifying and supporting victims of modern slavery and human trafficking

7. Monitoring and Reporting

Morrow Contracts will use the following formal mechanisms to monitor compliance with this policy and to drive continuous improvement:

- A robust programme of internal audits will check for compliance with the controls contained within this policy across all areas of the business.

- Compliance with this policy will form an integral part of our management review cycle and Board reporting procedures and governance.
- We will openly and willingly participate in any audits or assessments by our clients, supply chain partners or statutory authorities concerning compliance with this policy.
- We will undertake regular benchmarking of our approach to human rights, modern slavery, child protection and vulnerable adult safeguarding against comparable organisations and sector best practice, and will work to improve our controls where any gaps are identified.
- We will willingly participate in any national or sector reporting mechanisms, including the Modern Slavery Act transparency reporting requirements.
- All safeguarding referrals made under this policy will be recorded confidentially by the Designated Safeguarding Lead and reviewed periodically to identify any patterns or systemic issues requiring further action.
- Training completion rates for human rights, modern slavery and safeguarding training will be monitored and reported to senior management on a quarterly basis.

8. Roles and Responsibilities

The following responsibilities apply in respect of this policy:

- The Board of Morrow Contracts Ltd has ultimate accountability for this policy and for the organisation's compliance with its obligations in respect of human rights, modern slavery, child protection and the safeguarding of vulnerable adults.
- The Managing Director is responsible for ensuring that this policy is implemented effectively across the organisation, that adequate resources are allocated to training and controls, and that the policy is reviewed and updated at least annually.
- The Designated Safeguarding Lead (DSL) is responsible for receiving, recording and acting on all safeguarding concerns raised under sections 4 and 5 of this policy, and for maintaining Morrow Contracts' relationships with relevant statutory authorities.
- All line managers are responsible for ensuring that their teams are aware of this policy, have completed the required training, and understand their reporting obligations.
- Every employee, contractor and subcontractor operating on behalf of Morrow Contracts is personally responsible for complying with the standards set out in this policy and for reporting any concerns without delay.

9. Confidential Reporting

Morrow Contracts is committed to ensuring that any person — whether an employee, contractor, subcontractor, customer, member of the public or third party — can raise concerns about breaches of this policy without fear of retaliation, victimisation or detriment.

Concerns may be raised in confidence directly with the Designated Safeguarding Lead, or through the organisation's whistleblowing procedure. Where an individual does not feel able to raise a concern internally, they may report directly to the relevant statutory authority as set out in sections 4 and 5 of this policy, or to the Modern Slavery Helpline (08000 121 700).

All concerns raised under this policy will be taken seriously, investigated appropriately and handled with sensitivity and confidentiality. No person who raises a genuine concern in good faith will suffer any detriment as a result of doing so.

10. Policy Review

This policy will be reviewed by the Managing Director and the Designated Safeguarding Lead at least annually, or sooner in the following circumstances:

- Where there is a change in applicable legislation or statutory guidance
- Following any significant safeguarding incident or near-miss within the organisation
- Where audit findings or benchmarking activity identifies the need for revised controls
- Where the nature or scope of Morrow Contracts' operations changes materially

Revisions to this policy will be communicated to all employees and relevant contractors and will be recorded in the version control table at the beginning of this document.

Signed:

John Morrow

Date:

- 01/04/2026