



Modern Slavery Statement

Scope

This statement has been published in accordance with Section 54 of the UK Modern Slavery Act (2015). It sets out the steps taken by BEAR Scotland Limited (BEAR) to prevent modern slavery and human trafficking within our business and supply chain during year ending 31 December 2021.

BEAR is a leading highways service provider working with Scottish Government (Transport Scotland) with an annual turnover in the region of £200 million. We currently operate in North West, North East and South East Trunk Road Units. We also undertake the maintenance and management of the M80 DBFO and the A92 DBFO contracts.

BEAR has a Code of Conduct and Ethics and the principles of this code are reflected within this statement.

Our Modern Slavery and Human Trafficking Policy continues to be communicated to our employees and our supply chain and is embedded into the way we work.

Our supply chain comprises sub-contractors of all sizes that provide specialist services. Sub-contracted works account for approximately 70% of our turnover with further services being delivered directly by in-house teams, with materials being sourced from external suppliers/manufacturers. Over a year we may contract with around 100 sub-contractors across Scotland. Our supply chain is integral to our operations and our success and reputation is inextricably linked to their performance and ethical standards.

Our overarching supply chain strategy is to build long-term relationships with a consolidated number of high performing sub-contractors and suppliers.

BEAR operates to a company-wide set of policies and procedures that govern the way we engage with our supply chain, in a fair manner, paying promptly and developing relationships with companies that work safely, provide good quality and embrace our ethical standards.

Policies

Our policies explicitly state how we operate as a business and the steps we take to ensure that we are a transparent, accessible and inclusive organisation.

These policies are reviewed regularly and updated to ensure that ongoing opportunities for improvement are identified and acted upon. These policies are available for viewing by all BEAR personnel via our internal policy portal and include:

- Code of Conduct and Ethics
- Community Benefits (Corporate & Social Responsibility)
- Anti-Bribery
- Equality and Diversity
- Recruitment and Selection
- Whistleblowing

Employees must ensure that they read and comply with these policies and understand that the prevention and reporting of modern slavery in any part of the business and supply chain is the responsibility of all those working directly for BEAR and those under its control.

Compliance

BEAR acknowledge that the construction sector can be particularly vulnerable to targeting by those responsible for slavery and trafficking. Construction is labour-intensive, often working to tight commercial margins and works may well be spread across numerous sub-contractors who themselves may on occasion sub-sub-contract. We focus strongly on not only developing robust policies but also enforcing them and educating our direct and sub-contract workforces.

We carry out right to work and pre-employment checks on all employees joining our organisation and this includes the employee being able to provide evidence that they are in possession of their own identification documents and that the bank account details provided belong to the employee and not a third party. Any discrepancies identified are investigated thoroughly and appropriate action taken.

experience that delivers




All sub-contractors and suppliers working for us have to pre-qualify to be approved. Specific questions relating to modern slavery, equality, diversity and inclusion, social values and the Bribery Act must be satisfactorily addressed. This approach is taken for all sub-contractors and suppliers prior to commencing any works.

Our whistleblowing policy applies to all employees of BEAR. Other individuals performing functions in relation to the organisation, such as agency workers and contractors, are also encouraged to use it. This allows safe reporting by any individual of any wrongdoing including human rights abuses either being directly experienced or witnessed. Individuals are encouraged to raise such concerns with their line managers but are free to contact SafeCall, a third-party whistleblowing helpline, should they prefer.

Targets for 2021

- Continued ongoing enhancements to On-Boarding, in particular increasing the level of detail in relation to modern slavery within our pre-qualification process
- Circulating a Compliance communication to the Supply Chain
- Further develop training and guidance information for new employees including Toolbox Talks for all managers involved in recruiting
- Produce a Supplier Code of Conduct
- Produce enhancements to our Supply Chain Policy

Signed: 

Iain Murray, Managing Director

Date: January 2021

