

## MODERN SLAVERY STATEMENT

1<sup>st</sup> April 2024 – 31<sup>st</sup> March 2025

### 1. Introduction

1.1 This statement sets out NY Highways actions to understand all potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our own business or our supply chains. This statement relates to actions and activities during the financial year 1 April 2024 to 31 March 2025.

1.2 As an employer and purchaser of a wide range of goods related to Highway maintenance in the United Kingdom, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking.

1.3 NY Highways are absolutely committed to preventing slavery and human trafficking in our corporate activities and to ensure that our supply chains are also free from slavery and human trafficking in line with Clause 54 of the 2015 Modern Slavery Act and subsequent government guidance and best practice.

### 2. [Modern Slavery Act 2015](#)

### 3. Our organisation's structure, our business and our supply chains

NY Highways was established as a "Teckal" company to provide highway services to North Yorkshire Council (NYC). We provide highway services across North Yorkshire that deliver planned and emergency highways and streetlight repairs, winter maintenance schemes, road and infrastructure construction, owned and client fleet maintenance. We remain vigilant to the risk of slavery and human trafficking and will manage any risks presented.

From an organisational perspective, it is recognised that modern slavery is a crime that is prevalent within the UK, across many industries and as such, it is a risk that NY Highways takes seriously. However, rather than this risk being looked at in isolation, modern slavery is managed alongside a range of other risks that must be dealt with as part of our business activities e.g. implementing responsible procurement, health and safety etc.

There is no typical victim of modern slavery. Victims are men, women and children of all ages, ethnicities and nationalities and cut across the population. However, it is normally more prevalent among the most vulnerable or within minority or socially excluded groups.

The kinds of situations where people could be in forms of modern slavery include forced labour, deception or abuse of vulnerability for the purpose of exploitation may include:

- Men or women held in domestic servitude who never goes out and perhaps shows signs of physical abuse.
- Men or women working in fields e.g. fruit picking and living in caravans or substandard housing.
- Men or women working in small groups on casual manual labour such as block paving and tarmacking.
- Women working in pop-up brothels, often in small residential dwellings that regularly move around.
- Pop-up car washes
- Nail bars

Where people may be subject to sexual or domestic exploitation or abuse, forced to work long hours

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for little or no pay in poor conditions under verbal or physical threats of violence to them or their families or subject to criminal exploitation.

We have determined that there is potential for an area of risk in the groups of men or women hired to work in small groups as manual labour, but we are confident the recruitment and procurement processes we have in place greatly reduce this and we are alert to the potential high risk of slavery or human trafficking.

### 3.1 Our Organisation

We protect our own employees from becoming victims of modern slavery through fair and robust recruitment practice and pay and conditions. We have a single status pay structure with incremental progression through the grades. The basic pay rate will vary between posts but all employees have access to the same ‘benefits’; sick pay, pension, holidays etc. Everyone will be paid an annual salary, divided into 12 equal monthly payments, so they know what to expect, winter and summer, working or on leave.

### 3.2 Our Supply Chains

Procurement is a centralised function, directly responsible for procurement of all contracts worth £100,000 or more. Provided best value can be demonstrated or quotes are sourced, the NY Highways Buying Team and individual departments have the scope to award contracts worth less than £100,000, with support available from North Yorkshire Council’s (NYC) Procurement and Contract Management Service if required.

Contract management is split between the Commercial Team, Buying Team and other service areas. NYC’s Procurement and Contract Management Service provide information, support and resources to support contract management across the organisation. In August 2024, NY Highways launched a Dynamic Purchasing System (DPS) to cover a comprehensive range of highways related services and products, in partnership with Constructionline.

NY Highways currently has an annual turnover in the region of £62 million. The Procurement and Contract Management Service take the lead on tackling modern slavery in our supply chains, although there is recognition that responsibility and effort permeates and extends throughout the organisation, particularly in those areas more susceptible to modern slavery.

Much of our effort to date has focussed on laying the foundations in order to simply and practically build the prevention, identification, and mitigation of modern slavery into all aspects of the procurement and contract management lifecycle. The Procurement and Contract Management Service’s transition to a category management model helps our procurement professionals to develop expertise, supplier relationships and understanding of particular markets. A comprehensive contract management toolkit helps to embed best practice across NY Highways, to ensure that a standard and robust approach is taken to monitor supplier performance. Our procurement and contract procedures can be found [here](#).

We act in full accordance with the Modern Slavery Act 2015 and the requirements under the Public Contract Regulations 2015 but we know that we can and must do more. Over the coming 12 months we will build on these foundations across a number of areas, regularly updating this Statement as progress is made, particularly around our reporting processes.

## 4. Our policies in relation to slavery and human trafficking

We review our policies and procedures to ensure they remain compliant and fit for purpose. The following policies and procedures are considered to be key in meeting the requirements of the Modern Slavery Act 2015.

### 4.1 Recruitment

**For the recruitment of permanent staff we have implemented an outsourced recruitment platform**

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## **with North Yorkshire Council to standardise our approach to recruitment**

They include robust procedures for vetting new employees, which ensures they are able to confirm their identities and qualifications. To comply with the Asylum, Immigration and Nationality Act 2006, all prospective employees supply original documents as evidence of their eligibility to work in the UK, which is verified as original. Where required evidence of valid driving licences and the relevant categories are checked. References are requested directly and we do not accept references provided upfront by a potential employee.

### **4.2 Agency Workers**

For temporary agency staff, a neutral vendor is used. Agencies signed up to this comply with the Modern Slavery Act 2015 and agree to NY Highways terms, conditions and negotiated rates. Agencies submit candidates for a role along with identification documents and references for agency workers; this helps us ensure that the person introduced by the agency is the person completing the assignment and we have transparency in the payment of agencies and agency workers.

### **4.3 Pay**

As part of our SLA with North Yorkshire Council we operate a Job Evaluation Scheme to ensure that all employees are paid fairly and equitably in an agreed pay framework. Equal pay is evaluated and governed by the HR service in partnership with trade unions.

### **4.4 Employee Code of Conduct**

Our Employee Code of Conduct makes clear to employees the actions and behaviours expected of them when representing NY Highways. We strive to maintain the highest standards of employee conduct and ethical behaviour and breaches are investigated and appropriate action taken.

### **4.5 Whistleblowing**

We encourage all our employees, customers and other business partners to report any concerns related to the direct activities or the supply chains of NY Highways.

## **5. Staff Training and Learning:**

Through our parent company, North Yorkshire Council, we have a programme of training and learning available to ensure staff are well equipped to perform well within their roles. Modern Slavery training is available to all staff on the Learning Zone platform, it enables staff to identify and know how to report suspected incidents of abuse and neglect, including modern slavery and trafficking.

## **6. Monitoring and evaluating**

Responsibility for modern slavery compliance rests with the Commercial Team, supported by Procurement and HR, with oversight provided by the NYH Board of Directors.

## **7. Approval**

This statement has been approved in August 2025 and it will be reviewed and updated annually. Published September 2025. This statement will be published on our website and uploaded to the UK Government Modern Slavery Registry.

Jamie Crumlish  
Managing Director  
NY Highways

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