

Modern Slavery & Human Trafficking Statement

Introduction

This Modern Slavery and Human Trafficking Statement relates to actions and activities during the financial year. 1st January 2025 to 31st December 2025.

The statement sets down O'Malley Haulage Limited commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

Organisational Structure

This statement covers the business activities of O'Malley Haulage Limited which are as follows: Waste Management, Recycling & Road Haulage of Waste and Aggregates.

The Company currently operates solely in the UK & has an annual turnover in excess of £40m.

Supply Chains

O'Malley Haulage's supply chains provide:

- Materials such as Recycled & Primary Aggregates.
- Fuel & Oil Deliveries.
- Plant both owned & rented.

They play a major part in supporting our business, we therefore expect a sharing of our values & the same due diligence in the prevention of modern slavery.

High Risk Activities

The following activities are considered to be at high risk of modern slavery or human trafficking: Use of subcontractor's and casual labour.

Responsibility for the Company's anti-slavery initiatives is as follows:

- 1.1 Policies: Michael Kilroy Operations Manager is responsible for creating and reviewing policies. The process by which policies are developed is to review best practice and adapting to the needs of the company.
- 1.2 Risk assessments: Lisa Sweeney Office Manager is responsible for risk assessments in respect of human rights and modern by a process of annual review of risk assessments

Trafficking

As part of our initiative to identify and mitigate risk:

- We run our business with skilled managers to ensure optimum control of the work environment
- Where possible we build long standing relationships with local suppliers and customers and make clear our expectations of business behaviour
- With regards to national or international supply chains, our point contact is preferably with a UK company or branch and we expect these entities to have suitable anti-slavery and human trafficking policies and processes. We expect each entity in the supply chain to, at least, adopt 'one-up' due diligence on the next link in the chain. It is not practical for us (and every other participant in the chain) to have a direct relationship with all links in the construction industry
- We have in place systems to encourage the reporting of concerns and the protection of whistle blowers

Training

We have made our procurement staff aware of their obligations under the Modern Slavery Act. All directors & senior staff have been briefed on the legislation.

Right to Work in the UK checks – Guidance Notes

All UK employers are legally required to check and record the immigration status of every prospective employee/employee in order to verify their right to work in the UK.

The type of right to work checks required will depend on several factors, such as the individual's nationality and residence status:

- **UK citizens** Employers can check if an individual is a UK resident by asking to see their British passport, or to provide a UK birth or adoption certificate, plus an official government letter or document showing both their name and National Insurance number. This check only has to be done at the start of employment.
- **EEA and Swiss nationals** will have to provide evidence of settled or pre-settled status under the EU settlement scheme. N.B. Irish citizens do not require permission to enter, remain or work in the UK.
- **Non-EEA nationals**, or those without settled or pre-settled status under the EU Settlement Scheme, will usually demonstrate right to work by means of a work visa.

The Home Office's Right to Work checklist gives details of which Right to Work documents must be provided by individuals to employers, and how employers should carry out document checks in order to meet the required standards for compliance.

For further details, see: <https://www.gov.uk/check-job-applicant-right-to-work>.

Every individual must provide evidence of their right to work in the form of valid, acceptable documentation. Checks must be carried out on all employees, including British nationals, EU citizens and non-EEA nationals, before they start work.

Complying with Right to Work checks

Employers must have in place appropriate systems to check and record employees' immigration and working status in line with the Home Office Right to Work checklist. In this connection, employers should:

1. Conduct online document checks

The easiest and quickest way to check an individual's immigration status and right to work status is using the Home Office's 'Right to Work Checking Service'. This check cannot be used for UK citizens.

The online service is only available where the individual:

- Has a valid biometric residence permit or card;
- Has pre-settled or settled status under the EU Settlement Scheme;
- Has lawful status issued under the points-based immigration system;
- Has a British National Overseas (BNO) visa; or
- Has a Frontier Worker permit.

The online service allows an individual to provide their employer with a share code which is then used to view their right to work in the UK. The online service operates on the basis of the worker first accessing their own Home Office right to work record. The worker can then share this information with their employer, using a code generated to give permission to view their status.

There are three basic steps to carrying out an online check of someone's immigration status:

- view the applicant's right to work details by inputting the share code, along with their date of birth;
- check that the online photograph matches the applicant; and
- retain a clear copy of the response provided by the online service, storing that response securely by way of electronic or hard copy for the duration of the individual's employment and for at least two years afterwards.

2. Conduct manual check of right to work documents

An individual does not have to agree to provide the employer with a share code to check their immigration status using the online checking service. In these circumstances, or where their immigration status is otherwise unavailable to view online, the employer can conduct a manual check of their right to work documents, such as their passport or biometric residence permit.

The steps to undertake a manual check of right to work documents are as follows:

a. Obtain acceptable Right to Work documents

Employers can only accept documents from the Home Office's List A, List B Group 1 or List B Group 2

The Home Office has three different categories of 'acceptable' documents that deal with different types of permission and working status:

List A

After the initial pre-employment check, employers will not be required to carry out any further right to work checks.

List B Group 1

Employers have a time-limited statutory excuse, which ends when the individual's permission to remain in the UK expires. Employers should carry out a follow-up check when the document evidencing their permission to work expires.

List B Group 2

Employers have a time-limited statutory excuse that expires six months from the date specified in the Positive Verification Notice. Employers should carry out follow up checks before this notice expires.

b. Check the validity of the Right to Work documents

Employers must check that the documents are genuine and that the person presenting them is the prospective employee or employee, the rightful holder and allowed to do the type of work that is being offered.

Employers must check:

- Dates of birth are consistent across documents;
- Photographs are consistent with the individual's appearance;
- Expiry dates for permission to be in the UK have not passed (if applicable);
- The prospective employee is allowed to do the type of work on offer;
- The documents are genuine; and
- The reasons for any difference in names across documents e.g. marriage or divorce.

c. Copy the documents provided

Employers have to make a formal record of the documents they have checked.

Each document has to be copied at the time the check is made. The copy must be clear, and in a format which cannot be altered or edited at a later date.

Employers must also record the date the check was made.

Document copies have to be retained securely, either electronically or in hard copy:

- **Passports.** Any page with the document expiry date, nationality, date of birth, signature, leave expiry date, biometric details and photograph and any page containing information indicating the holder has an entitlement to enter or remain in the UK and undertake the work in question; and
- **All other documents.** The document in full and both sides of a Biometric Residence Permit.

This evidence must be retained for the duration of the individual's employment and for a further two years after they stop working for your organisation.

Loss of Right to Work

If, during a repeat right to work check, the employer becomes aware that an employee no longer has the right to work, or that they are in breach or excess of their permission by being employed in the role (e.g. in respect of number of working hours) and the employer continues to employ that person, they will become liable for a civil penalty and the criminal offence of knowingly employing an illegal worker.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes O'Malley's slavery and human trafficking statement for the financial year ending 31st December 2024.

This Modern Slavery and Human Trafficking Statement has been approved and authorised by:

Signature 

Name Adrian O'Malley

Position Director