

Project:	Lynch Modern Slavery Plant/Labour	RA No:	94	Review Date
Operation / Task:	All Business	Persons at risk:	All Employees	31/01/2027
Location / Area:	Nationwide	Public at risk:	No	
Monitoring Responsibility:	Director of BI, P&C			

KEY

S = Severity Rating

- Negligible
- Minor Injury
- Major Injury (RIDDOR)
- Fatality
- Multiple Fatality

L = Likelihood of Occurrence

- Improbable
- Remote 1 – 10%
- Possible 10 – 50%
- Probable 50 – 90%
- Almost certain 90%+

RR = Risk Rating

Severity	5	4	3	2	1
5	5	10	15	20	25
4	4	8	12	16	20
3	3	6	9	12	15
2	2	4	6	8	10
1	1	2	3	4	5
	1	2	3	4	5
	Likelihood				

R Unacceptable risk, plan out or add further controls.
O Acceptable only if no other method viable & with high level controls in place.
Y Acceptable with suitable controls.
G Acceptable, no further action required.

Activity	Hazards/Risks Identified	Risk Rating			Control Measures	Residual Risk			Responsibility
		S	L	RR		S	L	RR	
Onboarding New Suppliers	Lack of visibility of supply chain (use of unethical or non-compliant suppliers, sourcing from high-risk regions)	4	4	16	<ul style="list-style-type: none"> Conduct supplier Pre-Qualification Questionnaire (PQQ) including detailed MS, human rights, and ethical sourcing questions. Request and review Modern Slavery Statement and supporting documentation. Verify supplier registration, ownership, and operating location. Conduct risk-based audits of supplier labour practices (random and targeted). Maintain an approved supplier list subject to revalidation every 12 months Follow Lynch on-boarding process SP76 	4	2	8	Accounts Payable / HSQE / Director of BI, P&C
Subcontractor and Labour Supply Engagement	Exploitation of workers through agencies, gangmasters, or umbrella companies;	4	4	16	<ul style="list-style-type: none"> Conduct due diligence on all labour providers — ensure they are GLAA licensed (Gangmasters and Labour Abuse Authority). 	4	2	8	Accounts Payable / HSQE / Director of BI, P&C
Subcontractor and Labour Supply Engagement	underpayment, coercion, or poor working conditions	4	3	12	<ul style="list-style-type: none"> Require subcontractors to sign the Modern Slavery Code of Conduct. Conduct random worker interviews and site inspections. Require proof of Right to Work (R2W), verified in person. Maintain record of payment transparency and ensure payments made directly to individual bank accounts. 	4	1	4	Accounts Payable / HSQE / Director of BI, P&C

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Risk Rating Legend:

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		S	L	RR		S	L	RR	
				16	<ul style="list-style-type: none"> Implement three-stage interview process including welfare and independence checks. 			4	
Recruitment of PAYE Employees	Workers under duress or control (debt bondage, forced labour, or document retention)	4	4	16	<ul style="list-style-type: none"> Verify Right to Work documentation in person prior to onboarding. Cross-check bank details to identify duplicates (possible signs of coercion). Provide induction on worker rights and whistleblowing procedures. Ensure confidential reporting mechanisms (e.g. MS reporting email, P&C contact). Verify all trade qualifications, competency cards (CPCS/CSCS). Check Right to Work (R2W) and cross-check details with umbrella company. 	4	2	8	Accounts Payable / HSQE / Director of BI, P&C
Recruitment of CIS / Labour-only Contractors	Lack of local awareness; potential exposure to organised labour exploitation or trafficking	4	3	12	<ul style="list-style-type: none"> Conduct local area risk assessment before mobilisation (including known MS or trafficking indicators). Appoint a local operational lead responsible for welfare oversight. Provide targeted Modern Slavery awareness training to supervisors and leads. Establish local reporting routes and contact with Gangmasters and Labour Abuse Authority (GLAA) or law enforcement where applicable. Only use vetted, contracted agencies who have passed due diligence and signed MS Policy. 	4	1	4	Accounts Payable / HSQE / Director of BI, P&C

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Most effective
Least effective

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Use of Temporary Labour or Agency Staff	Unverified agencies supplying vulnerable workers; risk of hidden exploitation	3	4	12	<ul style="list-style-type: none"> Request regular agency worker audits (payslips, contracts, R2W). Conduct worker welfare interviews at random intervals. Ensure agency contracts include termination clauses for MS non-compliance. Require supply chain transparency up to Tier 2 suppliers. Prefer UK/EU-certified suppliers or those with SA8000 or Sedex accreditation. Conduct annual supplier compliance reviews. Deliver mandatory annual Modern Slavery Awareness Training for all employees. 	4	1	4	Accounts Payable / HSQE / Director of BI, P&C
Employee and Manager Awareness	Staff unaware of MS indicators or reporting channels	4	3	12	<ul style="list-style-type: none"> Issue Modern Slavery Policy and Code of Conduct to all staff. Display posters with reporting hotline and confidential contact email. Refresher training for line managers and supervisors annually. Maintain confidential whistleblowing procedure accessible to all staff and subcontractors. Train managers to recognise signs of exploitation (shared accommodation, withheld documents, etc.). 	4	1	8	Accounts Payable / HSQE / Director of BI, P&C
Incident Reporting and Escalation	Failure to identify, report, or act on potential Modern Slavery concerns	4	4	16	<ul style="list-style-type: none"> Establish reporting protocol for escalation to HSQE Director or external authorities. Record and investigate all incidents under HSQE governance. 	4	2	8	Accounts Payable / HSQE / Director of BI, P&C

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Risk Assessment Prepared By:	Paul Lynch	Signature:		Date:	31/01/2026
Risk Assessment Reviewed By:	Gareth Mariott	Signature:		Date:	31/01/2026