

Presteigne Broadcast Hire Limited - Modern Slavery Statement

Background

Presteigne Broadcast Hire Limited (“PBH”) does not meet the threshold set out for mandatory reporting in relation to the Modern Slavery Act 2015 however we believe that this is an important issue that businesses of all sizes should consider in its operating activities.

PBH believes that businesses have a responsibility to ensure that workers are not being exploited, that they are safe and that relevant employment (include wage and work hour), health and safety and human rights laws and international standards are adhered to, including freedom of movement and communications.

PBH recognises that all organisations have a legal duty to drive out poor labour practices in their business, and a moral duty to influence and incentivise continuous improvements in their supply chains.

Accordingly, PBH sets out in this statement its approach to tackling this critical issue.

Structure of this Statement

In accordance with the best practice statement set out on the Gov.UK website, PBH sets out in this statement its policies, practices and actions under the following headings:

1. Organisation structure and supply chains
2. Policies in relation to slavery and human trafficking
3. Due diligence processes
4. Risk assessment and management
5. Key performance indicators to measure effectiveness of steps being taken
6. Training on modern slavery and trafficking

Organisation structure and supply chains

PBH is a privately owned UK headquartered business that comprises two companies - Presteigne Broadcast Hire Limited and its parent company Independent Production Services Group Limited (“IPSG”). IPSG does not trade but merely holds the ownership of PBH and therefore this Statement focusses on PBH and its policies, processes and actions.

PBH provides equipment and engineers to the live broadcasting and related industries. Primarily it does this in the service of UK and Western Europe based customers and events but it has a growing customer base outside of these geographic areas including in Africa and the Middle East.

PBH operates from two UK based sites - its head office near Gatwick Airport and its northern base near Manchester. In addition, PBH works closely with a number of partner companies and individual business introducers who provide additional demand for its equipment and services.

PBH classifies its supply chains in four ways as set out below and approaches the risk assessment and due diligence process differently according to the relevant risk rating, which is expanded later in this Statement.

Sources and Categorisation Of Risk Amongst Suppliers		
Direct	<p>Employees Exclusively in the UK, employed directly and subject to UK employment law Low Risk</p>	<p>Purchased Equipment High profile major multinational manufacturers - Low Risk</p>
Indirect	<p>Freelancers Contracted in the UK - Low Risk Contracted Non UK - Medium Risk</p>	<p>Cross Hired Equipment Multiple suppliers based in different countries but all supplying the same or similar equipment as PBH owned kit Low Risk</p>
	Personnel	Equipment

PBH does not have extended supply chains - it buys and uses equipment provided by a small number of high profile international manufacturers (e.g. Canon and Sony). There is a small but increasing need for PBH to contract with freelancers to engineer and operate its equipment in developing countries and this represents the area of greatest risk, a risk that is managed in line with this statement and its underlying policies and procedures.

Policies in relation to slavery and human trafficking

PBH has a zero-tolerance approach to modern slavery, and 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 modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with, if they were to apply to PBH, any disclosure obligations under the Modern Slavery Act 2015.

We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, and we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, workers, freelancers, contractors, external consultants, third-party representatives and business partners.

The PBH Board has overall responsibility for ensuring this policy complies with its legal and ethical obligations, and that all those under its control comply with it. The Chief Executive Officer (“CEO”) has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery. Line Managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given training whenever it is relevant to the role they are performing.

Due diligence processes

The CEO is primarily responsible for the process of identifying the relevant risk factor to be applied in relation to any individual supplier and for implementing the required due diligence process.

Where the Original Equipment Manufacturer (“OEM”) is a top tier manufacturer - a category that accounts for the largest part of PBH’s equipment inventory - then PBH relies upon the Modern Slavery Statement or equivalent public declarations in relation to these and related matters (such as an Ethics or Corporate Social Responsibility Policy where there is no direct equivalent to the Modern Slavery Act 2015).

Where the OEM is not a top tier manufacturer and/or does not have a published commitment to tackling the issues identified in this Statement then enquiries are made of the manufacturer and commitments sought in relation to the issue of Modern Slavery. If such enquiries and/or commitments do not provide a sufficient degree of comfort, then alternative suppliers are sought for the products being purchased. It is PBH policy to not purchase from any supplier that is unable to meet this requirement.

In relation to the recruitment of contractors and freelancers, where such recruitment is outside of the UK then extra care is taken to ensure that such recruitment is on at least local market terms. PBH works with partners who have experience and local knowledge in the relevant country so that it can be sure both in the quality of the personnel provided and that such provision is on appropriate local terms.

PBH undertakes appropriate due diligence on these partners to ensure that there is appropriate benchmarking to protect against any exploitation of those personnel provided for work undertaken by PBH.

Where the contracting takes place in the UK, PBH is satisfied that the market is well regulated through a deep market of both supply and demand factors and that prices paid for personnel are at a fair market price.

Risk assessment and management

Identifying the principle risks is the responsibility of the CEO under the review of the PBH Board.

Those risks and their categorisation are set out earlier in this Statement. The risks and their categorisation are kept under review no less frequently than annually and immediately upon any material change in composition of the PBH business that may give rise to new or heightened risks.

All decisions regarding the purchase of equipment or hiring of contractors or employees are made under the supervision of senior managers who are aware of their responsibilities under this Policy and the Statement. Other than in relation to the cross hiring of equipment, such matters are typically reviewed by the CEO before a commitment to the transaction is made on behalf of PBH, as an additional layer of control.

Key performance indicators to measure effectiveness of steps being taken

There are no specific Key Performance Indicators (“KPI’s”) in place to measure effectiveness. This is because PBH does not believe that the risks are sufficiently high or easily measurable to develop and maintain a specific system for this purpose.

All use of contractors or freelancers outside of the UK is undertaken under the supervision of either the Chief Technology Officer (“CTO”) or the CEO, whose consent must be provided to use any personnel not specifically provided by an approved partner. An approved partner is one who has previously been so approved by the CEO after relevant Due Diligence.

Training on modern slavery and trafficking

Awareness training for line managers who have, or supervise staff who have, the responsibility to buy or hire equipment or recruit contractors or freelancers outside of the UK is undertaken no less frequently than annually.

Signed

A handwritten signature in black ink, appearing to read 'Adrian Young', written over a horizontal line.

Adrian Young

Chief Executive Officer
30th April 2021