

Modern Slavery Policy

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1 Definition of modern slavery

- 1.1 “Modern slavery” is a term which covers slavery (where ownership is exercised over a person); servitude (which involves the obligation to provide services imposed by coercion); forced or compulsory labour (which involves work or service exacted from any person under the menace of a penalty and for which the person has not offered himself voluntarily); and human trafficking (which concerns arranging or facilitating the travel of another with a view to exploiting them, even where the person consents to the travel).
- 1.2 We will ensure that we will comply with the Modern Slavery Act 2015 and are putting strict measures in place to ensure that modern slavery is not part of any of our business operations. This includes our supply chains, goods and services. This statement sets out the steps we are taking to continually develop our procedures and to check our compliance.
- 1.3 This statement covers our financial year ending March 2024.

2 Overview

- 2.1 An overview of our organisational structure, key business activities and supply chains is as follows:
- The Company operates in the field of Health and Safety.
 - The Company is owned by Paul Whately
 - We will make appropriate checks when placing any orders with new suppliers and that existing key suppliers are audited from time to time to ensure continued compliance. Such checks may include ad hoc visits, audits and regular monitoring.
- 2.2 We work closely with our main suppliers and customers; with our employees and their representatives to ensure the highest level of compliance with ethical trading initiatives wherever possible and the Health and Safety Executive, and we will ensure that we help to eliminate modern slavery. We inform our suppliers that we have a modern slavery policy and ask them to inform us of the steps they are taking to eliminate modern slavery.
- 2.3 We will ensure that all recruitment terms and conditions of employment comply with statutory requirements and that any agencies used are appropriately checked and commit to ethical standards under the Act and we have a preferred supplier list of reputable recruitment agencies where possible

3 Responsibilities

- The Board of Directors of Safetycare UK Ltd is responsible for overseeing our efforts to help to eliminate modern slavery and for monitoring progress against the KPIs contained in this document.
- The General Manager is responsible for ensuring that all recruitment and terms and conditions of employment comply with statutory requirements, and that any agencies used are appropriately checked and commit to ethical standards.
- Managers are responsible for upholding our “core values” and for ensuring that employees who work for them also behave in accordance with these.
- Our General Manager is responsible for ensuring that appropriate checks are made prior to placing any orders with new suppliers, and that existing key suppliers are audited from time to time to ensure continued compliance.
- Our General Manager work with our major customers to provide them with appropriate information on our modern slavery initiatives and to gain suggestions and feedback.
- Our Senior Management Team who meet regularly will discuss issues that arise under Modern Slavery.

4 Documentation

4.1 We have the following associated policies in place for employees:

- Business ethics policy
- Corporate social responsibility policy
- Grievance procedure
- Equal opportunity policy
- Whistleblowing policy

4.2 These are accessed via Breathe, and copies are available. All non-contractual policies are updated in accordance with legislative changes, and we communicate such changes accordingly.

4.3 Employees are reminded of the policies from time and time, and notified of any updates.

5 Risk assessments

5.1 We consider that the main areas of risk of modern slavery within our business and supply chain relate to recruitment and business ethics, especially in relation to modern slavery in our supply chain.

6 Actions we are taking

6.1 We have taken the following actions as part of our drive to eliminate modern slavery:

6.2 Employees

- 6.2.1 All new employees are recruited directly. Right to work checks are conducted prior to joining, and we check with all new recruits that they have not been required to pay any fees to gain work with us, and inform them of the procedures that should be followed should they wish to leave our employment. In addition, we check that their passports have not been withheld and that they have not been required to sign any agreements with any third parties in respect of our offer of employment.

6.3 Agency workers

- 6.3.1 We only use agency workers sparingly, for temporary placements and holiday/sickness cover.
- 6.3.2 We will ensure that any recruitment agencies we use have strict compliance to the Modern Slavery Act and require written confirmation from them that no agency worker is being exploited as part of any slavery or human trafficking. Recruitment agencies used will all be on our Preferred Supplier Listing.

6.4 Other Suppliers

- 6.4.1 We use suppliers for office IT, cleaning, Office consumables, recycling and general maintenance.

6.5 Customers

- 6.6 We also work closely with our major customers to ensure optimum environmental friendliness and to ensure that our practices and procedures are in line with national standards. This statement is brought to the attention of our customers via our website.

7 Due diligence, monitoring and auditing processes

- 7.1 All suppliers are issued with our Supplier Agreement and are required to sign and return a commitment to ensuring that they take appropriate steps to ensure that their businesses and supply chains are free from modern slavery prior to any orders being placed with them.

8 Penalties for breach

- 8.1 If a supplier is found to be involved in any form of modern slavery, its contract will be terminated either immediately or on its due renewal date, depending on the severity of the breach and we may also report any suspicions of criminal activity to the police.
- 8.2 If the breach is a minor one, we commit to helping that supplier by providing guidance and support for the affected workers if required.

- 8.3 If it is established that any employee has acted in breach of any of our policies, or is aware of, has condoned or failed to report any suspicion of modern slavery within our business or supply chains, he/she will be subject to our disciplinary procedure.

9 Training

- 9.1 We will provide suitable training for all employees to ensure that they are aware of this Statement and can be vigilant in identifying and reporting any concerns they have.
- 9.2 Employees and managers are informed of any updates to our policies.

10 Relevant performance indicators

- 10.1 The following key performance indicators will be used to assess our progress in the year to 31st March 2024 towards eliminating modern slavery:
- all staff in business development, sales and purchasing departments are to be trained
 - number of complaints raised through our grievance or whistleblowing procedures
 - number of suppliers who are terminated due to allegations of modern slavery
 - 100% of suppliers signed up to our Code of Conduct

Signed by: 

Name: Rebecca Booy

Office held: Office Manager (UK)

Date: 01/04/2023