

Anti-slavery policy

What is slavery?

The Modern Slavery Act (MSA) 2015 covers four activities:

Slavery	Exercising powers of ownership over a person
Servitude	The obligation to provide services is imposed by the use of coercion
Forced compulsory labour or	Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily
Human trafficking	Arranging or facilitating the travel of another person with a view to their exploitation

This policy covers all four activities.

How is it relevant to us?

Modern slavery is a complex and multi-faceted crime and tackling it requires all of us to play a part. At first glance, you may think this whole subject is irrelevant to us, but it's not.

At a very basic level, of course preventing exploitation and human trafficking, and protecting our workforce and reputation makes good business sense.

The MSA 2015 recognises the important part businesses can and should play in tackling slavery and encourages them to do more.

With this in mind, we need to pay particularly close attention to:

- our supply chain
- any outsourced activities, particularly to jurisdictions that may not have adequate safeguards

Responsibilities

Solar Gates UK, our managers and colleagues have responsibilities to ensure our fellow workers are safeguarded, treated fairly and with dignity.

Everyone must observe this policy and be aware that turning a blind eye is unacceptable and simply not an option.

Organisation responsibilities

We will:

- maintain clear policies and procedures preventing exploitation and human trafficking, and protecting our workforce and reputation,
- be clear about our recruitment policy (see Recruitment),
- check our supply chains (see Supply chains),

- lead by example by making appropriate checks on all employees, recruitment agencies, suppliers, etc to ensure we know who is working for us,
- ensure we have in place an open and transparent grievance process for all staff,
- seek to raise awareness so that our colleagues know what we are doing to promote their welfare,
- make a clear statement setting out the steps we have taken to ensure slavery and human trafficking is not taking place in our supply chains and to demonstrate that we take our responsibilities to our employees and our clients seriously (see Anti-slavery statement below).

Manager responsibilities

Managers will:

- listen and be approachable to colleagues,
- respond appropriately if they are told something that might indicate a colleague or any other person is in an exploitative situation,
- remain alert to indicators of slavery (see Identifying slavery),
- raise the awareness of our colleagues, by discussing issues and providing training, so that everyone can spot the signs of trafficking and exploitation and know what to do,
- use their experience and professional judgement to gauge situations.

Colleagues

We all have responsibilities under this policy. Whatever your role or level of seniority, you must:

- keep your eyes and ears open—if you suspect someone (a colleague or someone in our supply chain) is being controlled or forced by someone else to work or provide services, follow our reporting procedure (see Reporting slavery),
- follow our reporting procedure if a colleague tells you something you think might indicate they are or someone else is being exploited or ill-treated,
- tell us if you think there is more we can do to prevent people from being exploited.

The risks

The principal areas of risk we face, related to slavery and human trafficking, include:

supply chains

recruitment through agencies

general recruitment

We manage these risk areas through our procedures set out in this policy and elsewhere.

Our procedures

Anti-slavery statement

We make a clear statement setting out the steps we have taken to ensure slavery and human trafficking is not taking place in our supply chains and to demonstrate that we take our responsibilities to our employees, people working within our supply chain and our clients seriously.

We make this statement on our website and add it to the government's online modern slavery statement registry.

Our historic statements remain available upon request.

- Solar Gates UK supplies to companies across the highways, construction and rail industries as well as education and hospitals. We utilise a host of suppliers ourselves, for parts and materials.
- This policy sets out the key risk areas we face and our approach to avoiding and preventing modern slavery.

Supply chains

We thoroughly check supply chains to ensure the potential for slavery and human trafficking is significantly reduced.

We tell the companies we do business with that we are not prepared to accept any form of exploitation.

All our supplier contracts contain an anti-slavery clause. This clause, which flows down through all layers of our supply chain, prohibits suppliers and their employees from engaging in slavery or human trafficking.

We ensure we can account for each step of our supply processes—we know who is providing goods and services to us and we have mechanisms and processes in place to check, including:

Our new supplier application form, which asks questions of potential suppliers to evidence their commitment to the Act

Recruitment

Using agencies

Our recruitment team follows firm policy and only uses agreed specified reputable recruitment agencies.

To ensure the potential for slavery and human trafficking is reduced as far as possible, we thoroughly check recruitment agencies before adding them to our list of approved agencies. This includes:

- conducting background checks
- investigating reputation
- ensuring the staff an agency provides have the appropriate paperwork (e.g. work visas)
- ensuring the agency provides assurances that the appropriate checks have been made on the person they are supplying

We keep agents on the list under regular review, at least every 3 years.

General recruitment

We always ensure all staff have a written contract of employment and that they have not had to pay any direct or indirect fees to obtain work.

We always ensure staff are legally able to work in the UK.

We check the names and addresses of our staff (a number of people listing the same address may indicate high shared occupancy, often a factor for those being exploited).

We provide information to all new recruits on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.

If, through our recruitment process, we suspect someone is being exploited, the HR department will follow our reporting procedures (See Reporting slavery).

Identifying slavery

There is no typical victim and some victims do not understand they have been exploited and are entitled to help and support.

However, the following key signs could indicate that someone may be a slavery or trafficking victim:

- the person is not in possession of their own passport, identification or travel documents;
- the person is acting as though they are being instructed or coached by someone else;
- they allow others to speak for them when spoken to directly;
- they are dropped off at and collected from work;
- the person is withdrawn or they appear frightened;
- the person does not seem to be able to contact friends or family freely;
- the person has limited social interaction or contact with people outside their immediate environment.

This list is not exhaustive.

Remember, a person may display a number of the trafficking indicators set out above but they may not necessarily be a victim of slavery or trafficking. Often you will build up a picture of the person's circumstances which may indicate something is not quite right.

If you have a suspicion, report it.

Reporting slavery

Talking to someone about your concerns may stop someone else from being exploited or abused.

If you think that someone is in immediate danger, dial 999.

Otherwise, you should discuss your concerns with one of our directors who will decide a course of action and provide any further advice. Alternatively, you can raise it with an external party such as: Protect (formerly Public Concern at Work), an independent whistleblowing charity on 020 3117 2520 or online at

www.thelivewelldirectory.com or the Modern Slavery Helpline on 0800 0121 700 or online via www.modernslaveryhelpline.org.

Not all victims may want to be helped and there may be instances where reporting a suspected trafficking case puts the potential victim at risk, so it is important that in the absence of an immediate danger, you discuss your concerns first with your line manager before taking any further action.

We encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. You will not suffer any detrimental treatment as a result of reporting in good faith a suspicion that modern slavery is taking place in any part of the business or supply chain.

Training

We provide specialist training to those staff members who are involved in managing recruitment and our supply chains.

More general awareness training is provided to all staff through our Atlas training portal

Monitoring our procedures

We will review our Anti-slavery policy regularly, at least *annually*. We will provide information and/or training on any changes we make.

This policy is approved for use within Solar Gates UK Ltd for a period of 5 years, with amendments as necessary being disseminated to all staff at the time of the change

Date of approval	29/8/24
Name of person approving	Christopher Long
Role of person approving	Operations Director
Signature of person approving	