

**30th October 2016**

The Modern Slavery Act 2015 requires any commercial organisation carrying on business in the UK with a total annual global turnover of £36m or more to produce a slavery and human trafficking statement for each financial year of the organisation. The statement must be published on the website and a link to the statement must be in a prominent place on the homepage.

Modern Slavery is a term which encompasses slavery, servitude and forced or compulsory labour. Human trafficking is defined as arranging or facilitating the travel of another person with a view to that person being exploited.

Smart Solutions is committed to the highest standards of ethical conduct and integrity in its business activities and has a zero tolerance policy to slavery and human trafficking.

## **1. Our Organisation**

Smart provide bespoke workforce solutions for many industry sectors right across the UK. Offering expertise in tailor made master vendor solutions, managed services and general recruitment for our clients, our workforces are provided to meet the exact requirements of maximum productivity, quality and output.

A unique technology platform assists our clients in effectively managing all staffing related tasks, offering highest degrees of service transparency, streamlining time and cost management, and ensuring adherence to statutory legislation.

## **2. Risk and Exposure**

Smart Solutions Senior Management Team acknowledges that it is exposed to risk with regard to modern day slavery within the business and is committed to identifying such risk and putting in place appropriate control measures.

As part of this commitment Smart Solutions are members of Stronger Together (<http://stronger2gether.org/>) who provide guidance, resources and a network for employers, labour providers, workers and their representatives to work together to reduce exploitation.

Smart Solutions are also working with the charity 'Hope for Justice' (<http://hopeforjustice.org/>), to provide unbiased support or advice to any of our employees. "Hope for Justice exists to end Human Trafficking and Slavery, in our generation".

## **3. Our Staff and Workers**

Smart Solutions promotes a safe and healthy working environment. The health, safety and well-being of our staff is a high priority and critical to the Company's success.

Smart Solutions ensures that all staff and workers are paid at or above the national minimum wage and that it complies with its obligation under the Working Time Regulations. Smart operates all sites/branches with competent staff to ensure the highest control of the working environment.

#### 4. Our Actions

Smart Solutions is taking a variety of actions to verify the absence of forced labour, slavery and human trafficking in its business including the following:

- Representing our commitment to zero tolerance and support of potentially affected staff and workers, Smart Solutions has in place the following policies:
  - Hidden Labour Exploitation
  - Potential Victim of Trafficking Escalation Procedure
  - Whistleblowing
- GLA Licence obtained (Gangmasters Licencing Authority) <http://www.gla.gov.uk/>
- ALP Licence obtained (Association of Labour Providers) <http://labourproviders.org.uk/>
- Audits – remote and onsite compliance audits, both internally and through an independent third party, as well as spot checks conducted by operational management.
- Quality & Environmental Standards - accredited to ISO9001 and ISO14001 Environmental standards, which encompass modern day slavery and human trafficking management processes.
- Internal Accountability – as part of the internal audit process and evaluation we have implemented standards and procedures to be followed and a minimum scoring criteria to be achieved. Audit results are raised at senior management level and discussed at Divisional Business Review meetings, where standards are reviewed and any remedial actions taken.
- “Speak up with confidence” - a confidential and secure “helpline” service for the use of employees, clients, suppliers & contractors to raise concerns about any potentially unsafe, unethical or unlawful conduct. Confidential helpline- 0333 210 0146; email: [confidential@smartsolutions.co.uk](mailto:confidential@smartsolutions.co.uk)
- Training – as part of a thorough induction process all staff attend formal Induction training which outlines our compliance requirements and standards as a business. All operational staff have been trained in Hidden Labour Exploitation.
- Awareness Campaign / marketing material – Multilingual awareness material providing advice on modern day slavery and advertising our helpline has been distributed at each site/branch. These materials correlate multi-lingual information sourced through Stronger Together and Hope for Justice.
- Coordination with Hope for Justice - a representative of Hope for Justice attended our Staff Conference in late 2015 to assist with the launch of our zero tolerance approach to modern slavery and human trafficking. Where appropriate, Smart Solutions also coordinates with Hope for Justice on specific human trafficking matters, on staff training and in further engagement with its supply chain.

#### Summary

Our focus on slavery and human trafficking is a key business priority and we encourage transparency and accountability at all levels in addressing the challenge.

Smart Solutions will not support or engage with any business knowingly involved in slavery or human trafficking.

Smart Solutions will not tolerate forced, bonded or indentured labour, involuntary prison labour, slavery or trafficking in its business.

**Nathan Bowles**  
CEO