

30th October 2017

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.

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 have also partnered with the charity 'Hope for Justice' (<http://hopeforjustice.org/>), to provide unbiased support and advice to the business. "Hope for Justice exists to end Human Trafficking and Slavery, in our generation".

Smart Solutions takes a variety of actions to challenge the presence 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
- GLAA Licence obtained (Gangmasters & Labour Abuse Authority) <http://www.glaa.gov.uk/>
- Membership of ALP(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.
- 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.
- Quality & Environmental Standards - accredited to ISO9001 and ISO14001 Environmental standards, which encompass modern day slavery and human trafficking management processes.
- "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
- Training – as part of a thorough induction process all staff attend formal Induction training which outlines our compliance requirements and standards. All operational staff have been trained in Hidden Labour Exploitation and refresher sessions have taken place in high risk areas.
- Reports – Automatically generated weekly reports which flag duplicate bank accounts, addresses and highlight any suspect details from our employee database. This also includes transparent client specific reports and notifications of any potential activity.
- Welfare Sessions – Welfare Interviews are conducted with any member of staff that may present any indicators of forced labour or exploitation. Questions are initially raised by Smart Solutions and supported by Hope for Justice onwards.
- 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 material correlate multi-lingual information sourced through Stronger Together and Hope for Justice.
- Corporate Partnership with Hope for Justice - Smart Solutions also coordinates with Hope for Justice on specific human trafficking matters, on staff training, on site surgeries and in further engagement with its supply chain.

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 tolerate forced, bonded or indentured labour, involuntary prison labour, slavery or trafficking in its business.

Nathan Bowles
CEO