

# ANNUAL STATEMENT

## MODERN SLAVERY

### INTRODUCTION

This statement relates to actions and activities during the calendar year 1st January 2021 to 31 December 2021.

The Modern Slavery Act 2015 was introduced by the UK government to address slavery and human trafficking.

Modern Slavery can occur in various forms including servitude, forced or compulsory labour and human traffic and can affect children and adults.

This statement sets out TrustOn's actions to understand all potential Modern Slavery risks related to its business and to put into place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

The company is subject to annual audits from various bodies, to ensure the highest standards of Health and Safety and wellbeing are maintained. As a result, we are accredited with the following:

- SIA: Approved Contractor Status
- Safe Contractor Approved

### COMPANY STRUCTURE AND SUPPLY CHAINS

TrustOn has no subsidiaries and so this statement applies only to TrustOn Ltd, trading as TrustOn Security.

The company provides a range of professional security services, including but not limited to, manned guarding, mobile patrols, keyholding, alarm response and CCTV monitoring.

When sourcing suppliers we always seek suppliers, who are:

- Able to respond to changing needs and priorities.
- Able to take the lead in developing innovative service and product solution.
- Able to identify, communicate and effectively manage problems in a proactive fashion.
- Proactive in the use of modern technology and trying to improve efficiency.
- Financially stable.

Additionally, we also consider our supplier's approach and policies relating to the use of child or forced labour, fair pay for employees and anti-corruption. Furthermore, we look at their Health and Safety Policies and their compliance with the working time regulations. We have in place a structured supplier assessment process designed to evaluate the capabilities of potential suppliers reflecting both the nature of the proposed purchase(s) and the associated business risk. The organisation is currently requesting from our suppliers their Modern Slavery statements to ensure compliance.

## **HIGH RISK ACTIVITIES - SECURITY**

The organisation has recognised the Recruitment and Vetting process as a potential high-risk activity. As part of our recruitment process, the Company outsources its vetting and screening, through a specialist Company, Affordablescreening.com.

The following information is checked throughout this process:

- Right to work
- Personal Details
- SIA Licence check
- Proof of address, not longer than 3 months old
- Education, employment, gaps in employment history
- At least one referee
- Details of any cautions or convictions
- Credit check and details of bankruptcy and/or court judgements
- Supporting photographic ID
- Full 5-year background check

All screening files comply and adhere to BS 7858 (British Standard for security screening).

## **COUNTRIES OF OPERATION**

The organisation provides manned guarding officers as well as mobile patrols, keyholding, alarm response and CCTV monitoring. These services are provided to a range of sectors including retail, universities, public buildings, the NHS and commercial industries. We currently only operate in England.

## **RESPONSIBILITY**

Responsibility for the organisation's anti-slavery initiatives is as follows:

Policies - the HR Director and Office Manager are responsible for putting in place and reviewing policies and the process by which they were developed.

## **POLICIES AND CONTROL**

The Company operates the following policies that supports its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

Ethical Policy and Code of Conduct: The organisation is committed to achieving its business goals in an open, honest, ethical and principled manner and strives to do business with customers and suppliers of sound business character and reputation. It does not knowingly

support any public or private organisation that espouses discriminatory policies or practices and requires all its employees to perform their work with honesty, truthfulness and integrity.

Employee Handbook: The organisation's handbook and additional policies make clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating and in managing its supply chain.

Supply Chain Policy: The organisation is committed to ensuring that its suppliers adhere to the highest ethical standards. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. Serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.

Recruitment policy: The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency, before accepting workers from that agency. The Companies employees and any agency staff are vetted to the BS7858 standard.

Compliance: The organisation has a dedicated compliance officer, who oversees the enforcement of the BS7858 standard and is responsible for the vigorous audits the company undertakes to maintain its accreditations.

## **TRAINING**

Modern Slavery training is being developed and will be cascaded through the organisation.

TrustOn recognises that Modern Slavery is a continuous risk. The Company monitors its business and strives to enhance its culture to demonstrate its commitment to preventing it.

## **DIRECTOR APPROVAL**

This statement has been approved by the organisation's Leadership team, who will review and update it annually.

Director's Name: Clare Porter

Date: January 2021