

## Modern Slavery Statement

This statement is made in accordance with Section 54(1) of the Modern Slavery Act 2015 and constitutes Smart Solutions' anti-slavery and human trafficking statement for the financial year 2020/21.

April 2020



### A message from our CEO

Smart Solutions (Recruitment) Limited is committed to acting ethically and with integrity in all its business dealings. As part of this commitment, we continue to develop and implement robust systems and controls to mitigate the risk of modern slavery anywhere within our business operations or supply chain.

We recognise that in order to fully deliver on this commitment, we must continue to strive for improvement in all our processes. In 2019/20 we therefore continued to develop our practices whilst broadening our guidance and education methodologies to our supply chain. We have also continued our relationships with Slave Free Alliance and Hope for Justice, playing an active part in their growing community of businesses. The Slave-Free Alliance provides knowledge and resources to give businesses the tools they need to identify the risk of modern slavery within their organisations and then put in place appropriate control measures. We look forward to our continued work with Slave-Free Alliance and to further develop our existing internal processes.

All those with whom we do business are expected to follow the highest ethical principles. Here at Smart, we expect all our business partners, representatives and suppliers to have robust processes in place to eliminate the risk of modern slavery occurring in their organisations. This has resulted in strengthened internal due diligence and other processes designed to allow us to monitor and work closely with our supply chain partners to achieve this aim.

Smart's commitment to combatting modern slavery is supported by its core values: -

- Smart Hearts
- Smart Safety
- Smart Solutions
- Super Smart
- Smart Success
- Smart Cares

Our new Modern Slavery Statement develops these themes and sets out Smart's detailed and strong ambition to prevent modern slavery from occurring anywhere within our organisation or in our wider business relationships.

### Robert Webb

Chief Executive Officer

Smart Solutions (Recruitment) Limited

## Background



Smart provide large scale, bespoke workforce solutions for the waste and recycling industry across the UK. Offering expertise in tailor made master vendor solutions, managed services and recruitment for our clients.

Workforces are meticulously assembled for maximum productivity and maximum output.

A unique technology platform assists our clients in

effectively managing all staffing related tasks, to streamline time and cost management, adhere to legislation and increase efficiency.

The Modern Slavery Act 2015 was designed to tackle slavery in the UK.

Modern slavery is a criminal offence and can happen in various forms. The offence covers slavery, servitude, human trafficking and forced labour, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal gain.

### Our Employees

Smart recognise that its industry and the industries it supplies are often targeted by Gangmasters seeking to exploit individuals for financial gain.

Our workforce consists of permanent and temporary employees who work alongside our clients and their respective workforce.

Smart works particularly closely with our clients and other business partners to ensure consistent approaches and collaboration on prevention activity.



## Review of current action

### Governance and overview

Delivery of modern slavery prevention practices at Smart is led by Jade Oliver-Morris, Head of HR – Managed Service Division. Overall responsibility sits with the Smart Solutions CEO, who receives regular progress reports, as does the Senior Management Team.

Smart has implemented a supplier guidance programme to further educate and provide information to our external network. During Anti-Slavery Day 2019, Smart launched new initiatives and implemented further resources for our employees to enable them to act in the event of an urgent anti-slavery requirement. It is important for the business to recognise these occasions, to spread awareness and share good practice.

### **Partnering and collaboration**

Achieving Smart's commitment to ensure that modern slavery does not occur anywhere within its business operations or its supply chain requires internal drive and energy but also external expertise, knowledge and collaboration. Smart chose to partner with Hope for Justice and Slave Free Alliance at the earliest opportunity in the focus on anti-slavery practices.

Slave-Free Alliance is a business scheme, run by global charity "Hope for Justice". Hope for Justice was founded in the UK in 2008 with the goals of preventing exploitation, rescuing victims, and restoring lives. Hope for Justice has since grown to become an international charity, working across four continents and running rescue programmes, aftercare facilities for vulnerable children and providing trauma care for victims of modern slavery.

Hope for Justice set up Slave-Free Alliance to work in collaboration with businesses to develop a proactive strategy that businesses and their supply chains can adopt to deal with the threat of modern slavery. The core objective of Slave-Free Alliance is to support businesses to work towards a slave-free organisation and supply chain. Smart have worked with Slave Free Alliance and Hope for Justice on a number of occasions to present on our organisation's experiences and offer useful information and insight on how other organisations can do the same thing.

Smart are also members of/licenced by the following organisations: -

#### ***Gangmasters and Labour Abuse Authority (GLAA)***

The GLAA works in partnership to protect vulnerable and exploited workers. They are a Non Departmental Public Body (NDPB) governed by an independent board.

Their role is to protect vulnerable and exploited workers. Through intelligence, they investigate reports of worker exploitation and illegal activity such as human trafficking, forced labour and illegal labour provision. They investigate all aspects of labour exploitation in England and Wales and also work with partner organisations such as the police, the National Crime Agency and other government law enforcement agencies to target, dismantle and disrupt serious and organised crime across the UK.

#### ***Stronger Together***

Stronger Together is a multi-stakeholder business-led initiative aiming to reduce modern slavery particularly forced labour, labour trafficking and other hidden third party exploitation of workers. They provide guidance, training, resources and a network for employers, labour providers, workers and their representatives to work together to reduce exploitation.

Stronger Together focus on creating advice that is practical, pragmatic and easy for any business, of any size to understand and use. Stronger Together launched in the UK in 2013 and have since grown to have a global reach, running projects and programmes in countries across the world.

#### ***Association of Labour Providers***

Established in 2004 at the instigation of the UK government, ALP is a specialist trade association promoting responsible recruitment and good practice for organisations that supply the workforce to the food processing, agricultural and wider consumer goods supply chain.

The ALP influences government and regulatory policy and provides a range of very useful information and services to its members.

The ALP's mission is for "UK labour provision to be recognised as a model of global good practice".

## Supply chains

Targeting modern slavery within Smart's business operations is not enough. Smart is also committed to addressing the risk of modern slavery Smart's supply chain. Smart has made changes to its supplier management processes however we recognise that there is still more to do and has begun to put in place a multi-stage due diligence and compliance assessment process, which will cover both the procurement phase and the contract delivery phase.

Ultimately, Smart expects its partners to work with it openly to identify and combat modern slavery. Smart will only trade with those suppliers who fully comply with the Code of Conduct, or those who are taking verifiable steps towards compliance.

## Policies

Smart's commitment to raising the bar to combat the risks of modern slavery and human trafficking in every area of its business is also to be found in the following documents: -

- Hidden Labour Exploitation Policy
- Code of Conduct

Smart has a dedicated internal working group with a cross-section of skills and knowledge to drive the programme forward including IT, Finance, Operations and HR.

## Training and awareness

Training is delivered to all permanent Smart employees during induction and is refreshed annually via e-learning. Training includes how to spot the signs of Modern Slavery, escalation processes and emergency procedures. Employees who work in 'high risk' geographical areas, determined by field experts, receive advanced training. This encompasses insight into specific gangs, local intelligence and operations.

All temporary employees are trained during induction on how to spot the signs. An audit mechanism has also been introduced to ensure consistency and compliance.

Various marketing facilities are used to spread awareness amongst our workforce including posters, bathroom stall stickers, leaflets and contact cards. All marketing is translated into various languages and details contact information for Hope for Justice and Smart's Confidential Helpline.

For Smart's supply chain partners, the 'Supplier Guide to Modern Slavery communicated during the evaluation process as part of requests for information. This document is being issued to all members of the supply chain through a bulk send out approach and then in subsequent tenders as necessary.

## Remediation

Smart works with charity partners across the UK to support in placing victims of modern slavery back in to work. Victims may have worked through Smart previously and been re-located and provided with safe harbour or may have worked through other employers. Building relationships with such partners as The Jericho Foundation, enable Smart to provide the most appropriate service and work assignment to a victim in line with their rehabilitation programme. Where possible and where we have multi-site contracts, Smart will endeavour to place a victim with the same client if they so wish. Smart offer training for specific skill areas as well as English Language courses.

## Reporting

Smart collates data on all suspect information including know associate information. Reports are run on a weekly basis against our personnel records to identify duplicates of bank account details and addresses. Smart also hold a database of blacklist information collated through work with West Midlands Police and Hope for Justice. Weekly reports identify changes or additions to personnel records that match blacklist data. Full internal investigations are conducted on any data hit.

## Next steps and targets

Throughout the coming year, Smart will be focussing on development of our anti-slavery process in relation to our external business partners and network.

We will continue to network with peers and external experts to share knowledge and experiences to understand what works well elsewhere and identify where further improvements can be made.

We will continue to work openly with suppliers, and will develop further protocols which will allow us to assess any instances of non-compliance within the supply chain on a case-by-case basis and tailor any remedial action appropriately.

We will use the energy and commitment of our staff as we proceed on our journey. Employees who have had training strongly support our commitment to develop processes to prevent any instances of modern slavery in our organisation.

We will develop our awareness programme to ensure that all staff are aware of the signs of modern slavery and know what to do if they suspect that a colleague may be a victim.

## Summary of action

Completed Action 2019/2020	To Complete 2020/2021
Launch of 'Employee Modern Slavery Incident Support Pack'.	New supplier monitoring and audit process implementation.
Refresh of all marketing to ensure re-view ability and increased presence.	Broaden network of external partners to include additional Police Forces (to that of West Midlands Police).
Launch of 'Supplier Guide to Modern Slavery'	Contribute to Government and Industry Leading research.
Inclusion of modern slavery insights in flexible employee assignment handbooks.	Further broaden scope of Modern Slavery prevention activity to Eastern Europe.
Creation of client data share for modern slavery activity.	Install Hope for Justice Freedom Wall to recognise the victims we support and continue to fundraise.
Collaborated with a broader network of organisations and represented the Labour Providers on targeted cross-industry panels/forums.	Creation of a Modern Slavery Standard along with Employee and Manager Guide.
Implementation of modern slavery prevention processes in European offices.	Implementation of a flexible employee probation period in order to create a legitimate opportunity to assess for modern slavery indicators on a one to one basis.
Creation of training for flexible employees	Creation of a multi-sector Abolition Group.
Creation and implementation of new auditing procedures.	Alignment to upcoming legislation changes.

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The statement was approved by the Smart Solutions (Recruitment) Limited CEO on 3<sup>rd</sup> April 2020.

*Robert Webb*

**Robert Webb**  
Chief Executive Officer  
Smart Solutions (Recruitment) Limited