



**ANTI-SLAVERY AND  
HUMAN TRAFFICKING  
POLICY**

# ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY



We are totally committed to preventing and remedying any acts of labour exploitation, modern-day slavery and human trafficking from our supply chain and within our business.

Definitions of modern slavery include:

- > forced labour
- > child labour
- > child slavery
- > debt bondage (debt slavery, bonded labour, or peonage)
- > human trafficking

This policy applies to every person working for us or on our behalf, including colleagues, directors, suppliers, clients, service partners or third-party representatives. All such persons or companies who have their own employees, suppliers and subcontractors that make up the wider part of our supply chain, are required to make sure our standards are understood and met in their operations too.

We recognise the particular demographics of people who may be particularly vulnerable to exploitation and modern slavery such as women, migrants and temporary workers.

We will not support or deal with any company who cannot meet the due diligence criteria or is knowingly involved in any acts of labour exploitation, modern-day slavery or human trafficking.

We support and uphold the aims of the [Modern Slavery Act 2015](#) and will ensure transparency within our company and in our dealings with suppliers of goods and services to ensure that any acts of labour exploitation, modern-day slavery or human trafficking is not taking place:

- > in any of its supply chains
- > in any part of its own business.

We are a family-owned business who provide cleaning and window cleaning services, as well as consumables to our clients. There are relationships with external business for sourcing consumables and other goods which may be imports. Suppliers of services are also part of our supply chain.

We understand we may be exposed to risks when using external businesses further down the supply chain, so our due diligence for approving prospective suppliers includes a review of the controls the supplier has in place for preventing slavery and human trafficking and to confirm the suppliers' compliance with the Modern Slavery Act 2015.

The Chair, Executive Board and Senior Leadership Team are responsible for communicating and implementing this policy and its objectives. To ensure that any acts of labour exploitation, modern-day slavery or human trafficking does not take place within our company or within our supply chain, we are committed to:

- > providing adequate training to all management to ensure they know how to work within provisions of the anti-slavery and human trafficking policy

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- > Associated policies and guidelines relevant to modern slavery, labour exploitation and human trafficking are below and should read in conjunction with this policy, as each policy provides more detail to our commitments and requirements:
  - > grievance procedure
  - > whistleblowing policy which includes initiatives such as Safecall and Ask Monica
  - > anti-harassment and anti-bullying policy
- > obtaining statement of compliance with our Code of Conduct from third parties, which sets out the minimum standards required to combat any act of labour exploitation, modern slavery and human trafficking. These standards demonstrate clearly Regular Cleaning's standards externally and include the commitment to respect and protect human rights of all workers in operations and supply chain. We are committed to provide safe working environments and anti-discrimination and business ethics. This includes a workers' right to organise and bargain collectively as the foundations for realising other labour rights. Suppliers must also guarantee this right of employees to join unions. Our code of conduct is provided to all suppliers, and outlines that they must fully comply with the code throughout the supply chain. It also includes an opposition to inaction against modern slavery, labour exploitation and human trafficking. Our code makes clear to colleagues the actions and behaviour expected of them when representing us. We strive to maintain the highest standards of colleague conduct and ethical behaviour when operating and managing our supply chain.
- > We are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We work with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of our supplier code of conduct will lead to the termination of the business relationship.
- > engaging with our stakeholders and suppliers to address the risk of any acts of labour exploitation, modern-day slavery or human trafficking in our operations and supply chain
- > reviewing our colleagues working conditions as part of our Risk Assessments and site audits which includes colleague interviews to ensure our colleagues have freedom and security to disclose their situation.

All colleagues have the right to enter into employment voluntarily and should not have to pay to secure a job. If a colleague has been paid to secure a job, then a manager or People Relations should be made notified, and an investigation will take place.

Coercion will not be used to physically confine or imprison colleagues to the workplace or related premises. Practices such as confiscating or withholding identity documents or other valuable items (e.g., work permits, travel documentation and debit and credit cards) are prohibited.

## REMEDIATION

In the event that any acts of labour exploitation, modern-day slavery and human trafficking should be found or alleged in our business or supply chain, we shall follow a specific remediation

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plan. Since the root causes of forced labour are varied, the investigation and corrective actions would be tailored to the circumstances surrounding the case. The process will be overseen by People Relations in conjunction with the Executive Board.

As a minimum, we are committed to performing the following actions in all reported cases:

## *Investigation*

- > Upon receiving information or allegations of any acts of labour exploitation, modern day slavery or human trafficking, People Relations will start an investigation and remediation process

## *Corrective Action*

- > Once a full investigation has been conducted and the concern properly confirmed and understood, we will discuss with the client, service partner or third-party representatives of the business involved and begin the corrective action process in co-operation with the affected facility or supplier.
- > We will also make sure the findings of our investigation are reported or notified in accordance with the relevant laws and report the matter to any appropriate government department or regulatory agency
- > As far as possible, we will ensure victims have the appropriate care and support.
- > Once the root cause analysis process has been satisfied, we will work with the client or service partner to develop sustainable corrective action plans and timelines for execution and will oversee and monitor implementation of those plans.

In the event that a client, service partner or third-party representatives refuse to cooperate, make little or no progress in remediation and/or demonstrate a lack of commitment to the process, this may lead to terminating such relationships.

## **BREACH OF POLICY**

We will take appropriate action if we find that individuals, colleagues or organisations working on our behalf have breached this policy, which may lead to terminating such relationships.

A colleague who breaches this policy may face disciplinary action which could result in dismissal.

## **FREEDOM OF ASSOCIATION**

All colleagues have the right to freedom of peaceful assembly and to freedom of association with others, including the right to form and to join trade unions.

A trade union is an organisation who look after member's interests at work by doing things like:

- > negotiating agreements with employers on pay and conditions
- > discussing big changes like large scale redundancy
- > discussing members' concerns with employers
- > going with members to disciplinary and grievance meetings

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You have the right to:

- > choose to join or not join a union
- > decide to leave or remain a member of a union
- > belong to the union you choose, even if it's not the one we negotiate with on pay, terms and conditions
- > belong to more than one union

We are not allowed to:

- > offer you a benefit to leave a trade union
- > threaten to treat you unfairly if you do not leave a union

We do not operate a union at work, however, any colleague who is a member of a trade union will not be treated unfavourably, will not be discriminated against disciplined, dismissed, or selected for redundancy for exercising that right.

## REPORTING PROCEDURE

We want to keep our colleagues safe from difficult and challenging situations and we want to safeguard victims that are faced with danger. If any colleague has any concern or is aware of any acts of labour exploitation, modern-day slavery and human trafficking, to report either to:

- > A manager
- > People Relations [people@regularcleaning.com](mailto:people@regularcleaning.com)
- > Safecall (anonymous and confidential reporting line 24 hours a day, 7 days a week)  
**0800 915 1571** [WWW.SAFECALL.CO.UK/REPORT](http://WWW.SAFECALL.CO.UK/REPORT)
- > By using the codeword 'ask Monica' and messaging **07385 952 106**

Any matters raised, will be investigated thoroughly, promptly, and confidentially, and the outcome of the investigation reported back to the person who raised the issue.

[Please refer to our Whistleblowing Policy for more information on reporting procedures].

If we identify any acts of labour exploitation, modern-day slavery, and human trafficking within our supply chain, we will take appropriate action in terminating our agreement.

This policy will be reviewed and distributed annually.

**Pauline Carrigan**  
Chair  
20th March 2023

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