

**Modern Slavery ACT 2015**

**Slavery and Human Trafficking Statement**

**INTRODUCTION**

Frocester Security Ltd has a legal duty to prevent illegal working by ensuring that all those employed by the company have the requisite right to work in the UK and therefore prevent modern slavery section 54(1) of the Modern Slavery Act 2015 and comprises our slavery and human trafficking statement.

The purpose of this statement is to ensure the company does not unlawfully discriminate contrary to the Equality Act 2010 when complying with the duty to prevent illegal working, and in particular when carrying out 'right to work' checks when recruiting or employing people and in line section 15 - 25 of the Immigration, Asylum and Nationality Act 2006.

**OUR BUSINESS and STRUCTURE**

Our business is in the design, supply, installation and maintenance of Fire, Security, EV Charging and Data systems for residential, commercial and retail sites throughout the UK and abroad.

We operate out of our main offices in Royal Wootton Bassett, UK, with members of team working out in the field across the territories covered by our works.

**OUR SUPPLY CHAIN**

We have a close relationship with all of our supply chain, whether that be through purchasing of equipment or supply of labour, built up over the years. We have close personal links and contact with the owners, management or directors reflecting the range of small, medium and large enterprises that form our supply chain.

When we acquire new contractor or suppliers, we ensure they follow our QMS document (QCD2202 New Sub Contractor assessment & QCD 2201 New Supplier Approval Form) for due diligence. References are requested from other customers to establish that they are suitable.

To date, we have not been made aware of any human trafficking or slavery activities within the supply chain, and if any such instances should become apparent, we shall act immediately in accordance with moral and legal obligations.

**DUE DILIGENCE PROCESSES**

As part of our initiative to identify risk and mitigate such risks, we nominate representatives of the business to report back at board & management meetings any potential concerns regarding:

- Inappropriate employment practices
- Potential risk areas
- Protection of whistle blowers
- Risks of slavery and human trafficking practices

### **SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS**

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we operate in line with principles of responsible sourcing. We have in place a supply chain compliance programme that is maintained by the relevant account manager or relevant management. This consists of client reviews; audit; and self-certification declarations. All suppliers are reviewed annually.

### **HEALTH and WELLBEING POLICY**

The health and wellbeing of our employees are important. Frocester Security Ltd is committed to providing employees with a safe, healthy and supportive environment at work. We are fully committed to a supportive workplace culture where healthy lifestyle choices are valued and encouraged.

As a group we support:

- Flexible working, appraisals and career development opportunities.
- Social events/activities to encourage positive relationships within the workplace.

### **Right to Work statement**

The company must be satisfied that an applicant has the right to undertake work in UK. This is achieved through comprehensive security screening with includes right to work checks before a person is employed to ensure their immigration status allows them to carry out the work in question.

All new starters are screened in line with BS7858 to ensure they have the right to work in the UK and additionally to work in a security environment. Screening is normally completed before employment commences but will not extend beyond twelve weeks after the start date. Should screening not be completed satisfactorily within twelve weeks of start date the employment will be ceased and the individual dismissed, this is in line with the statement in the job application form.

The process to gathering sufficient information to undertake the screening will also include the information necessary to ascertain the individual's Right to Work in the United Kingdom. For most individuals this will normally that the form of holding of a current or expired UK Passport showing the individual is a British citizen or a citizen of the UK. Where the Passport does not determine the above further measures will be implemented.

All Employees and staff recruitment is subject to Proof of Right to Work and prevention of illegal working. The UK Government checklist Annex A: List of acceptable documents for manual right to work checks issued and updated by the UK Government is used to determine Right to Work.

<https://www.gov.uk/government/publications/right-to-work-checks-employers-guide>

<https://www.gov.uk/government/publications/illegal-working-penalties-codes-of-practice-for-employers/code-of-practice-on-preventing-illegal-working-right-to-work-scheme-for-employers-13-february-2024-accessible>

Where a Temporary Right to Work is held by an employee or prospective employee a review date will be set to obtain a copy of the renewal and therefore the continuation of Right to Work. Should the individual fail to provide continued proof of Right To Work, employment will be ceased with effect from the date of visa expire at the latest. Applicants will not be treated less favourably if they produce acceptable documents showing a time-limited right to work in the UK.

Tom Allerton



Director

Frocester Security Ltd

24 April 2024

## **7. Annex A: Lists of acceptable documents for manual right to work checks**

Where a right to work check has been conducted using the online right to work checking service, the information is provided in real-time directly from Home Office systems and there is no requirement to check any of the documents listed below.

### **List A – acceptable documents to establish a continuous statutory excuse**

1. A passport (current or expired) showing the holder is a British citizen or a citizen of the UK and Colonies having the right of abode in the UK.
2. A passport or passport card (in either case, whether current or expired) showing that the holder is an Irish citizen.
3. A document issued by the Bailiwick of Jersey, the Bailiwick of Guernsey or the Isle of Man, which has been verified as valid by the Home Office Employer Checking Service, showing that the holder has been granted unlimited leave to enter or remain under Appendix EU(J) to the Jersey Immigration Rules, Appendix EU to the Immigration (Bailiwick of Guernsey) Rules 2008 or Appendix EU to the Isle of Man Immigration Rules.
4. A current passport endorsed to show that the holder is exempt from immigration control, is allowed to stay indefinitely in the UK, has the right of abode in the UK, or has no time limit on their stay in the UK.
5. A current Immigration Status Document issued by the Home Office to the holder with an endorsement indicating that the named person is allowed to stay indefinitely in the UK, or has no time limit on their stay in the UK, together with an official document giving the person's permanent National Insurance number and their name issued by a government agency or a previous employer.
6. A birth or adoption certificate issued in the UK, together with an official document giving the person's permanent National Insurance number and their name issued by a government agency or a previous employer<sup>[footnote 3]</sup>.
7. A birth or adoption certificate issued in the Channel Islands, the Isle of Man or Ireland, together with an official document giving the person's permanent National Insurance number and their name issued by a government agency or a previous employer.
8. A certificate of registration or naturalisation as a British citizen, together with an official document giving the person's permanent National Insurance number and their name issued by a government agency or a previous employer.