

## **Solo Service Group Limited**

### **2022/23 Annual Modern Slavery Statement**

#### **Company Commitment**

*Solo Service Group Limited is committed to ensuring that slavery, trafficking, bonded labour, forced or servile marriage, descent-based slavery and domestic work and slavery does not take place in our business or any part of our supply chain by seeking to:*

- *Ensure our recruitment processes are transparent and reviewed regularly, with robust processes in place for the vetting of the appointment of our people*
- *Raise awareness of the issue amongst our people and our suppliers to combat the hidden nature of modern slavery*
- *Challenge and support our suppliers in the effort to drive out modern slavery and human trafficking*

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Solo Service Group's modern slavery and human trafficking policy for the financial year ending 31 July 2023 as approved by the Board of Directors.

#### **Organisational Structure and Supply Chains - Understanding of the Risks**

Solo Service Group was established over 33 years ago. We have grown each year to become one of the largest independent cleaning and support service providers in the UK.

We employ in excess of 3,000 staff across the country, servicing large, diverse, blue-chip customer base, from schools, universities and Police Authorities, NHS to commercial offices and retailers.

We operate in all areas of the UK and the Republic of Ireland. Our head office base is at Swansea which houses the Key administration and support function of the business. Regional operational teams function throughout the UK, led by Operational Directors, Operational Managers and Contract Managers

Our business is dependent on our staff and our suppliers to support the delivery of our services.

Solo Service Group are committed to maintain Customer and Employee wellbeing as a priority, we understand the requirements to focus on people in our business, supply chains and our communities, particularly since the unprecedented Covid-19 pandemic and heightened Modern Slavery, Human trafficking, and Human Right abuse risks as a result. Solo is dedicated to ensure Equality and diversity as part of an overall Sustainable Plan.

As such Solo are committed to the specifications of Section 54(1) of the *Modern Slavery Act 2015* and continues to ensure that modern slavery or human trafficking is not taking place within our operations and supply chain during the financial year that ended close of July 2023.

We fully understand that our service of contract cleaning and employment of cleaning staff is potentially in a higher risk category and such unethical practices can potentially be present in the greater supply chain of our Organisation

### **Assigned Responsibility**

Assigned responsibility for Anti- Slavery initiatives within our organisation lies with Denna Exon – HS Manager.

### **Measures of Prevention – Due Diligence**

Our business is dependent on our staff and our suppliers to support the delivery of our services. We ensure that they can demonstrate compliance with the Modern Slavery Act by working to our Group policies and procedures. As a company predominately offering cleaning and support to our customers, our supply chain is characterised by skilled technical contractors and trades.

As part of our risk-based approach to achieving compliance with the Modern Slavery Act, Solo undertakes due diligence.

The measures we have implemented to date include for: -

We aim to procure under the *Code of Ethics of the Chartered Institute of Purchasing* and the *Welsh Code of Practice for Ethical Employment in Supply Chains*. We understand what details as being Modern Day Slavery and Human trafficking, and the associated risks aligned to such practices Assigned responsibility for Anti- Slavery initiatives within our organisation.

Those suppliers we deem of potential higher risk via our initial screening will be subject to individual Modern Slavery Risk assessments. Results of such assessments are aligned in a Modern Slavery Risk Assessment Process Flowchart and scoring results are banded in a graded traffic light system pass level. A red score defines major risks present, Amber defines minor risks and Green with no risks.

If we establish any evidence of a failure to comply with our policies, or a breach of the Supplier code of conduct, we will in the first instance attempt to highlight the error and work with the Supplier to improve standards and employee welfare. However, we reserve the right to terminate an arrangement with any supplier immediately for appropriate transgressions or where there is no willingness to make improvements. To date there have been no breaches of the Supplier code of conduct, and this is regularly reviewed and monitored with all Suppliers.

Solo Service Group operate and promote on existing and frequently reviewed Modern Slavery, Ethical, Procurement, Whistleblowing, Safeguarding and Corporate Social Responsibility Policies which identify & place measures to mitigate Modern Slavery and Human Right abuse risks

At the start of the Business year August 2022, and later in January 2023 when reviewing all relevant policies, we reviewed our Action Plan for continued Modern Slavery and Ethical protocol conformity, which is effective and will be reviewed up until end of our business year in July 2023. The plan outlines our strategy to continue, review and further enhance on implemented processes and assessments to establish if any, modern day slavery, and human right abuses within Solo and in

its greater supply chain exist or have the potential, with the overall objective to mitigate any such unethical activity and/or prevent it completely.

The action plan outlined the following steps to be undertaken: -

- Continued training throughout the group to further create greater awareness and enhance knowledge and understanding of Modern Slavery, including ongoing Awareness Raising programmes via Toolbox Talks and the Website.
- Appoint a Procurement Officer to manage and direct all purchasing of all goods, service and relationships from all Suppliers. Review and agree specifications and contractual requirements This includes to manage the performance, due diligence and cost effectiveness.
- Reviews on current modern slavery risk assessment for potential higher risk suppliers
- Further assessment of current Supplier Due Diligence with potential proposed measures (including Training) to eliminate and reduce risks with ongoing engagement to identify and address potential exploitation risks.
- Continued modern slavery controls in our responsible sustainable procurement plan as part of a continuous overall sustainable procurement approach and in line with our Corporate Social Responsibility and Social Value platform/portal and agreed Social Value commitments.
- Production of a transparent Annual Modern Slavery statement outlining the actions undertaken to report on due diligence for our business and its supply chain.

In addition to the above, Solo's internal risk of potential exploitation is further reduced by the following internal controls: -

- We do not outsource labour via Agencies and have full control over the recruitment of our employees.
- All new recruits are subject to employee checks under the requirements of the Home office.
- Our payroll are trained to highlight any suspicious activity.
- We undertake basic Vetting checks on employees in working environments where it is deemed necessary
- Enhanced vetting checks are undertaken in work environments that present the potential of greater risks
- No unfair employment practices, such as zero hours contracts.
- Supporting Trade Union representation of our staff
- Recognition of TUPE regulations and the rights of individuals.
- There is accountability at all levels within the business by operating to various International standards and the maintenance of legal registers and compliance, and there are designated responsibilities, procedures, and audits to ensure this conformity. This also includes for the management of all potential risks exposed by the work to be undertaken at varying customer environments.
- Training, awareness to all cleaning teams and operatives. including Operational Management familiarity with observing for the signs and indications of possible modern slavery practices.

- Helpdesk logging system and escalation procedure for all Customers, employees and the general public

### **Relevant Policies & procedures**

**Modern Slavery & Human Trafficking Policy** – reiterating our stance against all forms of modern slavery, the policy outlines procedures and processes which are designed to guard against the occurrence of Modern Slavery or Human trafficking in our business operations and supply chain .

**Procurement Policy** – outlines due process for procurement of goods and services. A questionnaire is used to assess whether an organisation satisfies minimum levels of economic and financial standing and technical capability.

**Whistleblowing Policy** – encourages Solo’s people to raise any concerns related to the direct activities or the supply of chains of the company without fear of reprisals. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.

**Recruitment & Selection Policy** – Ensuring fair and meticulous candidate selection process and hence preventing any forced labour and guaranteeing safe, ethical working conditions. In addition completely eliminating risk from any outsourced recruitment agencies

**Equality and Diversity Policy** – this reaffirms our core values and commitment to equality, diversity, inclusion and human rights, hence strengthen our approach to treat people with respect, dignity and fairness and challenge any discrimination, harassment and victimisation prejudice.

**Safeguarding Policy** – ensures all persons in conjunction with the provision of Solo Service Group services are not harmed in any way via the organisations actions. The policy promotes an understanding and awareness of Safeguarding with our people and customer. It also covers the process for raising concerns about possible abuse or neglect by a staff member or any other person.

### **Overview of Training**

There is a clear Training and Development programme within Solo and associated procedures in operation that places focus upon enhancing a skilled labour force.

An Action Plan was initially produced in 2021 to develop and expand on our measures which included for a national drive for training throughout the organisation. This action has continued throughout the 2022 to 2023 business year, and will for another few years , due to the amount of staff we have assigned to other varying customer locations and new staff who are automatically subject to this training.

Areas have been identified and targeted for training for all new and existing Solo staff regarding modern slavery issues and directly making employees aware of modern slavery indicators and how to report. To date within this business year, we have covered training for 1347 existing and new employees on varying contracts throughout the U.K

This training and awareness of modern slavery continues as an ongoing action, throughout the Group and we anticipate it will be a steady process to train throughout the existing staff base, in addition to training all new staff.

All new employees have received the updated training from the onset at the induction period.

Modern Slavery Training has also been undertaken internally with all identified potential at risk suppliers.

### **Our approach for continued improvement**

Over the coming years we strategically aim to have a broader positioning of our service as part of an approach to recognise our total societal impact and how we can drive positive change and measure our effectiveness. We are committed to responsible and sustainable provision of service and procurement in our overall long- term plan.

In the shorter upcoming 12-month term we aim to ensure the following: -

- Updating a Supplier code of conduct/contract terms and internal procedures to ensure they are applied to our continuous everyday procurement activities. Solo will insist on ethical standards by our suppliers. Suppliers are required to conform that they provide safe working environments, treat workers with dignity and respect, and act ethically and within legal constraints in their use of labour. The Supplier/Sub contractor questionnaire is in the process to include for this.
- Employment of a full time Supplier Liaison/Procurement officer to manage co-ordinating responsibilities of Suppliers/ Sub contractors from Health and Safety
- Review and enhance monitoring of supplier assessments
- Introduction of new Terms and Conditions for Suppliers
- Managed review of internal procurement policies, procedures and guidelines
- Risk categorisation on all suppliers and contractors, including planned audits with significant spend strategic vendors and or 'at risk' vendors.
- Continuation of internal Modern Slavery Training.

***This statement has been approved by the Managing Director of Solo Service Group***

***Caroline Cooper BA(Hons)***  
***Managing Director Solo Service Group***

***16<sup>th</sup> October 2023***