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 2023/24.



April 2023

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 and 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 2022/23 we continued to face the impacts of the Covid-19 global pandemic and Brexit; it was therefore essential that we continued to consider the impact these factors had on Modern Slavery and our response to this within our business and supply chain. We have utilised our continued relationship with Slave Free Alliance, Hope for Justice and the Indirect Procurement Human Rights (IPHR) forum to evaluate new impacts and relevant actions. These groups provide knowledge and resources to give us the tools we need to identify the risk of modern slavery and then put in place appropriate control measures. We look forward to continuing our work with them and to further develop our existing internal processes as a result.

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 compliance mechanisms.

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

- Engaged
- Innovative
- Trusted
- Integrated
- Responsible
- Passionate

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 Solutions (Recruitment) Limited (SSR) is a partnership driven outsourced labour solution, providing innovative workforce solutions for industries across the UK and Europe.

In order to deliver the highest level of expertise for our clients, the SSR comprises of 3 Divisions, each with sector specialists working hard to ensure the highest level of service: -

- Environmental Support Services – delivers a fully outsourced labour solution to the Waste and Recycling sector.
- Smart Workforce Solutions – encompasses a branch network and on-site managed services provision which covers a broad range of specialisms, similar to a high street recruitment model
- European Operations – recruitment services within Europe including Poland, Romania, Slovakia, Netherlands and Denmark.

Legislation

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 recognises 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 flexible 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 Prior 12 months

Governance

Delivery of modern slavery prevention practices at Smart is led by Jade Oliver-Morris, HR & Shared Services Director. Overall responsibility sits with the Smart Solutions CEO, who receives regular progress reports, as does the Senior Management Team.

During Anti-Slavery Week in October 2022, SSR pledged its commitment to IPHR's Waste and Recycling Modern Slavery Protocol. SSR was instrumental in the creation of this protocol and is proud stand alongside other businesses in the Waste sector in the fight against Modern Slavery. We also continued to educate our

employees on ways in which new immigration laws are impacting modern slavery and appropriate steps to help us remain vigilant. Although Anti-Slavery practices are a continuous focus, it is important for the business to recognise these occasions, to spread awareness and share good practice. We also continued to use social media to promote business action as well as contributing to the wider industry response to threat.

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 its 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 several 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 groups/organisations: -

Indirect Procurement Human Rights Forum Waste & Recycling Working Group

The Indirect Procurement Human Rights (IPHR) Forum is a group of UK retailers, brands and manufacturers. We have a common vision to protect and respect human rights in our goods and services not for resale supply chains and facilitate collaborative responses to shared risks.

The IPHR Forum Waste & Recycling Working Group was formed to enable the IPHR Forum to increase and prioritise activity to address human rights issues in the waste & recycling sector.

The Working Group includes IPHR Steering Group members in addition to stakeholders with interests in human rights in the waste & recycling sector, including waste service providers, NGOs and Governmental bodies. Our vision is that through collaboration, we will drive positive change to improve the human rights of workers in waste & recycling supply chains.

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 collaborate 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 in its supply chain. Smart has made changes to its supplier management processes, including the introduction of a Suppliers Code of Conduct in mid-2021 and a re-writing of its Supplier Evaluation Questionnaire, with specific detailed focus on anti-Modern Slavery practices designed to assist us in supporting and working closely with our supply chain partners to achieve this aim.

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 its 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 demonstrated in the following documents: -

- Hidden Labour Exploitation Policy
- Supplier 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 can encompass insight into specific gangs, local intelligence and operations.

All temporary employees are trained during induction on how to spot the signs. An audit mechanism is also in place to ensure consistency and compliance.

Various marketing techniques 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 24/7 Confidential Helpline.

For Smart's supply chain partners, the 'Supplier Guide to Modern Slavery' is communicated during the evaluation process as part of requests for information. All 2nd tier agency suppliers are audited weekly and training and support is provided where 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.

In 2022, Smart supported Ride for Freedom to raise funds for their Freewheel Hub programme. Members of our Environmental Support Services, in collaboration with Smart's Client, Biffa, cycled around Birmingham, the location of the Hub. Ride for Freedom's mission is to harness the universal appeal of cycling to raise awareness, educate and forge partnerships to end modern slavery, and to provide remedy to survivors through its operational Freewheel programme.

Reporting

Smart collates data on all suspect information including known associate information. Smart's weekly reporting from its personnel database to identify duplicates of bank account details, addresses and next of kin information has been upgraded and anything suspicious is investigated accordingly. Smart also holds a database of information collated through work with Police forces and Hope for Justice. Weekly reports identify changes or additions to personnel records that match this data. Full internal investigations are conducted on any data hit.

Next Steps and Targets

Throughout the coming year, Smart will be focussing on post-pandemic and post-Brexit evolutions to the threat of Modern Slavery together with continuing 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 harness the energy and commitment of our staff as we proceed on our journey, including our "Modern Slavery Champions' who in addition to undergoing advanced training in Modern Slavery, will act as the regional focus for our initiatives as well as a key information sharing network internally and with key clients.

Employees who have had training strongly support our commitment to develop processes to prevent any instances of modern slavery in our organisation. Once the role is bedded into the organisation, opportunities for expanding the initiative into the other divisions are to be considered.

We will continue to 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 actions and Goals

Completed Action 2021/2022	To Complete 2022/2023
Auditing of second tier agency supply chain with support from SFA, including feeding back on areas where improvement is required.	Implement auditing of wider supplier portfolio, above and beyond 2nd tier agencies. as well as
Worked with Hope for Justice as a key corporate partner by nominating them as one of our charity partners for 2022. This further strengthened the engagement and development of staff involvement with the charity.	Review the current supplier onboarding process and implement auditing.
Ride for Freedom	Continuation of working with Hope for Justice as a key corporate partner. This will further strengthen the engagement and development of staff involvement with the charity.
Embedded the role of "Modern Slavery Champions" as key source of knowledge and networking on Modern Slavery wherever relevant in the wider Smart Solutions Group.	Creation of a Modern Slavery Standard along with Employee and Manager Guide.
Contributed to industry specific initiatives – including creation of the IPHR Waste & Recycling Working Group's Modern Slavery Protocol	Enhance IT reports to encompass 2nd tier agency worker data covering duplicate reporting and suspect information.
	Review the role of Modern Slavery Champions to ensure positions stay relevant and effective.
	Implement overarching site/office standards, train staff and deploy auditing team throughout the year.
	Formulation of a collective ESG policy and strategy.

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The statement was approved by the Smart Solutions (Recruitment) Limited CEO on 31st March 2023.

Robert Webb
Chief Executive Officer
Smart Solutions (Recruitment) Limited