**MODERN SLAVERY STATEMENT**

**A) ORGANISATION**

This statement applies to Nationwide Cleaning & Support Services Ltd(referred to in this statement as ‘the Organisation’).

**B) ORGANISATIONAL STRUCTURE**

Nationwide Cleaning & Support Services have one Head Office. The main activities carried out by the organisation is providing cleaning and shunting services to the transport sector and cleaning services to commercial offices based solely within the United Kingdom. Our employees complete their contractual job duties on our client’s premises within the United Kingdom.

**C) DEFINITIONS**

The Company considers that modern slavery encompasses:

* Human trafficking;
* Forced work, through mental or physical threat;
* Being owned or controlled by an employer through mental or physical abuse of the threat of abuse;
* Being dehumanised, treated as a commodity or being bought or sold as property;
* Being physically constrained or to have restriction placed on freedom of movement.

**D) COMMITMENT**

Nationwide Cleaning & Support Servicesacknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. Nationwide Cleaning & Support Services understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

**E) SUPPLY CHAINS**

In order to fulfil its activities, Nationwide Cleaning & Support Services’main supply chains include those related to supplying chemicals, sub contracted services and environmental contract services.

Nationwide Cleaning & Support Servicesdoes not enter into business with any other organisation, in the United Kingdom, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to Nationwide Cleaning & Support Services in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Company strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom*.*

**F) POTENTIAL EXPOSURE**

In general, Nationwide Cleaning & Support Servicesconsiders its exposure to slavery/human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

**G) STEPS**

Nationwide Cleaning & Support Services carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

Nationwide Cleaning & Support Services has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, Nationwide Cleaning & Support Services has taken the following steps to ensure that modern slavery is not taking place:

* The Company continues to ensure that it complies with all applicable laws in the areas in which we are based. The Company always pays the minimum wage or above as stated by Government Legislation in the UK.
* The company will not offer Zero hour contracts.
* The Company is taking steps in reviewing supplier contracts to state the Company is committed to ensuring there is no modern slavery or human trafficking. In the event of any supplier being suspected or being involved in modern slavery, our supplier contracts will be terminated.
* This policy will be accessible on our Staff Portal for all employees and clients to view.

**Contract Management**

Modern slavery is an issue that requires continuous focus and improvement and is reliant on effective supplier relationship management. Positive, proactive and collaborative engagement with our suppliers will encourage transparency and is critical to incentivise suppliers to flag issues as they arise.

**a) Monitoring**

* Supplier Meetings

Supplier will be asked for information relating to modern slavery issues and to provide assurance on the processes in place to identify and address modern slavery risks in their supply chains.

This will be done through annual contract management meetings where the supplier can provide detailed updates on how they are meeting legislative and contractual requirements including, where relevant, assurance of legal compliance with the Modern Slavery Act and production of a high quality Modern Slavery Statement in line with Home Office guidance. At these meetings, actions plans will be put in place where there are suspected and confirmed instances of modern slavery to detail how these will be addressed.

This level of engagement will continue throughout the life of the contract; the frequency will depend on the level of risk and length of the contract. Key Performance Indicators

(KPIs)

Close contract management of high risk agreements, combined with use of key performance indicators (KPIs) should reduce the likelihood of modern slavery occurring in supply chains. We will ensure suppliers re-visit their modern slavery policies and practices year on year and are motivated to continue identifying and managing supply chain risks throughout the life of the contract.

**Audits**

Audits will be conducted annually.

Details of the types of audits and considerations to take into account when conducting one are at Annex B.

However, as modern slavery is usually hidden and risks in relation to modern slavery can be complex, conducting an audit will not guarantee that issues and risks will surface at the time. We will therefore combine an audit with intelligence from a variety of sources such as trade unions, researchers or experts that have closer relationships with vulnerable workers.

Audits will be used as one of a number of approaches to monitor suppliers activity on contracts, and they are not a substitute for long-term, open and collaborative relationships with key suppliers.

b) Working with suppliers to mitigate risks

We encourage our suppliers to be proactive and open, and report risks of modern slavery as they come to light. Responses to the Modern Slavery Assessment Tool may also indicate risk areas that need to be addressed.

When a risk has been identified, an action plan setting out the behaviours, standards and actions required of both parties is required to address the issues. We will clearly set out what action will be taken, when and by whom including deadline dates, milestones and targets, and what preventative measures the supplier will put in place to stop recurrence. We will keep in regular contact with the supplier to assess progress against the plan, but also to ensure the supplier is accepting their responsibility. Any actions taken should be victim-centric, focused on providing the best outcome for the victims, particularly where children are involved.

c) **Termination**

Taking immediate action to terminate a contract can have a drastic effect and risks causing further harm to those involved. Even if a supplier is suspected of being complicit in the crime, the priority should be to work closely with the supplier to help the victims and ensure it does not happen again. Reactive contract termination can lead to fear and concealment by suppliers, which in turn puts victims at greater risk. Maintaining transparency of the issues and risks is important and working with suppliers offers the best chance of helping victims and preventing re-occurrence.

Suppliers that fail to comply with our Modern Slavery Policy will be terminated.

**Annex B**

Supplier Audits: Points to Consider

Audits will apply assurance and verification of the suppliers’ own assessments. Social audits will give an insight to working conditions and identify issues in supply chains, particularly when they are un-announced so it is more difficult for perpetrators to cover up any exploitation. Social audits will be conducted internally, however if an internal audit is conducted, it must be carried out by competent persons who are in a position to be impartial, objective and free from direct responsibility for the activity being audited. For this reason, they are to be members of a different department or location.

Factory audits will identify how goods are being produced and provide a snapshot in time of the standards and conditions in a particular factory at the time of the audit, and assist in the systematic gathering of information. It is an important activity to gain knowledge of the process and understand what works well and what is less successful.

We will carry out annual audits of service industries where low-pay is prevalent, such as cleaning or security services.

Suppliers’ recruitment practices will be audited, especially those that employ third parties to recruit workers and where workers are paid through a third party. Employee information will also be audited to look for signs of modern slavery - such as large numbers of workers resident at the same address, or with sequential bank account numbers.

There are a number of factors that we will consider before carrying out an assessment, these include:

* The chosen assessor should not have any links with the supplier and whether they will be required to engage with workers directly - especially those that are most vulnerable i.e. young workers, pregnant employees, migrant workers - at supplier companies
* The aspects for the auditor to focus on e.g. recruitment processes, working conditions, working hours, health and safety, conditions for young workers, level of wages being paid, treatment of workers etc. Ideally these should reflect any issues that you identified through the risk assessment process, including the initial operating context mapping and engagement with expert stakeholders
* Whether a spot check will result in a more accurate audit than a planned check
* The documentation the auditor will be reviewing and the willingness of the supplier to provide it; whether the information can be verified by other stakeholders/third parties
* If the auditor needs to visit the supplier’s site(s) or whether a desk-based audit be sufficient
* If carrying out an on-site visit, to ensure it is the main site and not a ‘show site’
* Where the supplier is based abroad, if the auditor is aware of the local laws and customs
* If the auditor is able to carry out identity checks on workers, ensuring that the workers on-site are those listed as staff by the supplier. (Auditors must be able to select the workers to be interviewed rather than be provided with those the employer wants to present)
* If the auditor can communicate with the workers in their own language / if an interpreter is needed. Ideally, the auditor should be based in the country where the audit is taking place, be familiar with cultural norms and able to speak the language as this will help build trust with employees
* Whether the auditor can speak with workers confidentially, possibly off-site
* Whether the auditor is able to request / receive anonymous reports. It should also be made clear during the engagement with an auditor that any indication of modern slavery must be reported to the appropriate authorities. Failure to do so can allow the perpetrators to continue, the crime to remain hidden and, most importantly, victims to be denied access to the support they need and face continued abuse
* Whether there is a recognised pattern of organisations presenting fraudulent records to auditors in the relevant location or sector



Signed:

Gary Nourse

Director

1st April 2025