



Modern Day Slavery Policy

Introduction

This statement sets out Bridgegate Security actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the current financial year.

As part of the security industry, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

This statement covers the activities of Bridgegate Security:

As a recognised national brand, Bridgegate Security provides and supports security services Nationally. As a leading Security Company for both home and business, we understand the importance of balancing Home Security devices so that your loved ones are constantly safe and well protected.

At Bridgegate Security we understand the expectancy of our business clients and the value of providing a high quality professional service that is tailored to the businesses requirements. Our clients see the importance of continuity with a firm they can trust to protect their interests.

Protecting our schools, the Government Health sector and public spaces, Bridgegate Security serve our country, creating the highest levels of Security for your protection.

We combine all Security Services to match your personal or business needs, from CCTV, Intruder Alarms, Key Holding, Mobile Patrols, Alarm Response, Security Guards, Static Security, Manned Guarding, Retail Security, Construction Site Security and Door Supervision.

The organisation currently operates throughout the UK.

The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

We undertake an annual risk assessment to review our processes are at high risk. There are currently no areas considered high risk.

Responsibility

Responsibility for the organisation's anti-slavery initiatives is as follows:

The Managing Director is responsible for putting in place and reviewing the following items alongside the retained Group Head of Risk and Compliance Manager:

- Policies and the process
- Risk assessments
- Investigations/due diligence
- Training

Relevant policies

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations

- **Whistleblowing policy:** The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can complete our confidential disclosure form.
- **Employee code of conduct:** The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Supplier/Procurement code of conduct:** The organisation is committed to ensuring that its 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. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.
- **Recruitment/Agency workers policy:** The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

Due Diligence

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier;
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- conducting supplier audits or assessments;
- creating an annual risk profile for each supplier;
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers through third party auditor and requiring them to implement action plans;
- participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular;
- using a database, where suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular; and
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship

Performance indicators

The organisation has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the organisation is:

- requiring all staff to have completed training on modern slavery by end of 2016
- developing a system for supply chain verification in place by the end of 2016 whereby the organisation evaluates potential suppliers before they enter the supply chain; and
- Reviewing its existing supply chains expected to be complete by the end of 2016, whereby the organisation evaluates all existing suppliers.

Training

The organisation requires all staff within the organisation to complete training on modern slavery. The organisation requires all staff to attend toolbox talks, the organisation's modern slavery training covers:

- our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;

- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters Licensing Authority and “Stronger together” initiative;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation’s supply chains.

Awareness-raising programme

As well as training staff, the organisation has raised awareness of modern slavery issues by conducting toolbox talks with staff.

The toolbox talks explain to staff:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- What external help is available, for example through the Modern Slavery Helpline.

