

Sovereign Industrial Services Ltd

Modern Slavery &

Illegal Workers Policy

**Approved by:** Abdul Mumuni

**Job Role:** Director

**Signed:** *Abdul Mumuni*

**Date:**

**This policy must be reviewed by the following date:** Jan 10, 2025

<b>Company Name:</b>	Sovereign Industrial Services Ltd
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<b>Review Date:</b>	Jan 10, 2025

## Introduction

This Modern Slavery and Illegal Workers Policy relates to actions and activities during the current year and shall be reviewed on or before Jan 10, 2025.

The statement sets out Sovereign Industrial Services Ltd’s commitment to compliance with the Modern Slavery Act 2015 and our commitment to preventing slavery, human trafficking and illegal workers in our business activities. This policy also details the steps we have put in place with the aim of ensuring that there is no slavery, human trafficking or illegal workers in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

## Organisational Structure and supply chains

This statement covers the business activities of Sovereign Industrial Services Ltd which are as follows:

We are an industrial coating/painting company for the Local Authorities, Highways, Rail, Marine, Oil and Gas.

Some of the assets we work on include bridge, gantry, pipeline, culverts, tank and concrete/brickwall.

The Company currently operates in the following countries:

- United Kingdom

## Training

To ensure a good understanding of the risks of modern slavery, human trafficking and illegal workers in our business and supply chains, the Company requires all employees to attend a short training presentation where the company modern slavery training presentation is delivered within the first 2 months of employment.

## Policy

Sovereign Industrial Services Ltd is committed to ensuring that there is no modern slavery, human trafficking or illegal workers in our business or our supply chains. This Statement affirms our intention to act ethically in our business relationships.

## Illegal Workers

Sovereign Industrial Services Ltd carry out appropriate VISA, Passport and DOB checks to ensure all current and potential employees are entitled to work in the UK in accordance with Sections 15 to 25 of the Immigration, Asylum & Nationality Act 2006. Should a non-EU resident apply to work with us, as identified by pre-employment screening questions, a copy of their work visa and passport would be required. All necessary checks would then be made to ensure the person had the right to work in the UK and they have no immigration restrictions that prevent them from doing the work in question.

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All documentation used by Sovereign Industrial Services Ltd to verify the right to work of any current or potential employee shall comply with guidance on [preventing illegal working](#) issued by the Home Office.

Should a potential employees' right to work in the UK be on a temporary basis, additional checks will be carried out to ensure that their documents have been renewed prior to them commencing employment to prevent a situation where their working rights would expire during their period of employment.

All related verified documentation is retained for a minimum of 2 years after the individual has ceased employment with Sovereign Industrial Services Ltd.

## Due Diligence Processes for Slavery and Human Trafficking

Sovereign Industrial Services Ltd undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence process includes the building of long-standing relationships with suppliers and making clear our expectations of business partners, evaluating the modern slavery and human trafficking risks of each new supplier &/or invoking sanctions against suppliers that fail to improve their performance in line with an action plan provided by us, including the termination of the business relationship.

Employers are required under the Health and Safety at Work Act to provide their workforce with the information necessary to ensure, as far as reasonably practicable, their health and safety at work.

## Non-English Speaking Personnel

Non-English-speaking labour can comprise many occupations and trades - Sovereign Industrial Services Ltd have split this into the following categories.

**Specialist international contractors:** Equipment is often procured internationally. Contracts will often require international installation teams. It is common for only a few members of the team to speak English.

**Tradesmen:** Trades, typically supply chain, may comprise non-English speaking operatives, e.g. electricians and dry liners.

**Unskilled Labour:** Non-English-speaking workers will often be employed in unskilled positions on site. In many cases, these individuals will be contracted to Sovereign Industrial Services Ltd on a labour-only basis as well as our supply chain. These will typically include security operatives and cleaners.

It is difficult to categorise the level of English language that individuals possess. This document concentrates on operatives who have very limited English, including those who do not understand written English and who would not understand the basic elements of a site induction. Although this may not put individuals in danger directly, it may lead to an accident on-site if a misunderstanding takes place.

Regulation 10 of the Management of Health and Safety at Work Regulations requires the provision of information for employees, which is comprehensible and relevant, i.e. capable of being understood by the person for whom it is

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intended. This is supported by an Approved Code of Practice, “Management of Health and Safety at Work”, which states that:

- The information provided should be pitched appropriately, given the level of training, knowledge and experience of the employee.
- It should be provided in a form that takes account of any language difficulties or disabilities.

For employees with little or no understanding of English, or who cannot read English, Sovereign Industrial Services Ltd may need to make special arrangements. providing translations, such as using interpreters, or replacing written notices with clearly

Policy Review

This Modern Slavery and Illegal Workers Policy will be reviewed at regular intervals, updated as necessary and no later than the date in the footer of this document. The Company Director endorses this policy statement and is fully committed to its implementation.

Sign Off & Approval

Approved by: Abdul Mumuni

Job Role: Director

Signed: *Abdul Mumuni*

Date:

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