



COMPANY POLICY

Modern Slavery and Human Trafficking Policy

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Our commitment

Grant's Cleaning Services has zero tolerance for modern slavery, human trafficking, forced labour, servitude and child labour. We are committed to acting ethically, transparently and responsibly in our own operations and supply relationships.

1. Purpose and scope

This policy sets out the standards expected of directors, employees, workers, agency staff, contractors, suppliers and other business partners. It applies to recruitment, employment, purchasing, subcontracting and the delivery of cleaning services at every customer site.

2. Legal and ethical framework

We support the principles of the Modern Slavery Act 2015 and related UK employment and human-rights protections. Where the statutory turnover threshold for a section 54 transparency statement does not apply to the company, we follow these commitments voluntarily as responsible business practice.

3. Our operating context and risks

Commercial cleaning can involve labour-intensive work, work outside normal office hours, temporary labour, subcontracting and supplies sourced through several tiers. These factors can increase vulnerability if recruitment, working conditions or supply chains are not properly controlled.

- Recruitment fees, withheld identity documents or misleading terms of employment.
- Coercion, intimidation, restriction of movement, debt bondage or unlawful deductions.
- Excessive or involuntary working hours, underpayment, or accommodation linked to coercion.
- Unexplained labour supplied through intermediaries or suppliers unwilling to provide basic assurance.
- Products or materials sourced from sectors or locations known to carry heightened labour-rights risks.

4. Employment and recruitment controls

- Workers are engaged through fair and transparent recruitment processes and receive understandable written terms.
- No worker should pay a recruitment fee to obtain work with us, and no identity document may be retained as a condition of employment.
- Eligibility to work checks are completed lawfully and records are handled securely.
- Pay, working time, holidays and deductions must comply with applicable law and contractual terms.
- Workers remain free to leave employment in accordance with their contract and the law.
- Managers should be alert to signs of coercion or exploitation and must escalate concerns promptly.

5. Suppliers and contractors

We expect suppliers and contractors to share our standards. Our proportionate checks may include confirming business identity, labour arrangements, recruitment practices, right-to-work controls and acceptance of this policy.



Higher-risk or unexplained arrangements may require further evidence, corrective action, suspension or termination of the relationship.

6. Reporting concerns and protection

Anyone who suspects exploitation, coercion or another breach should report it immediately to the Managing Director by telephone or email. Concerns may also be raised through the company grievance or whistleblowing route. Reports will be handled sensitively and, as far as practicable, confidentially. No person will suffer retaliation for raising a genuine concern in good faith.

If someone appears to be in immediate danger, contact the emergency services. The company will cooperate with relevant authorities and specialist agencies where appropriate.

7. Investigation and remedy

We will assess and investigate concerns promptly, preserve relevant information and take proportionate action. This may include safeguarding affected people, correcting employment practices, requiring supplier remediation, ending a relationship, disciplinary action or referral to authorities. Our priority is to avoid increasing risk to a potential victim.

8. Training, monitoring and review

Relevant managers will receive proportionate awareness guidance. The Managing Director will review reported concerns, supplier issues and the effectiveness of controls at least annually. Lessons identified will be reflected in recruitment, procurement, training and future policy updates.

Approval and document control

This policy is approved on behalf of Grant's Supplies Limited T/A Grant's Cleaning Services and will be reviewed annually, or earlier if legislation, guidance or business operations change.

Approved by	J G Smith
Position	Managing Director
Signature	Electronically signed by J G Smith
Date	5 September 2026