Anti Slavery and Human Trafficking Policy

Full policy | POL-08 | Version 2026.10.23

Reviewed and approved 23 October 2026 | Approved by the Managing Director

Prevent exploitation in our workforce, contractor teams and supply chain, and respond safely when a concern is raised.

1 Commitment and scope

Soniclean (South Yorkshire) Limited, company number 08539358, prohibits slavery, servitude, forced or compulsory labour, human trafficking and unlawful child labour. Work must be freely chosen and people must be treated with dignity.

Our contractor-based delivery model makes labour-supply controls especially important during seasonal peaks. This policy applies to our own operations and the supply chains connected to our work. We require suppliers and contractors to apply equivalent standards to their own workers and relevant suppliers.

2 Responsibilities

The directors have overall responsibility. The Managing Director controls the policy, risk review and records. The Operations Director oversees contractor and supplier checks, site briefings and immediate operational action. Supervisors must know how to report concerns and make that route understandable to their teams.

Everyone working for us must avoid participation in exploitation and raise a reasonable concern promptly. A person does not need to establish proof before reporting. A concern involving either director can be reported to the other or directly to the appropriate external authority.

3 Minimum labour standards

Workers must receive understandable terms and lawful pay, with legitimate deductions and the freedom to leave in accordance with lawful notice arrangements. They must retain control of their identity documents and have access to their own earnings. No recruitment fees or coercive debt may be imposed on workers for obtaining Soniclean work.

No person may be threatened, confined, deceived about the nature of work or compelled to work through threats against them or their family. Children must not perform unlawful work. Any work by a young person must comply with age, education, hours and safety requirements.

A contractor must not use undisclosed labour providers or substitute an unapproved business without the required approval. Immigration or right-to-work checks must be lawful, consistent and non-discriminatory; they do not replace checks for exploitation.

4 Risk assessment and supplier checks

The directors review risks before engaging a new contractor, where the supply arrangement changes and at annual management review. Consider seasonal recruitment, agency chains, recruitment practices, prices that appear unable to support lawful pay, geographic or product risks and information about prior concerns.

Use OP-CON to identify the actual employer or labour provider and the businesses in the relevant delivery chain. Ask about recruitment fees, payment arrangements, right-to-work processes, worker terms and reporting routes in proportion to the risk. Require explanations and corrective action where information is incomplete or inconsistent.

Do not rely solely on a supplier signing a policy. Where risk warrants it, review supporting evidence or speak privately with workers in a safe and accessible way. Record the checks, the decision and any conditions. Do not collect unnecessary identity or sensitive information.

5 Recognising and reporting concerns

Warning signs can include a person being controlled by someone else, inability to speak freely, identity documents or wages being withheld, coercive debt, threats, unsafe accommodation tied to work or unexplained transport and movement restrictions. A single sign is not proof; assess the context without stereotyping.

In immediate danger call 999. Otherwise report privately to a director, the police or an appropriate safeguarding authority. Do not confront a suspected exploiter, alert others unnecessarily, attempt a rescue yourself or investigate beyond your role.

Listen without pressure and record factual information already available, including the person's own words where useful. Explain who may need to receive the information. Do not promise absolute confidentiality or an outcome that Soniclean cannot control.

6 Responding and remedy

The receiving director prioritises safety, obtains specialist advice where needed and coordinates a proportionate response with the appropriate authorities. Restrict access to the record. Consider safe changes to the work or supplier arrangement that do not expose the affected person to retaliation or loss of essential support.

Where a supplier breach is confirmed, consider corrective action, monitoring, suspension or termination, taking account of the safety and welfare of affected people. A relationship must not continue in a way that knowingly enables exploitation. Decisions and reasons must be recorded.

No person will suffer detriment for raising a reasonable concern or refusing exploitation, even if the concern is not substantiated. Suspected retaliation must be reported and investigated separately. Employee action follows a fair disciplinary process; contractor action follows the applicable agreement and law.

7 Training records and review

Explain the policy and reporting route in induction and relevant contractor briefings. Provide additional practical guidance to people recruiting workers, selecting contractors or supervising seasonal teams. Check understanding, including language and accessibility needs.

Maintain checks, training and actions within the existing QMS records. Sensitive case material is restricted and is not posted in general site chats. Apply the record-category periods in QM-01 section 9.4 and a documented legal or safeguarding hold when necessary.

At annual management review, consider supplier checks, concerns, lessons, training and the effectiveness of remedies. Do not claim that our business or supply chain is guaranteed slavery-free.

8 Policy and annual statutory statement

This is an operational policy, not an annual statement of steps taken for a financial year. The directors assess each year whether section 54 of the Modern Slavery Act 2015 requires a statement, including the applicable turnover and business tests. If required, produce a separate statement describing actual activity, obtain the necessary board approval and director sign-off, and publish it with the required homepage link. Do not use this policy or its public summary as a substitute.

Policy enquiries: compliance@soniclean.co.uk | 0114 437 2337

Reviewed and approved by the Managing Director on 23 October 2026.

Next review 23 October 2027, or earlier if the law, risks or working arrangements change.