

## Modern Slavery & Human Trafficking Policy

### Financial year 2019-20

#### Introduction

This statement is made pursuant to section S4 (1) of The Modern Slavery Act 2015 and constitutes Profile Security Services Ltd slavery and human trafficking statement for the financial year ending September 2020.

Modern Slavery is a term used to encapsulate two offences in the Modern Slavery Act 2015:

- Slavery, servitude and forced or compulsory labour
- Human trafficking

We have a responsibility to ensure that workers are not being exploited, that they are safe and that relevant employment, health and safety, human rights laws and international standards are adhered to, including freedom of movement and communications. We are committed to improving our practices to combat slavery and human trafficking.

#### Organisational Structure and Supply Chains

This statement covers the activities of Profile Security Services Limited:

- Profile Security Services Limited is an independent security company specialising in security services of customer facilities. The Company was founded in 1980
- Profile Security Services Limited develops partnerships with its clients, understanding their security needs and strategy. This enables the Company to provide an individual service to meet the client's needs and expectations
- Profile Security Services Limited provides specialist services within the provision of security consultancy, training, security guarding and door supervision, mobile patrols, client key holding and CCTV surveillance
- The company's workforce is employed on a permanent contractual basis. All right to work, residency, Security Industry Authority and employment history verification checks are conducted in accordance with the Immigration, Asylum and Nationality Act 2006, BS7858 standards and SIA requirements

*Profile Security sets itself the highest standards. As a mark of excellence, it also meets national and international benchmarks:*

- Profile's Quality Management Systems (QMS) are ISO 9001:2015 certified.
- Our Environmental Management Systems (EMS) conform to ISO 14001:2015.
- Our data and information management security systems meet ISO 27001:2013 standards.
- Our supply chain security management systems conform to ISO 28000:2007.
- Since 1993, Profile has been certificated to BS7499, the Code of Practice for Security Guarding Companies, through the National Security Inspectorate (NSI).
- We comply with BS 7858 for Screening & Vetting, and with BS 7984 for Key Holding & Alarm Response.

*Profile is a member of the Security Industry Authority, the organisation responsible for regulating private security contractors. Profile Security Services Limited currently holds SIA Approved Contractor Scheme (ACS) status for the provision of Door Supervision, Security Guarding, Key Holding and Public Space CCTV. Accreditation means we've been assessed for quality and best practice, and that we are committed to customer service and the compulsory licensing of our staff.*

The company currently operates in the following countries:

- England, Scotland & Wales

There are no activities that are considered to be at high risk of slavery or human trafficking. Through the supplier/procurement code of conduct the Company will ensure that all suppliers will also adhere to the Modern Slavery Act 2015.

## Relevant Policies

The company 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:

**Employee Concerns (Whistleblowing) Policy:** the company encourages all its stakeholders to report any concerns related to the direct activities or the supply chains of the company. This can include any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The company's policy is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can report any activities associated to slavery and human trafficking by contacting their immediate line manager or the Commercial Director in confidence.

**Employee Code of Conduct:** the company's code makes clear to employees the actions and behaviour expected of them when representing the company. The company 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 company 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. As part of the supply chain selection process all potential and existing suppliers are required to complete a Supplier Questionnaire to assess their suitability as a supplier. Within the Supplier Questionnaire all suppliers are required to provide evidence of their compliance towards Labour Standards and the principles of this standard as well as the Asylum & Immigration Act 2006.

This enables the procurement team to identify any potential risks to the quality of the service provision or goods being provided by the supplier and prevents any slavery or human trafficking. All suppliers are audited against the supplier code of conduct.

**Recruitment Policy:** the company only employs people on a permanent contractual basis. Prior to commencement of employment all employees are subject to right to work, residency, SIA and employment checks in accordance with the Immigration Asylum and Nationality Act 2006, Security Industry Authority and BS7858 Code of Conduct. The Recruitment Policy is compliant with all EU and UK legislation, including the minimum wage.

**Corporate Governance & Social Responsibility Policy:** this policy sets out the responsibilities of the Board of Directors and the company's commitment towards the external Environment, Health & Safety, Workplace responsibilities and assurances to the supplier chain code of conduct. The Policy is communicated to the whole workforce and forms part of the induction programme.

**Anti-Bribery/Fraud Policy:** the company's Anti-Bribery Policy aims to prevent any form of bribery being committed within the company and by any stakeholder(s) associated with its business. Profile Security Services' Board of Directors fosters a culture of integrity where bribery is unacceptable. This policy is communicated to all employees and forms part of the induction programme.

## Our supply chain

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place in our supply chains.

Profile Security Services Ltd procures products and services in order to sustainably develop its business.

The key areas of procurement are:

- I.T. hardware, software and telecommunications
- Vehicles
- Stationery
- Personal Protective Equipment and Uniforms

## Identification of potential risk of slavery and human trafficking areas in the business

Profile Security Services Ltd has identified the following business areas as the most significant potential risk:

- The provision of agency labour
- The supply chain

## The provision of agency labour

- The potential risk - Enslaved or human trafficked individuals are placed in work as agency labour with clients
- Risk control - Profile Security Services Ltd undertakes rigorous checks on each individual including: eligibility to work, references, qualifications, Proof of NI (UK), and bank details to ensure each person is acting in their own right

## The supply chain

- The potential risk - The use of suppliers that contravene the Modern Slavery Act 2015
- Risk control - All suppliers are required to complete and return a supplier appraisal questionnaire and to commit to their adherence to the Modern Slavery Act 2015

## Due Diligence

The company undertakes due diligence when considering taking on new suppliers and regularly reviews its existing suppliers. These due diligence measures and reviews include:

- Evaluating the modern slavery and human trafficking risks of each new supplier in accordance with the supply chain selection process
- Conducting supplier audits through the Profile Security Services Commercial Director, which have a greater degree of focus on slavery and human trafficking where general risks are identified
- If required, taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans where applicable. Audits carried out on Profile Security Services suppliers have confirmed that they meet the Profile Security Services supplier code of conduct and therefore no improvement plans have been invoked
- If required, invoking sanctions against suppliers that fail to improve their performance in line with an action plan or that seriously violate our supplier code of conduct, including the termination of the business relationship. Audits carried out on Profile Security Services suppliers have confirmed that they meet the Profile Security Services supplier code of conduct and therefore no sanctions including termination of contracts have been issued
- We review our supplier appraisal questionnaires as required by our Procurement Process in our Quality Management System
- Our point of contact with national or international supply chains is often with a UK company
- We expect these entities to have suitable anti-slavery and human trafficking policies and processes. It is not practical for us to have a direct relationship and influence with all levels in the supply chain

## Board Member Approval

This statement has been approved by the organisation's board of directors, who will review and update annually.



**Andrew Prendergast,**  
**Chief Executive Officer**

May 2021

## Distribution List

A copy of the Modern Slavery & Human Trafficking Policy is made available to all Profile employees and distributed, upon request, to suppliers, clients and potential clients.

## Version Control

NUMBER	COMMENTS	REVIEW DATE
v1.0	Original version (draft)	07/07/2020
v1.1	Design and layout changes	31/05/2021
v1.2	Changes to cover page	18/08/2021