

MODERN SLAVERY & ILLEGAL WORKER POLICY

Introduction

This statement is made for the financial year ending 2024 pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that Plexus Fire & Security Limited has taken and is continuing to take to ensure that modern slavery, human trafficking or illegal working is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour Plexus Fire & Security Limited has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

OUR BUSINESS

Plexus Fire & Security Limited are an installer and maintainer of Electronic systems throughout the UK.

OUR HIGH-RISK AREAS

We have identified that there are a number of European “Engineers” available within the employment market, most of whom have very limited experience of UK Systems but are available for a reduced cost. Plexus Fire & Security Limited do not see that these personnel offer either party value for money, so have introduced a policy to pay Industry Standard wages for suitably experienced engineering staff. We are also in the process of introducing a written pre-employment exam to ensure staff are considered competent prior to being offered a position within the Company.

RIGHT TO WORK

All employees in the Fire & Security Industry are employed subject to full security screening to BS7858: 2019. This includes, prior to commencement of employment, a PNC/DBS check, financial background checks, Government Watch List check and proof of Identity, residency and right to work in the UK.

All employees are employed subject to full checks that they are legally entitled to work in the UK.

It is against the law to employ a person who does not have permission to live and work in the UK. The Company could be prosecuted and fined under the Immigration and Asylum Act 1999 for employing somebody who does not have permission to work in the UK. Our organisation has documented controls to demonstrate compliance with Sections 15-25 of the Immigration, Asylum & Nationality Act 2006.

Therefore all applicants will be required to provide evidence of one original piece of documentation from the list below, along with proof of identification and permanent address, before an offer of employment is made. Documents used to verify right to work are compliant with the Home Office Guidance “Comprehensive Guidance for Employers on Preventing Illegal Working”.

- A document giving the person’s National Insurance number and name. This could be a P45, a National Insurance card or a letter from a government agency;
- A document showing that the person can stay indefinitely in the UK or that they have no restriction preventing them from taking employment. This may be an endorsement in a passport or Home Office Letter;

- A work permit or other approval to take employment from the Department for Education and Employment; careful attention should be paid to what types of work the permit allows and if there are any immigration restrictions.
- A document showing that they are a UK Citizen or have right of abode in the UK. This may be an endorsement in a passport, a birth certificate, a registration or naturalization document or a letter from the Home Office;
- A document showing that they are a national of a European Economic Area country. This may be a passport or national identity card: or
- A document confirming registration with the Worker Registration Scheme.
- In order to avoid discrimination, it is essential that the same criteria be applied to every person who is offered employment with the Company. It will be the responsibility of the recruiting manager to ensure that a relevant document has been supplied which satisfies the criteria set out above.
- If an applicant is not able to produce one of the listed documents then they will be advised to contact the Citizens Advice Bureau for further advice and their employment will be put on hold until evidence can be produced and the offer may be withdrawn.
- If we have reason to believe that a potential employee is trying to obtain work in the UK under false documentation we gather information and report this to the Home Office.
- Additional checks are carried out on any employees with a temporary right to work in the UK when their immigration permission is due to expire during the term of their employment. Further document checks will be carried out to ensure their right to work documents have been renewed before continuing with their employment.
- All verified documents are retained for at least 2 years after the employee has left employment.

OUR POLICIES

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. **Anti-slavery policy.** This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. **Recruitment policy.** We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. **Whistleblowing policy.** We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
4. **Code of business conduct.** This code explains the way we behave as an organisation and how we expect our employees and external providers to act.

OUR EXTERNAL PROVIDERS

Plexus Fire & Security Limited operates an external provider policy and maintains a preferred list for key providers. We conduct due diligence on all external providers before allowing them to become a preferred provider. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery and on-site audits which include a review of working conditions, where deemed necessary. Our anti-slavery policy forms part of our contract with all external providers and they are required to confirm that no part of their business operations contradicts this policy. In addition to the above, as part of our contract with external providers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own external providers to account over modern slavery
3. For UK based external providers; they pay their employees at least the national minimum wage/national living wage (as appropriate)
4. For international external providers; they pay their employees any prevailing minimum wage applicable within their country of operations
5. We may terminate the contract at any time should any instances of modern slavery come to our attention

TRAINING

We regularly conduct training for our procurement teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

OUR PERFORMANCE INDICATORS

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if no reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

APPROVAL FOR THIS STATEMENT

This statement was approved by the Managing Director on DATE.

Signed: Ross Adams



Managing Director
12th January 2024