



Assured Group Ltd: Anti-Slavery And Human Trafficking Statement

Introduction

This statement sets out Assured Group Ltd.'s ("Assured") actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year ending 31 December 2016, and is made pursuant to the Modern Slavery Act 2015.

As part of the automotive sector, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking. The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

The Modern Slavery Act 2015

The Modern Slavery Act gives law enforcement the tools to fight modern slavery, ensure that perpetrators receive suitably severe punishments for these appalling crimes and enhance support and protection for victims.

It also requires businesses over a certain size to disclose each year what action they have taken to ensure there is no modern slavery in their business or supply chains.

Organisational structure and supply chains

This statement covers the activities of Assured Group Ltd:

Assured Group Ltd specialises in providing Vehicle Preparation Management, associated value added services and managed labour solutions to the automotive industry across Europe. Assured provides a highly flexible workforce and long term cost effective solution to our clients across three main divisions of the automotive sector - Rentals, Garages and Fleet. Our client portfolio includes Vehicle Manufacturers, Auction Houses, Daily Rental Companies, Dealer Groups, Logistical Operations, Vehicle Dealers and Repairers.

In the UK, Assured currently employs over 500 staff, and utilises the services of over 3500 subcontractors, who are engaged to supply services at our clients' premises. Assured also operates in the Republic of Ireland and employs approximately 400 staff members, who work on our client's sites providing vehicle preparation along with delivery and collection services on behalf of their customers.

Assured uses a variety of local, national and international suppliers to source goods, services and equipment for the operation of the business, and as such it is committed to ensuring that all those in our supply chain are also working in adherence to the Modern Slavery Act 2015.

Responsibility

The Board of Directors of the Company has ultimate responsibility for the organisation's anti-slavery initiatives across the organisation.

Other Heads of Department within the organisation, such as Human Resources and Health & Safety, also have a responsibility for putting in place and reviewing policies relating to Modern Slavery, identifying and analysing risks of human rights and modern slavery and conducting investigations and due diligence in relation to suspected instances of slavery and human trafficking. Local Management at all levels are also responsible for ensuring those reporting to them understand and comply with this policy and are given regular training on it and the issue of modern slavery.

Relevant policies

The organisation 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:

Standards of Business Conduct: The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating and managing its supply chain.

The organisation has policies in place such as Whistleblowing, Corporate Social Responsibility, Recruitment and Supplier Code of Conduct, and these policies are currently being reviewed following the end of our most recent financial year.

Due diligence

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier;
- reviewing on a regular basis all aspects of the supply chain;
- conducting supplier audits or assessments through the organisation's own staff, which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers (either directly or via third party auditors) and requiring them to implement action plans;
- using ethical suppliers who in turn monitor their labour standards, comply in general, and with modern slavery and human trafficking in particular; and

- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

Performance indicators

The organisation has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, we are in the process of introducing the following:

- All Local Management who have direct reports are to be trained on the issue of Modern Slavery. All HR professionals, and any individuals who have direct contact with suppliers will also undertake training on this issue. HR will guide and train Local Management of their obligations and responsibilities regarding these issues.
- All existing supply chains will be reviewed, whereby the organisation will evaluate all existing suppliers.
- All new and potential suppliers must confirm their adherence to the Modern Slavery Act 2015. The organisation are in the process of implementing such a system to capture this information.

The above KPIs are expected to be completed within 6 months of the date of this Statement.

Training

The organisation requires local management, HR professionals and any individuals who deal directly with suppliers within the organisation to complete training on modern slavery. This training is in progress and is expected to be completed within 6 months of the date of this Statement via an online course.

The organisation's modern slavery training covers:

- our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
- what external help is available;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.
- Awareness-raising programme




As well as training staff, the organisation has raised awareness of modern slavery issues by circulating a series of emails to staff.

The emails explain to staff:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- what external help is available, for example through the Modern Slavery Helpline.

All Assured Group Ltd team members are expected to familiarise themselves with any policy to assist in identifying and preventing any acts of modern slavery or human trafficking. Any new team members are also introduced to the policy as part of their induction process with the company.

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

Signed: 

Date: 1st August 2017
Heath Evans, Managing Director