



# Modern Slavery and Human Trafficking Statement 2024



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## Introduction

I am delighted to provide you with our Modern Slavery Statement for the Financial Year 2023/24. This statement outlines the progress we have made towards eliminating the risk of modern slavery and human trafficking from our business and supply chain, and the actions we will take over the coming year.

At its core, Ground Control is a values-driven business. Acting with integrity and looking after our people are not just principles, they are ingrained in our DNA, guiding every decision and action we take. We believe in the power of human connection and the symbiotic relationship between people, places and the planet. Our purpose is to bring life and energy into our environments for the benefit of the whole community. With a vision to leave our environment in a better state than we found it, we are driven by a collective purpose to make a positive impact.

I am immensely proud of the strides our team have taken in addressing the risks our business faces in relation to modern slavery. In 2023, we made a firm commitment to becoming pioneers in this arena, setting the standard for ethical practices and collaborating with like-minded organisations to drive meaningful change. Our partnership with the anti-slavery charity Unseen UK is a testament to our dedication to propelling this journey forward. I am thrilled to be working alongside them with our shared commitment of working towards a world without slavery.

Ground Control operates with agility and a shared commitment to growth. This ethos aligns seamlessly with our values, empowering us to navigate the complexities of global and local challenges while

actively engaging with our communities. As a responsible business, we are prioritising leadership in addressing modern slavery, and welcome partnerships and feedback from organisations eager to join us in this endeavour.

Our community-focused approach extends beyond rhetoric. We are deeply engaged with local communities through our Field Teams. We actively partner with them to deliver high-value work for our clients and believe these close partnerships help us better manage and monitor the modern slavery risks in our industry. Our ongoing monitoring of our Field Teams' compliance will be supported further by the introduction of Skillko which, along with our existing systems, gives us visibility of the compliance of every operative working on behalf of Ground Control. I believe that here we are unsurpassed. We do not want to become complacent, however, and an important focus for the coming year will be setting out a longer-term strategy for modern slavery and continuing to engage our people and partners.

I'd like to finish by thanking our teams, partners and stakeholders for their support this year and extend an invitation for continued collaboration as we strive to set new standards of excellence in the fight against modern slavery.



A handwritten signature in black ink, appearing to read 'J. Knights'.

**Jason Knights,**  
Managing Director



## Legislative statement

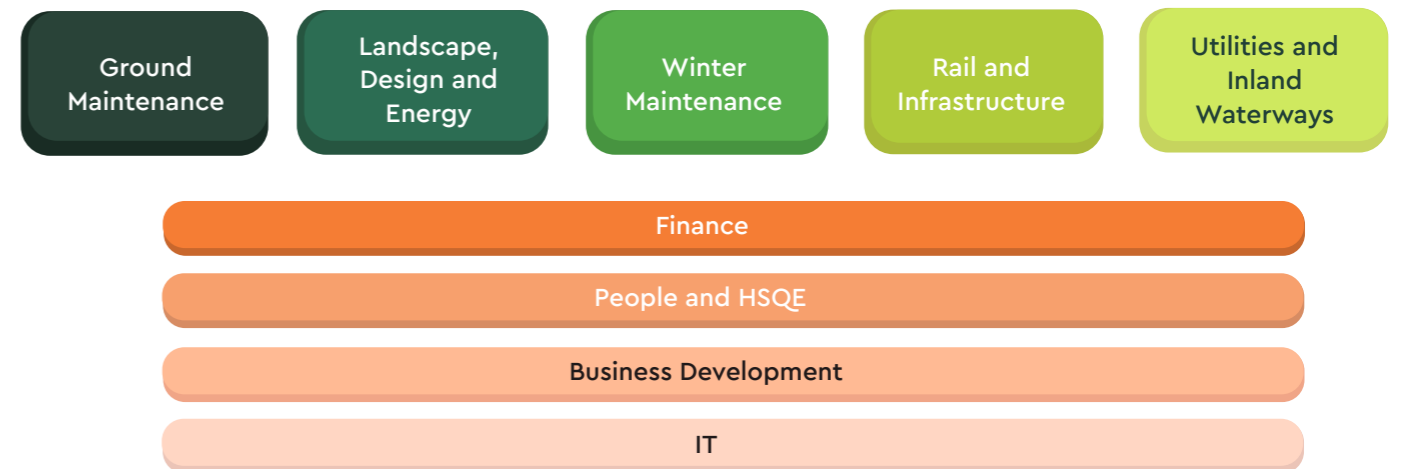
This statement sets out Ground Control's actions to understand all potential modern slavery risks related to our business, and to put in place actions to mitigate the risk of modern slavery and human trafficking within Ground Control Holdings Ltd and all of its entities, including Ground Control Ltd. This is our eighth statement under the Modern Slavery Act 2015 and constitutes our Modern Slavery Statement for the financial year ending 31st March 2024. It details the key activities we have undertaken to demonstrate our commitment to making a positive difference in reducing the modern slavery risks that could be connected to our business.

We know modern slavery and human trafficking is a growing issue in our society and we remain committed to doing all we can to eradicate it. For this reason, we will continue to review our approach and actions to ensure we are doing all we can to minimise the risk of modern slavery occurring within our business or supply chain.

Within Ground Control, we use the Ethical Trading Initiative's (ETI) Base Code as our guide for ethical employment practice. Our work towards exceeding goals in this area is intended to support our efforts in addressing any modern slavery risks within our industry. We also remain compliant with, and expect our suppliers to remain compliant with, the principles set out in the UN Global Compact Initiative, the International Labour Organisation's standards on child labour and minimum age, and the principles of the Modern Slavery Act 2015.

## Who we are

Ground Control, established in 1973, is a "can-do" entrepreneurial business founded on the core principles of quality and delivering an outstanding service. With revenues of circa £195m across the group, we provide comprehensive, multi-disciplined and integrated services to support our customers with all their external property needs across our five operational divisions.



Our supply chain is predominantly national (with a small operation in the Republic of Ireland), and our procurement activity is largely centralised, with the department sourcing materials and equipment principally related to the provision of services to our customers.

We also have a network of Field Teams who work on our behalf delivering work across the UK and the Republic of Ireland.





# Our values

Ground Control is a values-driven business. Our values are reflected in our actions, policies and processes, and we expect all our people and partners to be deeply familiar with what our values mean to us. They are the foundation upon which we approach a complex, multi-faceted issue and we do so with integrity, commitment and a genuine desire to effect positive change.

By integrating them within our business we give our people and partners guiding principles, prioritising behaviours that align with integrity, fairness and respect for human rights. They also provide a framework for us as we grow, ensuring our people have a sense of purpose as they seek to navigate changing markets and sectors.



## Our commitment on modern slavery

At Ground Control, we are steadfastly committed to leading the fight against modern slavery. With responsibility as one of our guiding principles, we pledge to set the standard for ethical practices in our industry. By 2025, we aim to be recognised as a beacon of excellence, driving transparency, accountability and innovation throughout our operations and supply chains. We will invest in robust due diligence, engage with stakeholders and champion collaboration to eradicate modern slavery.



## 2023/24 progress

2023 was a seminal year for us and we made huge progress with our work on modern slavery. Much of this work laid the groundwork for further progress. This section outlines key actions in the past year:

### Partnership with Unseen



2023 saw us enter into a long-term strategic partnership with Unseen, a UK-based anti-slavery charity. Their influence, even in a short time, has been astounding and their support will be key to our modern slavery strategy.

Whistleblowing helpline provider, and updated our modern slavery training to reference our updated processes. We also refined our risk assessment process for our employees and Field Teams by introducing a broader Labour Risk Assessment. This enables us to pinpoint areas of our workforce most at risk of modern slavery so that we can put in place mitigating actions to support these individuals. Related site audits have since been updated following feedback from Unseen.

Unseen carried out a detailed gap analysis on our modern slavery actions, policies and processes and, most critically, our auditing and risk assessments. As a result, we have been able to develop our approach and increase the confidence of our people in their ability to identify, manage and mitigate modern slavery risks to our business.

Unseen are also actively working with us on our five-year modern slavery strategy and KPIs. We are confident our partnership will allow us to become an industry leader in combatting the scourge of modern slavery. We look forward to them continuing to act as a critical friend, ensuring our practices and approach proactively address modern slavery risks to our business.

With support from Unseen we introduced an escalations and remediation process to our Modern Slavery Policy, introduced Safecall as our new

"We began working with Ground Control in 2023 and have been impressed at the significant progress they have made in tackling the risks of modern slavery within their business and their wider ambitions for the industry. We look forward to continuing our partnership with Ground Control and working together to implement tangible actions to mitigate the risks of modern slavery and set a standard for ethical leadership within their industry."



Thea Cooper, Senior Business Manager, Unseen UK



# Leadership

All our people undergo annual e-learning training on modern slavery. This year we also provided enhanced training to our leadership team and our Procurement, Supply Chain and People teams. Our focus was on ensuring our operational and support function leaders fully understood the risks modern slavery poses to our business, while empowering them to build on our current processes and actions to tackle these risks. All of our leadership, Procurement, Supply Chain and People teams have completed this enhanced training and 87% of our employees have completed their online e-learning training. It is our intention that 95% of our employees will complete their training within the next year.

In conjunction with our new Modern Slavery Working Group, we are actively engaging our leaders and giving them the skills to direct their teams in managing our people and processes on site through management training, regular toolbox talks on modern slavery and ongoing communications. We intend that this contributes to greater awareness around modern slavery within our organisation.



"Building awareness of modern slavery within our business is one of our top priorities. Our targeted training, including tailored sessions for leadership and key teams, exemplifies our commitment to equipping our workforce with the skills and knowledge to identify and tackle any modern slavery risks. With 100% participation in our tailored training, we're not just building awareness, we're fostering a proactive culture of vigilance around modern slavery within Ground Control."

**Darren Daley, Grounds Maintenance and Client Services Director**



# Governance

2023 saw the establishment of our Modern Slavery Working Group, which is chaired by our Group HR and HSQE Director, Lisa Blakey. The group was set up to facilitate our response to modern slavery and ensure we had a platform to inform and advise our Executive Committee (ExCo) and Board on modern slavery-related issues and our role in managing and mitigating risks.

The working group advises on the development, implementation, monitoring and review of our Modern Slavery Policy and associated Audits. It has already overseen a number of changes to our processes in partnership with Unseen.

The strong governance framework we have built around modern slavery means we have a high-level focus on modern slavery with Jason Knights, our Managing Director, having overall accountability. It also ensures the Board is holding our business to account in guaranteeing we demonstrate our values consistently and conduct our business in the right way.



"Our Modern Slavery Working Group ensures robust governance and high-level visibility of the measures we are taking to address modern slavery. As a group we are driving accountability from the Executive Committee to the Board, and rigorously reviewing all our processes and procedures to ensure we mitigate any modern slavery risks across Ground Control."

**Lisa Blakey,  
Group HR and HSQE Director**



# Policies and Systems

In conjunction with Unseen, in 2023 we reviewed key policies including our Human Rights Policy, Recruitment Policy, Honest and Ethical Behaviour Policy and our Supplier Code of Conduct. We are confident they address the needs of our growing business and set out clearly our expectations of our people, Field Teams, Suppliers and Partners. All of our policies now provide a greater focus on modern slavery and make clear our commitments here.

Policy	Updates
Modern Slavery and Human Trafficking Policy	Updated to reflect an enhanced escalations and remediation process. Also now includes further information on the support we offer to whistleblowers and victims.
Whistleblowing Policy	Updated to reflect our new whistleblowing helpline and process, our approach to supporting individuals who raise complaints, and our enhanced commitment to tackling modern slavery risks in our business and industry.
Human Rights Policy	Updated into our new policy template and to provide a more detailed reference to existing national and international Human Rights legislation and our commitments and actions here. Also reflects our enhanced commitment to tackling modern slavery risks in our business and industry and our new whistleblowing helpline and process.
Honest and Ethical Behaviour Policy	Updated to reflect our enhanced commitment to tackling the risks of modern slavery in our business and industry and our new whistleblowing helpline and process.
Avoidance of Bullying and Harassment Policy	Updated to reflect our enhanced commitment to tackling the risks of modern slavery in our business and industry and our new whistleblowing helpline and process.
Supplier Code of Conduct	Updated to reflect our enhanced commitment to tackling the risks of modern slavery in our business and industry and our new whistleblowing helpline and process.
Recruitment Policy	Updated to reflect our enhanced commitment to tackling the risks of modern slavery in our business and industry and information on our new digital right to work checking process.



We also changed the supplier of our whistleblowing helpline. We are now partnering with Safecall, which gives us an independent verification process for any issue raised and helps us ensure we remain fully compliant with whistleblowing and data laws. Safecall are a market leader in the whistleblowing platform space and have worked with us to build a clear communications process. Our helpline number now appears on all company ID cards and is being communicated to all employees and Field Team operatives along with the national Modern Slavery & Exploitation Helpline.

Our Modern Slavery Policy was also reviewed to include a clear escalations and remediation process should any instances of modern slavery be identified within our business or supply chain. The amendments to this policy have been included in our training and we continue to focus on communicating our expected responses and standards.

All of our policies are reviewed annually and we anticipate the need to change and update them as the landscape around modern slavery continues to develop.





# Risk Assessments

We recognised that risk assessments was an area of development for us and, while we expanded our approach in 2023, this is still an area of focus. One of our key priorities moving forward will be on expanding our approach to risk assessments and ensuring these become a cornerstone of our strategy on tackling the risks of modern slavery within our supply chain.

Ground Control have systemised our existing corporate risk register to enable a standardised approach to all organisational risk assessments. The register has a built-in modern slavery risk matrix that highlights our identified risks and ongoing actions. This matrix is then used to ensure all our ongoing modern slavery audits are assessed using a standardised approach, with outputs and actions logged and monitored.

Across Ground Control, risks are identified in a number of ways. These may be as a result of legislative reviews, procedural reviews, operational observation or as a result of site visits. Our site audit process, covered in more detail below, gives us the opportunity to engage directly with operatives and flag up any issues or concerns, which will automatically be escalated to our Group Director of HR and HSQE.

Along with our escalations and remediation process, any risks are logged against a list of immediate actions to reduce the risk. This detail is added to our risk register, where the initial risk is assessed to identify the level of control required. Current controls

already in place are then identified to provide an indication of the residual risk factor that Ground Control is currently carrying.

As part of the risk assessment process, the owner has a further opportunity to identify actions that can be taken to reduce the risk. These actions are tracked and managed through the Ground Control action management tool and, once completed, prompt a further reduction of the residual risk. **This continual improvement cycle helps to ensure our controls become more effective over time to reduce the risk as far as reasonably practicable.**

Ground Control's risk registers are reviewed annually as a minimum, or following significant material change in their content, a serious incident, or as a result of our business continuity testing programme.

The results of risk reviews are one of the primary inputs into the management review process. This is a key function that allows the business leaders to ensure our strategic direction is aligned to the management of risk and the implementation of improvement opportunities.

In 2023 we began a further review of our risk assessment process and have identified opportunities to build detailed risk assessments focused on modern slavery within Procurement and Recruitment. In September we carried out a full labour risk assessment, reviewing data for our employees and several of our larger Field Teams. While we want to focus in 2024 on our Field Team labour

risk assessment, we now have a comprehensive assessment in place for our employee population. This includes a detailed breakdown of our demographic, and geographical data to pinpoint areas of risk from a modern slavery perspective. We intend to complete this process annually, helping us ensure that we remain live to potential risk areas and can proactively respond to mitigate them.

At present our biggest risk areas for directly employed staff are our lone workers (male and female), a small number of non-British passport holders (1% of our manual employee population) and the 3.6% of our manual population who are over the age of 75. In addition to this, we have a small number of people (15%) who have joined us with additional needs. In all circumstances we ensure we have a strong management presence for each individual and will focus our efforts this year on ensuring these individuals are aware of their own risks of being exploited. All individuals have health and welfare surveillance and we remain live to the risks they may face in carrying out their roles. Our systems and processes allow us to track and monitor individuals' attendance and their performance on site, thereby alerting us to any changes. This gives us security in knowing any changes or issues will be identified early, allowing us to support.

**All of our suppliers undergo a risk assessment prior to being onboarded with us.** They are required to provide evidence of their efforts to tackle modern slavery in their own business and supply chain, and

demonstrate a clear commitment to sustainable business practices. In the last year we onboarded 385 suppliers, of which 33 were required under the Modern Slavery Act 2015 to have a modern slavery statement in place.

Our biggest supplier risk areas are in nursery, waste and planting supplies. In 2024 our intention is to introduce a more detailed risk assessment process for these areas.







## Audits

At Ground Control, we have always had an exceptionally detailed auditing approach across all divisions. All managers and leaders are required to carry out regular functional audits and to engage in audits of our teams and customer sites. This has enabled us to identify any operational issues and has been extremely helpful in helping us develop our approach to health and safety. Following feedback from Unseen, we have refined our management system audits to place an even greater focus on modern slavery.

### Site Visits

Our site visits now include more detailed questions on modern slavery and further guidance for managers carrying out audits. All divisions and operational functions of Ground Control use predefined assessment criteria, established in cooperation with Unseen, to provide a wide-reaching and individual-focused review of the employment conditions and welfare of our Field Team operatives.

During site visits our managers focus on building relationships with individual operatives and not just team leads. Our site audit training and guidance provides advice on how they can build rapport while looking to identify modern slavery risks. Our questions are designed to identify the reality of the individual's day-to-day role and employment terms and conditions, and specifically focus on how that person is engaged to work with Ground Control.

"The main purpose of our site visits is to interact with, engage with and understand each operative. Our focus is always on building a relationship of trust while using open questions to build a picture of their working conditions and experiences working with Ground Control."

**Brian Cowe, Senior Contract Manager**



### Data audits

We regularly conduct reviews of people and team data (including identifying duplicate details, right to work status and bank details) to allow us to identify any modern slavery risks. The scope of these reviews have been expanded in the last year to provide greater visibility of potential risk areas. We hope this information, combined with data from our site visits and audits, will allow these data reviews to become a vital asset in our continued modern slavery vigilance.

### ETI base code audit

Ground Control have worked with SMETA over the last year to assess and improve our alignment to the commitments of the ETI base code. These audits highlighted areas for improvement including visibility of our policies, processes and procedures, which were summarily actioned. This resulted in greater levels of confidence, awareness and demonstrable evidence of compliance being available. Ground Control will continue to work with SMETA, our supply chain and our clients in assessing our ongoing adoption of the ETI base code through annual external and internal audit.

### Modern slavery process audit

As Ground Control's integrated management system continues to evolve, we have implemented end-to-end process audits that allow our auditors to follow the lifecycle of our controls through all stages and stakeholders to provide an insight into their performance. As our modern slavery controls become more integrated into our standard ways of working, these process audits will continue to identify opportunities to improve our controls. The overall objective of these audits is to assist in ensuring our management system integrates all requirements seamlessly.

### Risk management audits (including modern slavery risk)

Risk management audits are conducted annually as a minimum, with additional audits scheduled following significant change or incidents. These audits contain all identified risk controls across our Ground Control Corporate Risk register and its linked Modern Slavery Risk Register.

Risk management audits focus on evaluating the controls that have been identified per risk and establishing their effectiveness in reducing the likelihood or severity of potential breaches.

### Findings

Any nonconformities or opportunities for improvement raised during the audits are managed through our Ground Control Auditing tool. This establishes ownership and ensures appropriate action plans are identified and tracked to rectify any issues, or otherwise take advantage of improvement opportunities.



## Our aims for 2024/25

We want to build on the strong work we did in 2023 and move towards our aim of being a leader in the modern slavery space.

We want to keep a continued focus on modern slavery and know we cannot become complacent. We have, therefore, identified a number of key focus areas which we will address over the coming year in addition to our ongoing actions.

These key focus areas are:

1. Develop an overarching strategy for modern slavery within Ground Control. This will allow us to focus on actions that prevent the risk of modern slavery while exploring further levers to address the broader risks of modern slavery in our supply chain. It will take account of the increased vulnerability to modern slavery and the UK falling behind the global legislative agenda.
2. Broaden and deepen our relationship with Unseen UK to build our understanding of modern slavery and help us to evolve our approach through our policies, processes and actions.
3. Continue to train and enhance awareness of modern slavery, particularly within our Field Teams.
4. Build our approach to risk assessments across the business, including our labour risk assessment for Field Teams and their operatives so we have a comprehensive understanding of our risk areas.
5. Implement Skillko, an overarching compliance management system for our supply chain, and continue to focus on compliance across Field Teams. This includes digitising many of our processes to reduce administration and ensure effective checks and balances are in place to minimise the risk of modern slavery.
6. Continue to take a proactive approach to supplier due diligence and significantly expand our risk assessment approach, while fully embedding our tiering approach for all teams so we can align detailed assessments appropriate to each tier.
7. Train key members of our leadership in whistleblowing and modern slavery investigations so we are prepared if any risks appear in our business.

## KPIs

We have a set of Key Performance Indicators (KPIs) which will help us monitor the effectiveness of our actions. They were developed in line with our priorities for the upcoming year, and will allow us to track our progress.

KPI	Target	Reasoning
Ground Control culture – employees feel Ground Control is driven by outcomes and values as well as profit.	0.83	Question in the Ground Control Engagement Survey: "Ground Control is driven by outcomes and values as well as profit." 2023 score was 0.83 and we want to maintain this.
Ground Control culture – Field Teams feel Ground Control leaders are honest and trustworthy, and act with integrity.	0.83	Question in the Ground Control Field Team engagement survey: "I believe the leaders of Ground Control are honest and trustworthy, and act with integrity." 2023 score was 0.81 and we want to maintain this.
Training – employees and Field Teams are aware of the risks of modern slavery.	95% of all employees completed training in modern slavery and human trafficking.  80% of Field Team operatives completed training in modern slavery and human trafficking.  100% of leadership team have been through enhanced modern slavery and human trafficking training.	Demonstrates awareness of the causes, risks and issues related to modern slavery and human trafficking.
Modern slavery risks are proactively assessed via our supplier onboarding channels	100% of new suppliers to sign up to commitment to tackle modern slavery in their business and supply chain.  90% of Tier 1 supplier categories to be audited.  Modern slavery to be a set agenda item for all Tier 1 supply partners in joint supply planning reviews.  75% of suppliers to acknowledge receipt and review of our code of conduct annually.	Demonstrates awareness of the causes, risks and issues related to modern slavery and human trafficking.
Field Teams are actively engaged with combatting modern slavery.	50% of Field Teams who implement their own modern slavery, whistleblowing and equality policies.	Demonstrates awareness and commitment from our Field Teams.
Adherence to modern slavery best practice provisions across the Ground Control group.	At least 12 audits to be completed annually if a member of an operational leadership team.  At least four audits to be completed annually if a member of a non-operational leadership team.	Enables organisation to identify risks and look to address concerns raised while demonstrating leadership commitment to eradicating modern slavery.



# Working at Ground Control

## Our people

At Ground Control, we are deeply committed to supporting our people and minimising the risks of modern slavery within our operations. We are proud to be an accredited BCorp employer, and have Investors in People and Best Companies status, all of which recognise our investment in our people and our commitment to creating an inclusive, sustainable and ethical employment environment.

As a Real Living Wage accredited employer, we ensure all of our employees receive fair and equitable compensation for their valuable contributions.

We prioritise the financial stability and wellbeing of our employees, and work hard to ensure fair and equitable reward policies for all of our employees. We have a hardship fund which all employees can access to provide grants and we are proud to have supported a number of employees to get out of debt and pay unexpected bills.

Our annual engagement survey provides us with valuable insights into the experiences and concerns of our workforce, allowing us to identify areas for improvement and tailor our strategies accordingly. This year our employees indicated they felt Ground Control to be a supportive and ethical company where they enjoyed working for their managers and colleagues.

The team have asked us to focus on our communications strategy and we have appointed an individual to lead such a strategy for 2024.

We have strong policies designed with a clear focus on supporting our people and upholding their rights. We maintain clear Human Rights, Grievance Whistleblowing and Modern Slavery policies, providing transparent guidelines for addressing any concerns or issues that arise. Our robust recruitment

process ensures that we hire ethically and responsibly, with rigorous right-to-work checks, ongoing data audits, and personalised meetings for every candidate with our talent team members who are trained in identifying signs of modern slavery at interview stage.

All our processes are mapped and reviewed annually, with monthly audits to ensure we adhere to them and to identify areas of risks. Our audits are detailed and we aim to ensure we identify and mitigate any factors that may lead to modern slavery risks.

## Examples of monthly audits

Our people data is audited monthly. We review for duplicate employee data points such as bank, next of kin and address details. Where duplicates are identified, we look to understand the reasons. As a small business we have a number of family members working for us, so it is not unusual to have the same details for a number of people. However, this is always something we look to validate.

Our payroll data is audited monthly to ensure all employees are paid at real living wage levels and that overtime payments are in line with reasonable working hours. Where employees are identified as continuously working extended hours or overtime, we look to engage with them to understand the reasoning and provide appropriate support.

At Ground Control, we firmly believe in treating our people with dignity, respect and fairness. While we do not claim that the risk of modern slavery within our organisation is non-existent, we are actively aware of potential risk areas through our Labour Risk Assessment and Welfare audits, and take proactive measures to address them. Many of our employees work alone, so we have implemented robust processes and systems to support them and identify any risks they may face. Additionally, in recognising the vulnerability of certain demographic groups, such as the elderly, we engage in active health surveillance.

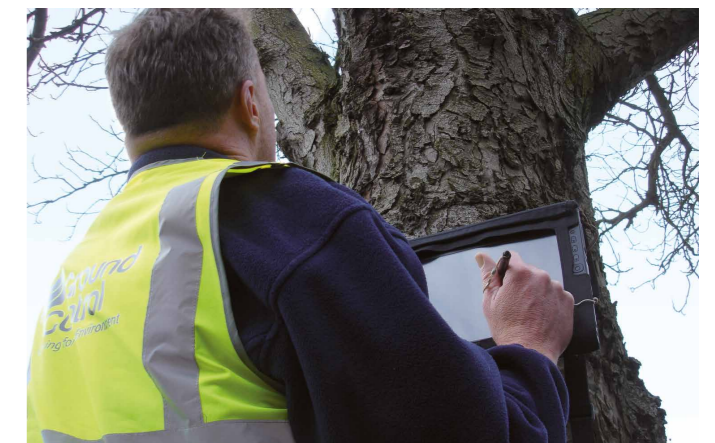
## Safecall

2023 saw the implementation of Safecall as our new whistleblowing helpline. As a business, we encourage all colleagues to raise any issues and we take any reports of inappropriate conduct or practice extremely seriously. We encourage all employees and partners to engage with our helpline if they are worried about wrongdoing. Launching a new independent, confidential helpline is another part of our armoury to ensure we do not miss anything.

The helpline also ensures we are monitoring, analysing and evaluating to help determine whether our intended results are being achieved.

To date, we have received two whistleblowing claims, both unconnected to modern slavery. Both were dealt with via our grievance process.

It is important to note that our whistleblowing helpline is made available to all Field Teams, with the number being included on their ID cards and in ongoing communications. In 2024 we plan to step up our communications with further briefings being provided to operatives, and we intend to share the details of the helpline and policy with our suppliers. We believe this transparent approach will help us in identifying any potential risks in our operative population and supply chain.

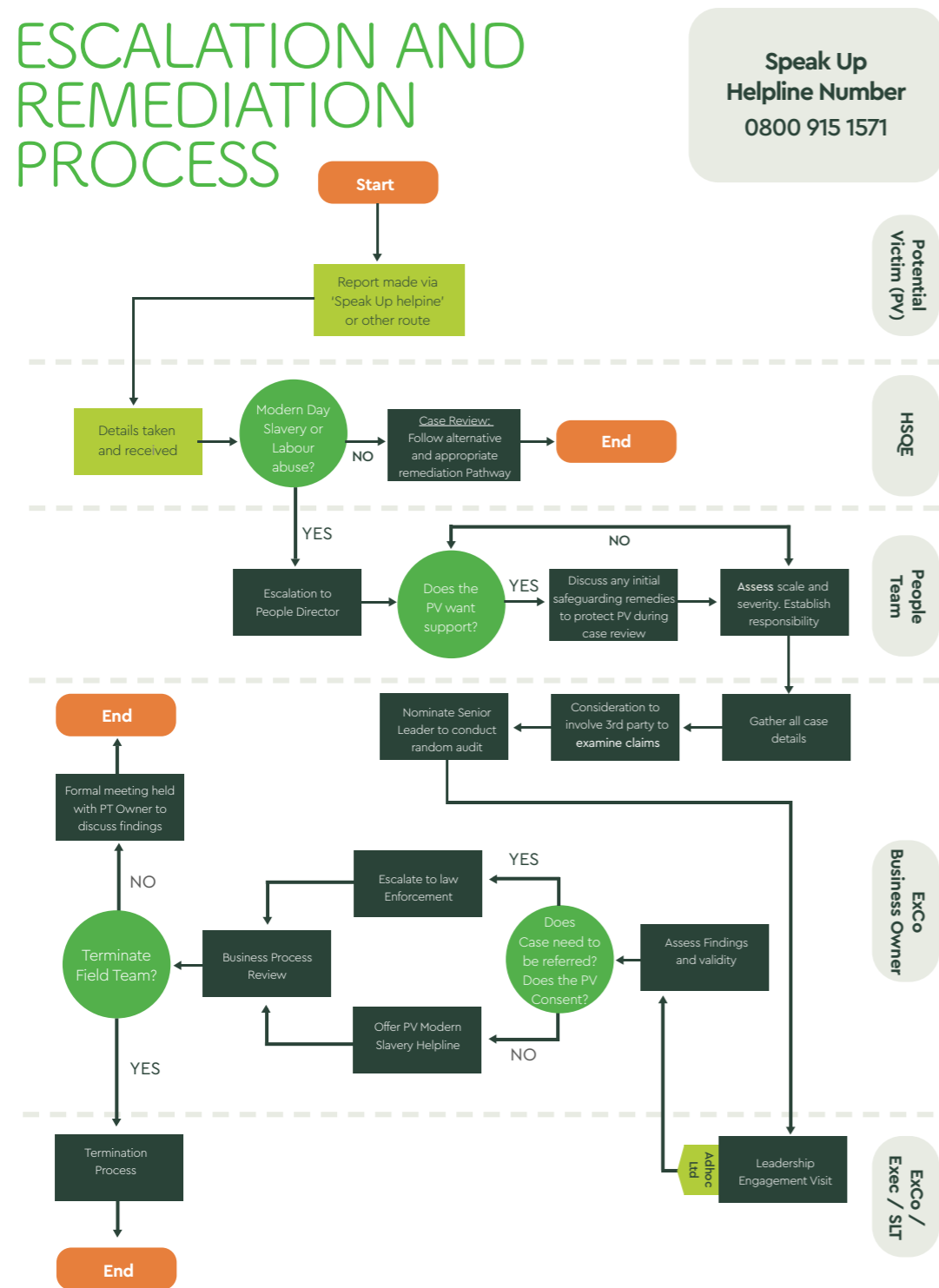




# Escalations and remediation process

2023 saw the launch of our escalations and remediation process, which sets out a transparent pathway for managing and addressing any modern slavery risks that are identified. The process is designed to ensure any of those at risk can voice concerns and seek an effective remedy. We aim to put victim support at the centre of any action we take, and to effectively respond to any modern slavery risks and ensure further risks are prevented.

## ESCALATION AND REMEDIATION PROCESS



# Our Field Teams

Ground Control operates through a network of 1,300 Field Teams across the UK and Ireland. Our Field Teams are individual sole traders, partnerships or limited companies and are specialists in delivering the required services to our portfolio of clients.

We fundamentally believe the Field Team model reduces the risk of modern slavery practices in our labour supply chain. Unlike our competitors, we do not operate with transient agency staff.

Our Field Team turnover is low, at **6.9%**; many of our Field Teams have worked with us for more than 10 years, with the average tenure being six years.

Like our employees, our Field Team operatives are well known to us and we carry out similar checks and audits as with employees. This begins at the point of engagement. Our dedicated Supply Chain personnel evaluate all potential new teams through a rigorous onboarding process using our Skillko platform, carefully examining all operatives' Right to Work in accordance with Section 8 of the Asylum and Immigration Act 1996. All operatives are assessed individually and we collect demographic and next-of-kin details for all. As individuals are assigned their own profile (identified through a unique email address and activation process) we enable them to upload their skills, accreditations and certifications, which are then

cross-referenced against a comprehensive assessment matrix to ensure all Field Team operatives are put to work safely. All individuals are then given access to our interactive e-learning suite designed to provide team owners and operatives with training and guides to assist in the delivery of their work. Annual modern slavery training is a mandatory assessment for all operatives. The module is designed to help a person identify modern slavery and provide them with routes for support and remediation if they feel they or anyone else is at risk.

Field Team owners are required to agree to Ground Control's Framework Agreement. This is a pre-condition of engagement, and non-agreement precludes the team from being onboarded. The Framework Agreement mandates full compliance with both the Modern Slavery Act 2015 and the Gangmasters Licensing Act 2004. Ongoing Field Team audits are carried out to assess compliance with these requirements and include review of payroll, contracts and employment data for every operative.

Operative, task and timing data is captured on mobile apps at the various stages of each site visit. This data tells us when a team arrives on site and when the visit has been completed. This data is surfaced in the web-based portal TotalView that can provide notifications of Field Teams being on site. This helps us to find teams and conduct unannounced audits for modern slavery detection and awareness.





# Our Suppliers

As a business, we look to ensure we engage with suppliers who align with and support our values. We are committed to encouraging and supporting our suppliers to take the same robust approach to tackling modern slavery as us. We actively engage at all stages of onboarding and supplier management with our suppliers on modern slavery and human rights topics. This includes our commitment to the real living wage. We strongly encourage our suppliers to do the same within their own supply chain, and look to lead by example in all areas.

When onboarding suppliers, we are clear in our expectations that they meet minimum legislative requirements – but **we prioritise working with suppliers who can show they go above and beyond.**

All suppliers complete an onboarding assessment and we review their existing policies, processes and procedures relating to modern slavery and sustainable and ethical practices. We look to measure their level of robustness and ensure their stated actions align with our values and the requirements outlined in our Sustainable and Ethical Procurement Policy. **We are unable to progress with any companies who do not meet our requirements** here. We are however, working to ensure that in our commitment to tackling modern slavery we provide feedback to suppliers and an action plan to help them develop their approach. We believe this will better support stamping out modern slavery across society as a whole and not just our business.

At the start of 2024 our entire Procurement team went through enhanced training on modern slavery. This was extremely useful for our Supplier Onboarding team in assisting them to better identify modern slavery risks and concerns.

All of our suppliers are risk assessed based on their submissions and the products or services supplied. Those deemed to be high risk will be reviewed in greater detail and potentially not progressed with. We recognise this is an area we could do more work in, and it will be a focus for us in 2024.

Our suppliers are also managed in accordance with our Supplier and Field Team Code of Conduct. This makes clear our commitment on modern slavery and sets out our expectations of suppliers.

**Any supplier found to be in breach of any aspect of this code may be terminated by us following investigatory actions.**

We believe building relationships and trust with suppliers is critical when it comes to preventing and identifying incidences of modern slavery. All of our suppliers are tiered by spend and we aim to push 80% of our spend via our Tier 1 suppliers. We manage our Tier 1 suppliers using performance reviews, feedback questionnaires, Supplier Relationship Management (SRM) reviews and a comparative performance scorecard every six months. This process includes a more in-depth review of the supplier's commitment on modern slavery and details of their own supply chain audits. This feeds into a Joint Supplier Plan which

enables us to track KPIs which can be discussed and refined at the SRM meeting to ensure they are actively managing and mitigating risks.

If, during our regular SRM meetings, any modern slavery risks are identified we work on a Joint Supplier Action Plan to remedy these. We have yet to experience any instances where modern slavery has been identified within our supply chain or with one of our suppliers. If we did, our intention would be to fully offer to engage with the supplier to support them in managing the issue. We believe arbitrarily exiting a supplier would lead to us failing in our commitment to tackle modern slavery and potentially create further risk for victims. We will, therefore, offer to work

in tandem with any supplier and involve specialist parties and law enforcement where necessary.

All of our suppliers are given access to our Modern Slavery and Whistleblowing Policies and our intention is to communicate more on our processes in 2024.

Within Procurement, we recognise we have work to do on fully documenting our risk assessment and auditing processes and this will be a key focus area for us over the next year. **Working in partnership with Unseen, we have been significantly expanding our supplier auditing processes to ensure we capture and mitigate any modern slavery risks with our suppliers.**





## Training and awareness

One of our focuses for 2024 is to continue the drive to raise awareness among our teams of the risks of modern slavery within our business and how we can work together to address it. Our modern slavery training is mandatory for all employees and team members are trained to identify modern slavery and the process they should follow if they identify any instances. We have yet to have any issues raised relating to modern slavery but are confident that our people know when and how to highlight issues.

All new starters go through an e-learning module on modern slavery and we repeat this annually for all employees. Our current completion rate for this is 87% and we want to ensure we increase this to 95% in 2024/25.

This training is also mandatory for Field Team operatives and we are confident that the training, which was audited by Unseen, plays an important role in raising awareness and giving people the tools and knowledge to address modern slavery concerns. We have also put our leadership team through enhanced training, and ran specific training for teams at the forefront of implementing processes to tackle modern slavery. All our leadership team went through enhanced training and 100% of employees in the Procurement, Supply Chain and People Team went through further enhanced training.

Our training is reviewed annually and will be audited on an ongoing basis as part of our relationship with Unseen. Awareness is also raised through ongoing communications to all employees and Field Teams and through the efforts of our Modern Slavery Working Group.



## Recruitment

We have always invested a great deal of time and effort in our recruitment processes. We believe strongly that hiring the right people will directly contribute to the growth and success of our business. All roles, regardless of level of seniority, go via the same recruitment process. Our process includes a mandatory "values" interview with a member of our talent team. The aim of this interview is to ensure we hire people who fit our values, and that we identify any additional needs or risks – including modern slavery. Our Talent team have been through enhanced modern slavery training and are well versed in the signs to look out for. One outcome of our enhanced training in 2023 was a review of our hiring manager training as we continue to work to raise awareness among our population of modern slavery risks.

All employees joining Ground Control onboard via a digital process within our Applicant Tracking System (ATS), Team Tailor and our People System, Bob. Through this process we review and audit all candidate details and employment history. Our data is audited to identify modern slavery risks by the recruiter and at the end of 2023 we automated our right-to-work checking process using Zinc. This

provides a greater level of robustness and ensures we minimise the risk of engaging someone who does not have the appropriate documentation to work in the UK. Because Zinc can check only UK and Irish passports, all visas are checked by the Talent team and managers.

In 2023 we onboarded more than 300 employees through Team Tailor and by April 2024 had 282 right-to-works checked via Zinc.

In 2024 our intention is to expand our suite of policies in recruitment and our risk assessment processes on our recruitment providers. We recognise our greatest modern slavery risks exist within our manual employee populations, so we will review our existing risk assessments to ensure we are fully supporting individuals who join us with additional needs and support requirements and the individuals we bring in for our apprenticeship programmes.

We also want to build a greater focus on upskilling our managers. In 2024 we want all our hiring managers to go through our hiring manager training, providing us with another opportunity to upskill our people in spotting and managing modern slavery risks.



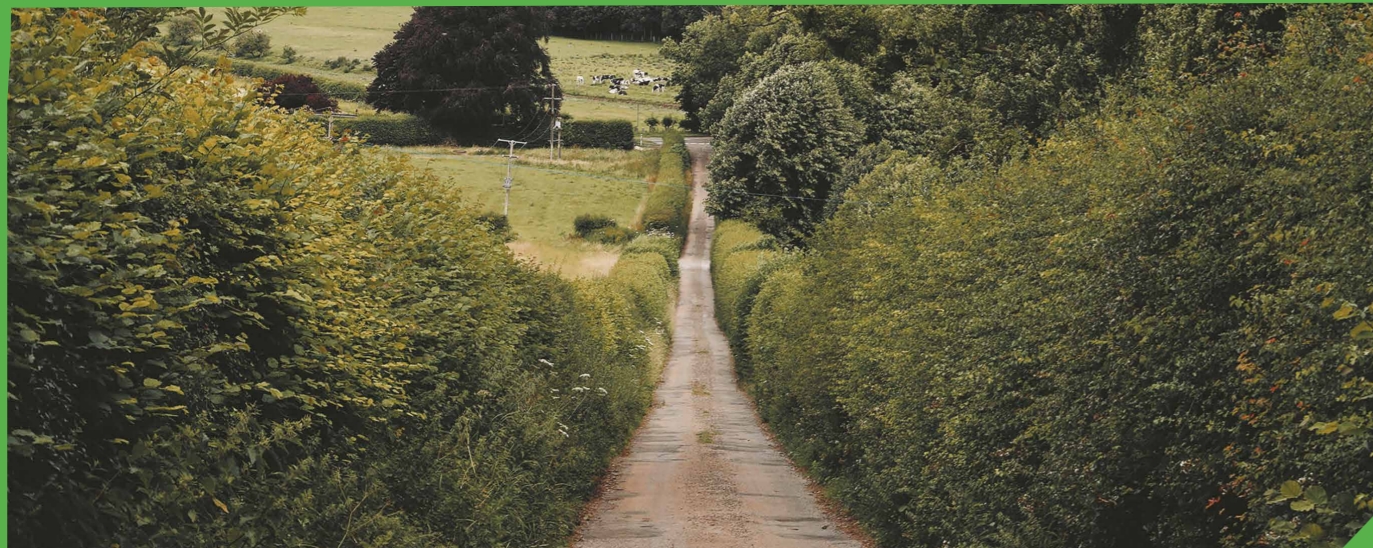


## Labour Risk Assessment

We recognise that as an industry we have a lack of diversity in many of our manual roles and are making a significant effort in the recruitment space to tackle this. Each year we carry out a labour risk assessment so we can identify areas of risk across our business and put in place actions to mitigate them.

Our ethnic and gender diversity is an area we wish to significantly focus on. We consider our manual employees to be at a higher risk of slavery and exploitation than our professional staff and, therefore, this is where we focus our attentions. Among our manual employee population we have a small number of female employees (2.7%), all of whom work in teams, and a small number of non-UK nationals (1%). We are aware of the risks in these areas and carry out audits and due diligence checks to ensure all individuals are protected from the risks of slavery and exploitation.

While many of our roles are low skilled, we make a significant investment in all our people. In 2023/24, 95% underwent some form of training. Some 3.6% of our employees are above the age of 75, so we have invested in our health surveillance activities to ensure we are regularly checking in on the health and welfare of our older workers. We also have a number of lone workers, all of whom use our Stay Safe app to monitor their whereabouts and activities and all of whom have regular meetings and audits with operational managers.



## Conclusion

We will continue to remain vigilant in monitoring and tracking modern slavery risks in our business. We commit to working closely with Unseen UK and our employees, Field Teams and partners to address all known and emerging risks in our business and supply chain. We recognise that the world is changing and new risks are identified every day. We have a zero-tolerance approach to modern slavery and will continue to underline this with robust policies and practices which will be overseen and analysed by Unseen UK. We will address any remediations immediately and the work will support our other ongoing commitments as a responsible employer.







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