



# Modern Slavery Policy Statement

This statement covers 1 April 2019 to 31 March 2020 and has been approved by the board of WGC Limited.

WGC Limited has been operating as a provider of housekeeping and cleaning services to the hospitality Industry throughout the UK for over 40 years. WGC Limited have over 5000 staff members that work in various client properties throughout the United Kingdom. WGC Limited is committed to preventing acts of modern slavery and human trafficking from occurring within the business and have very limited procurement activity and no onward supply chain to rely upon.

We have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our operation. We have taken concrete steps to tackle modern slavery, as outlined in our statement. This statement sets out the actions that we have taken to understand all potential modern slavery risks related to our business, and to implement steps to prevent modern slavery and human trafficking.

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## WGC Structure

WGC Limited operates across a full range of hospitality sectors including housekeeping services within the hotel sector, education, window cleaning and specialist cleaning. In order to perform its customer contracts, WGC Limited provides labour to its clients and ensures that it takes steps to ensure that all clients and members agree to comply with its policies, which aim to eliminate modern slavery and human trafficking from the business.

WGC Limited's client locations are broad within the United Kingdom in Scotland, Wales, and England. WGC Limited works with large corporate clients and smaller businesses who all work to eliminate the prospect of modern slavery and human trafficking. Each location within the business is managed by experienced managers who promote each of our policies and report to their Operation Directors and the CEO of WGC Limited.

We have a very small amount of procurement, limited to chemicals, equipment and sundries all sourced from reputable companies within the UK. As WGC Limited is committed to protecting the environment, we predominantly source our chemicals which are environmentally friendly.

## Our Clients

WGC Limited establish a relationship of trust and integrity with all our clients, which is built upon mutually beneficial factors. We base our client selection on due diligence of the client's reputation, and their respect for the law, compliance with health, safety and environmental standards, and references. We also encourage our clients to audit us on a regular basis on all aspects of our business process including our modern slavery procedures.

We are full members of the Ethical Trade Initiative and had to undergo a robust process to obtain this status. This was endorsed by the Trade Union that we have close links to. WGC Limited have not been made aware of any allegations of human trafficking/slavery activities against any of our clients, but if we were, then we would act immediately against the client and report it to the authorities. WGC Limited is continually enhancing its policies and procedures to ensure that it only works with clients who operate to the ethical standards that WGC Limited expects.

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## Employee Training and Whistleblowing

WGC Limited recognise the importance of engaging with our teams on vitally important matters including our policies that relate to modern slavery and human trafficking. Our Intranet – Central, offers a communications platform allowing for increased awareness, identification and reporting of any potential breaches of our policies. We have also introduced an “e-learning” course which provides training to our employees on a wide variety of subjects including modern slavery. Each employee is updated on any changes to these policies throughout the year and this is also reviewed annually. WGC Limited’s senior national management team meet quarterly to receive training and updates on all aspect of modern slavery and human trafficking. DBS check are completed where appropriate and necessary. Rigorous Right to work checks are completed for all new employees and on a monthly basis. Training is given to all managers involved in the right to work process.

WGC Limited have a dedicated HR helpline available to all of its employees throughout the business which, has a less than 12 hours response period. The HR helpline is a fully confidential communication tool and protects the identity of employees for all acts of whistleblowing.

## Risk Assessments

In the past year WGC have/been/ensure:

- Audited by major clients.
- Have reported on our Ethical Trade Initiatives
- Identified potentially vulnerable groups.
- Met with team members and conduct internal audits on each location 4 weekly.
- Only pay employees direct into their personal bank account
- Provide each employee with an employment contract that contains a reasonable notice period for terminating their employment.
- We do not require employees to surrender their passports or work permits as a condition of employment. WGC have not been made aware of any allegations of human trafficking/slavery activities within the business.

## Policies

- Modern Slavery Policy
- Disciplinary, Grievance and Appeal Policy which ensures fair and transparent procedures are followed at all times

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## Awareness

WGC Limited have produced posters across every location relating to modern slavery and human trafficking which have been translated into different languages. Important subjects and notices are advertised on our Intranet Central page and WGC Hub which all employees have full access to at any time.

As a member of the Ethical Trade Initiative, WGC Limited have further produced Ethical Trade posters explaining the Base Code in every location throughout the business.

Our aim is to have no incidents of modern slavery concerns reported by a client, identified by any team member, or raised by members of the public.



**Ethical  
Trading  
Initiative**  
Member

A handwritten signature in white ink, appearing to read 'Martin Birch', with a long horizontal stroke extending to the right.

**Martin Birch**  
CEO – WGC Limited  
1 Aug 2020