



Sphere  
Solutions

The Construction Recruitment Experts



# Modern Slavery Statement

Updated 4th June 2024

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# Modern Slavery Statement

Sphere Solutions Ltd is committed to ensuring that slavery and human trafficking is not taking place in our supply chains or in any part of our business. This statement is only in relation to Sphere Solutions Ltd and its business, including any temporary workers currently registered for work.

As per Section 54, Part 6 of the Modern Slavery Act 2015 (the Act), this statement lays out the measures that Sphere Solutions Ltd has taken to ensure that slavery and human trafficking is not taking place within our direct or temporary workforce. This statement is in respect of Sphere Solutions Ltd's financial year ended 31st March 2024 and was approved by the Directors of Sphere Solutions Ltd on 4th June 2024.

## Overview

Commercial businesses supplying goods or services, with a turnover of over £36 million, are required to prepare and publish a Modern Slavery Statement on an annual basis, in accordance with the Act. This statement should lay out all steps the business has taken to ensure there are no instances of slavery or human trafficking within its operation, workforce, or supply chain. The statement must set out the steps an organization has taken during its financial year to achieve this.

## Explanation of Modern Slavery

Modern slavery is a criminal practice where people are forced to work illegally against their will, often being taken from their homes, families and loved ones to live and work in unfamiliar places for little to no financial gain. It is a crime that is committed internationally and is becoming more prevalent. Anti-Slavery International estimates that 49.6 million people globally live in modern slavery, with a quarter of these being children. It is an issue that affects people of all ages, genders and ethnicities, and can be found operating across many sectors including the construction industry.

## Our Organizational Structure and Supply Chain

Sphere Solutions Ltd is employee-owned business incorporated in England and Wales. It is a recruitment agency and recruitment business that provides recruitment services to the construction industry for both permanent and temporary roles. It is not part of a group of companies other than two non-trading holding companies, Sphere Projects Ltd & Sphere Solutions EOT Trustee Ltd.

Our internal workforce consists of Recruitment Consultants, Finance professionals (payroll, credit control) and other support staff. Our offices are based in the UK, and we do not operate internationally.

We hold a database of construction candidates who have chosen to register for work with us, with no contractual requirement to accept any assignment or role offered to them. They also have the right to request removal of their details from our database at any time.

Our primary supply chain is a small number of payroll umbrella companies who pay a proportion of our temporary workforce on a weekly basis.



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# Our Policies Relevant to Modern Day Slavery and Human Trafficking

Sphere Solutions Ltd is committed to upholding anti-modern slavery and human trafficking laws in the UK. If a violation or breach of these laws are identified, we will endeavour to assist the relevant authorities as much as possible.

We have 5 company values that underpin our culture and ethos at Sphere Solutions – Integrity, Unity, Expert, Competitive and Dedicated. These set the expectation for how we behave and interact with each other, our candidates, our clients and our suppliers.

We are committed to treating everyone on an equal and fair basis and conduct our business in a manner that is open, transparent, and trustworthy. All our policies and procedures, including those relating to the Modern Slavery Act, are designed to reflect this approach.

Our specific actions to address modern slavery risk include:

- A 'Modern slavery policy' outlining the key issues, our obligations and our reporting process
- Providing a Stronger Together leaflet to all temporary workers, for each assignment, about how to spot MDS and how to report it
- Complaints and Whistleblowing policies for internal staff, our clients and our candidates
- Robust recruitment and compliance processes that comply with relevant laws, including the Immigration, Asylum and Nationality Act 2006 and the Conduct Regulations 2003
- Specific data and document checks of workers to be watchful for signs a person may be a victim of modern slavery
- Close vetting of our payroll supply chain, including appraising their own anti-slavery and human tracking policies and procedures
- Proactively working on Social Value initiatives and projects with clients and relevant partners, particularly those pertaining to the wellbeing and fair treatment of people working in construction

## Recording the Effectiveness of our Processes and Procedures

We keep records of all checks made on workers, including copies of their documents. Any complaints are logged and handled by our Senior Management Team, with outcomes and resolutions recorded. To date, we have not identified any instances or individuals we believe to be victims of Modern Slavery.



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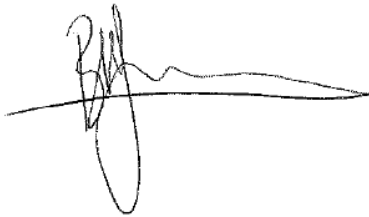
# Training on Modern Slavery and Human Trafficking

Sphere Solutions Ltd provides yearly training to our internal staff on the risks of Modern Slavery within construction, our Modern Slavery policy, and key signs a person may be a victim. We may also on occasion send representatives from Sphere Solutions Ltd to external training and education workshops on this subject.

If you would like to find out more about the above, please email [enquiries@spheresolutions.co.uk](mailto:enquiries@spheresolutions.co.uk).

Sphere Solutions Ltd takes responsibility for this Statement, its contents, associated policies and procedures, and its objectives, and will review and update it in accordance with The Act.

On behalf of Sphere Solutions Limited:



**Bryn Jones - Finance Director**

**Sphere Solutions Ltd**

4th June 2024



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