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Modern Slavery and Human Trafficking Policy

1. Policy Statement

Brass Age Ltd is committed to driving out acts of modern slavery and human trafficking within its business and from within its supply chains, including sub-contractors and partners.

The Company acknowledges its responsibility under the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods and services. These suppliers form part of the supply chain of Brass Age Ltd.

The Company will not knowingly support or deal with any business involved in slavery or human trafficking.

2. Due Diligence and Supply Chain Controls

As part of the Company's due diligence processes relating to slavery and human trafficking, supplier approval processes incorporate a review of the controls undertaken by suppliers. Imported goods sourced from outside the UK and EU are recognised as potentially higher risk, and the level of management control required for these sources will be continually monitored.

3. Roles and Responsibilities

The Company Directors and senior management take responsibility for implementing this policy and its objectives. Adequate resources, including training and investment, will be provided to ensure that slavery and human trafficking does not take place within the organisation or its supply chains.

This policy is accessible to all employees electronically and may be obtained from the HR department upon request. This policy will be reviewed annually and published accordingly.

4. Integrated Management System

This policy supports and aligns with the Company's Integrated Management System, compliant with the requirements of ISO 9001:2015, ISO 14001:2015 and OHSAS 18001:2007. Formal procedures are in place, including disciplinary procedures where breaches occur. Additional procedures ensure this policy is communicated across all levels of the organisation and reviewed regularly for continued suitability and relevance.

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5.0 Right to Work Checks (Prevention of Illegal Working)

5.1 Purpose

Brass Age Ltd is committed to preventing illegal working and reducing the risk of labour exploitation. In support of this Modern Slavery and Human Trafficking Policy, the Company will carry out Right to Work (RTW) checks on all prospective employees to ensure they are legally permitted to work in the United Kingdom.

5.2 Legal Framework

Right to Work checks will be completed in accordance with:

- The Immigration, Asylum and Nationality Act 2006 (sections 15–25)
- Current Home Office guidance on Right to Work checks
- The UK Government Right to Work checklist and Employer's Guide

5.3 Scope

This section applies to all prospective employees, including permanent, temporary, fixed-term, part-time and apprentice roles. No individual will be permitted to commence employment until a satisfactory Right to Work check has been completed.

5.4 Procedure for Right to Work Checks

Brass Age Ltd will carry out Right to Work checks using one of the Home Office approved methods, as appropriate to the individual's immigration status.

a) Manual Document Checks

Where permitted, original documents will be obtained and checked prior to employment commencing. The responsible manager or HR representative will:

- Obtain original documents from the Home Office acceptable document lists (List A or List B)
- Check that documents are genuine, valid, unaltered and belong to the individual presenting them
- Confirm photographs, dates of birth and names are consistent, and that any work restrictions are understood
- Check expiry dates and, where applicable, diarise follow-up checks

Clear copies of all documents will be made and retained.

b) Online Right to Work Checks

Where an individual holds digital immigration status, an online Right to Work check will be completed using the Home Office online service. The Company will:

- Obtain the individual's share code and required personal details
- Complete the check using the official Home Office service
- Confirm the individual's right to work and any conditions attached
- Retain a copy or screenshot of the online check result

c) Identity Document Validation Technology (IDVT)

Where permitted by Home Office guidance, Brass Age Ltd may use a certified Identity Service Provider (IDSP) to complete digital Right to Work checks for British and Irish passport holders. Evidence provided by the IDSP will be retained.

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5.5 Responsibilities

- Senior Management are responsible for ensuring this procedure is implemented and that adequate resources and training are provided.
- HR and Hiring Managers are responsible for carrying out Right to Work checks before employment begins, retaining evidence, and completing follow-up checks where required.

5.6 Record Keeping and Retention

To evidence compliance and establish a statutory excuse, Brass Age Ltd will:

- Retain clear copies of all Right to Work documentation checked (manual, online or IDVT)
- Record the date the check was completed and the name of the person who carried it out
- Store records securely with restricted access, in line with data protection requirements

Retention commitment: Right to Work documentation will be retained for the duration of employment and for a minimum of **two years after the employee leaves the organisation**, after which it will be securely destroyed.

5.7 Non-Compliance

Any individual who cannot demonstrate a valid Right to Work will not be permitted to commence or continue employment. Any concerns relating to false documentation, coercion, or potential exploitation will be escalated to senior management and addressed in line with this policy and the Company's disciplinary procedures.

Signed on behalf of Brass Age Ltd:

Signature: - 

Date: - 13/01/2026

Position: - Managing Director

Review: - 12/01/2027

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