



Modern Slavery Policy Statement

Version 7 – 01.07.2024



MODERN SLAVERY POLICY STATEMENT 2024

INTRODUCTION TO MODERN SLAVERY

Modern slavery can take many forms, including the trafficking of people, forced labour, servitude, and slavery. Any consent victims have given to their treatment will be irrelevant where they have been coerced, deceived, or provided with payment or benefit to achieve that consent.

This statement is made as part of The Company's commitment to eliminating the exploitation of people under the Modern Slavery Act 2015. It summarises how The Company operates, the policies and processes in place to minimise the possibility of any problems, any risks we have identified, how we monitor them, and how we train our staff.



50 million people worldwide are in modern slavery



28 million are in forced labour



Estimated over 130,000 victims in the UK are in modern slavery, according to UK Government



Almost 70% of those in slavery are women and girls according to slavery experts

OUR BUSINESS

The Company was founded in 1998; once an independent staffing provider in North Wales, we're now one of the largest industrial recruiters in the UK, operating from more than 50 hubs across England and Wales. Via high street branches, specialist divisions, and onsite managed service operations, our teams support with entry-level and semi-skilled placements on temporary, contract and permanent basis. With a turnover of £180 million in 2022, we currently payroll up to 10,000 temporary workers each week and cover more than 2.5 million shifts per year.

Following 20 years of independent status, The Company group became a part of the Open Up Group Inc in late 2017. Open Up Group is a global human resource and staffing provider with revenues exceeding £900 million. Their continued investment allows us to enhance the systems, processes, and products offered to our clients to ensure we continue to grow as a market leading recruitment partner.

The sectors believed to be most affected by slavery and human trafficking are construction, agriculture, textile, security, and food processing and packaging, constituting much of The Company's core business. As a leading recruiter in the UK operating within these key sectors, The Company realise that we are in at the front line of the recruitment process and our position is key to raising awareness of modern slavery and tackling the problem of hidden labour exploitation. The Company are committed to developing and adopting a proactive approach to tackling hidden labour exploitation. Our clients range from market-leading multinationals through to SMEs and start-ups. All our clients, work seekers, and temporary workers, are known to, and identified by our staff during the client on boarding and candidate registration process as applicable.

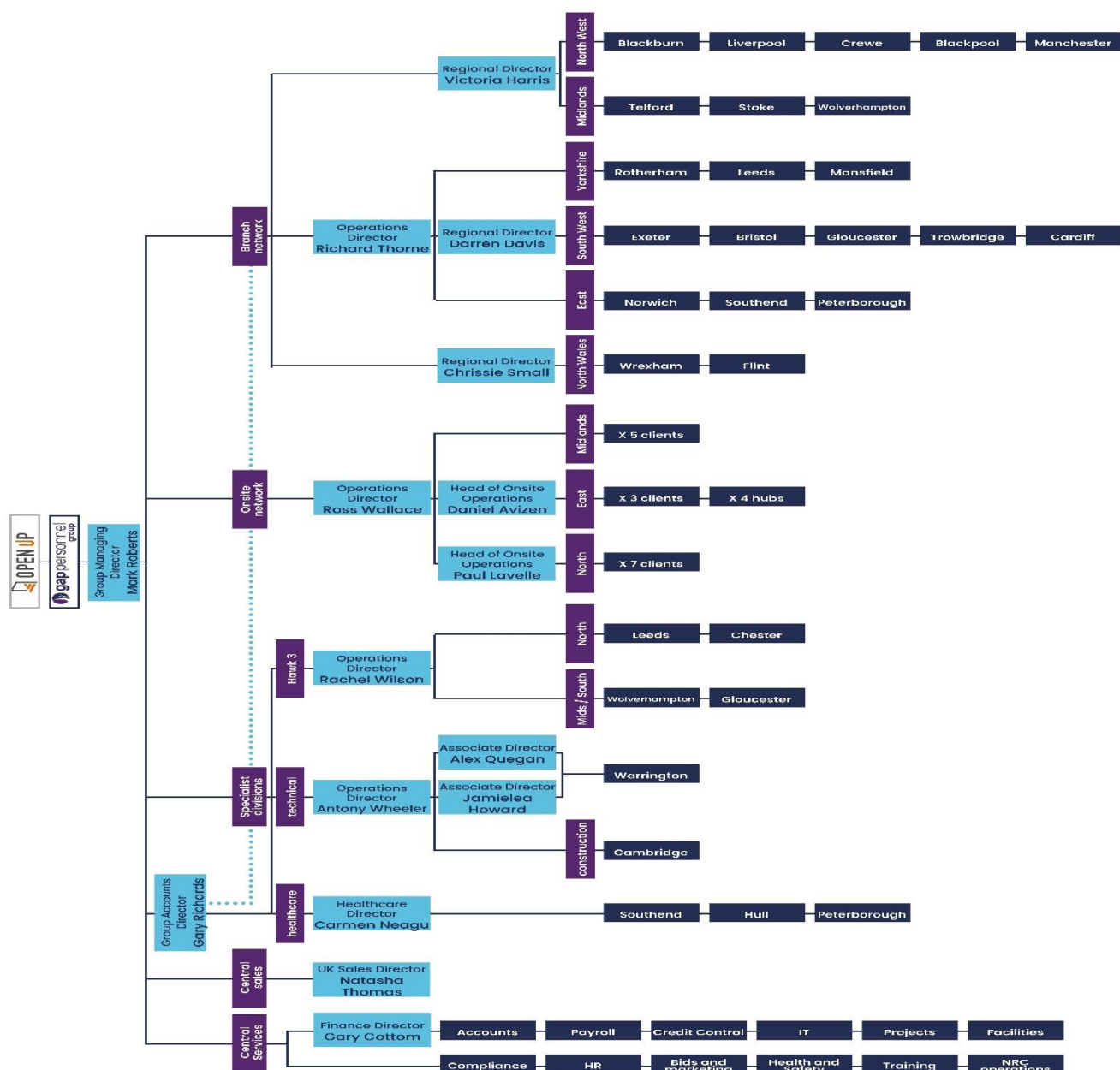
This policy is applicable to all offices and operations within The Company structure and footer.

MEMBERSHIPS, PARTNERSHIPS, ASSOCIATIONS AND CREDENTIALS

In recognition of the responsibility of The Company to our clients, candidates, employees and contractors, it is a fundamental value of The Company that all of its business and other practices be conducted at all times in compliance with all applicable laws and regulations of the countries in which it operates, its officiating bodies and associations. This is demonstrated by being GLAA licence holders (applicable to companies as detailed within the footer), working amongst the Compliance Intelligence Network CIN, which is a collaboration of Employment Businesses and Agencies within the UK with a shared focus to work together to help tackle modern slavery and assist in the rescue victims, and through our long-standing relationships with the following organisations:



COMPANY STRUCTURE



TACKLING MODERN SLAVERY AND HIDDEN LABOUR EXPLOITATION

The Company is committed to developing and adopting a proactive approach to prevent, respond to and remediate the risks of modern slavery, forced and debt-bonded labour, human trafficking and hidden exploitation within its workplaces.

Modern slavery is a broad term used to encompass offences that involve one person depriving another person of their liberty, in order to exploit them for personal or commercial gain.

Forced labour is all work or service that is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily.

Debt-bonded labour is where a person's labour is demanded as a means of repayment for a loan or service.

Human trafficking is the recruitment and transportation of persons by threat, force, coercion or other abuse of power or vulnerability to achieve the consent of a person having control over another person for the purpose of exploitation.

Hidden labour exploitation is action up to and including modern slavery which involves the exploitation of workers and job applicants by internal or external individuals without the sanction or explicit knowledge of the employer or labour provider. It includes forced labour and human trafficking for labour exploitation; payment for work-finding services and work-related exploitation such as forced use of accommodation. It is understood that it is often well hidden by the perpetrators with victims, if they perceive of themselves as such, reluctant to come forward.

COMMITMENTS

The Company shall:

1. Designate appropriate managers from the internal compliance team to attend “Tackling Hidden Labour Exploitation” training and to have responsibility for developing and operating company procedures relevant to this issue.
2. Accept that job finding fees are a business cost and will not allow these to be paid by job applicants.
3. Not use any individual or organisation to source and supply workers where they:
 - a. Have not been signed off by the central compliance team following successful completion of The Company Supplier Due Diligence Process
 - b. Do not hold a valid GLAA licence, save where a valid exemption of GLAA requirement is approved by the central compliance team
 - c. Have not confirmed that workers are not being charged a work finding fee.
4. Ensure that all staff responsible for directly recruiting workers are trained to be aware of issues around third-party labour exploitation and signs to look for and have signed the appropriate Recruiter Compliance Principles policy document.
5. Ensure that labour sourcing, recruitment and worker placement processes are under the control of trusted and competent staff members.
6. Adopt a proactive approach to reporting suspicions of hidden worker exploitation to the Gangmasters Labour Abuse Authority (GLAA) and police.
7. Provide information on tackling “Hidden Labour Exploitation” to our workforce through the sending of Stronger Together leaflets as part of the onboarding process specifically contained within the ‘welcome email’ and displaying the Stronger Together posters in all of our offices and onsite operations.
8. Encourage workers to report cases of hidden third-party labour exploitation, provide the means to do so and investigate and act on reports appropriately.
9. Positively encourage and support employees and agency workers to report such exploitation which may be occurring within their communities by training all internal staff on how to spot the signs of Modern-Day Slavery as part of our internal corporate induction.
10. Require labour providers and other organisations in the labour supply chain to adopt policies and procedures consistent with the above.
11. Endeavor to collaborate with clients and create new partnerships to join together to tackle modern slavery, share intelligence where permitted and strengthen our network to identify, assist and support victims of modern slavery.
12. As part of our commitment to be open and transparent and to report in line with recognised good practice The Company will produce and publish annually a Modern Slavery statement available on our website and gov.uk.

MANAGING RISK

We understand that conducting thorough practices and applying due diligence in advance of any engagements we enter into, whether they be with clients, applicants or third-party suppliers, is critical to managing the risk of modern slavery and hidden labour exploitation occurring within our business and/or our supply chains. Irrelevant of our suppliers’ own policy or process in relation to modern slavery, all external business partners, affiliations and suppliers of The Company are expected to familiarise themselves with our Modern Slavery Statement and associated policies and commitments and operate themselves in a manner which supports our methodology and vision of eliminating the exploitation of people under the Modern Slavery Act 2015 and ensuring this does not occur within our supply chain.

DUE DILIGENCE – SUPPLIERS

Our supply chain is categorised as High, Medium or Low risk, determined by the nature of the supplier’s business operation. Suppliers categorised as High Risk are those that have the most direct connection to or involvement with workers such as second tier labour suppliers. All High-Risk suppliers are required to undergo annual audits, where any issues or cause for concern are identified, further investigation and remedial actions will be taken, and a re-audit scheduled and completed. Failure to rectify issues identified and/or where the severity of the issues identify are deemed necessary, supplier arrangements will be ceased without notice. Our full Supplier Due Diligence process will be shared with employees as part of our internal training process and externally with clients and/or suppliers as part of an audit process.

DUE DILIGENCE – APPLICANTS

As a front-line Recruitment Agency, we acknowledge that we are in an ideal position to not only increase applicants’ awareness and understanding of modern slavery, but to ensure through detailed practices that we can identify early on within our recruitment process any potential victims and reduce the exposure of our business to instances of modern slavery. There are a number of measures and procedures that have been implemented into our recruitment process, our full Applicant Onboarding process will be shared with employees as part of our internal training process and externally with clients and/or suppliers as part of an audit process.

DUE DILIGENCE – WORKER WELFARE

The safety and welfare of our workers is paramount to our business principles, as such, the below processes and practices have been designed, developed and implemented with the intention of ensuring our workers’ safety and welfare following placement with The Company and our clients. The below link details the measures and processes in place to effectively manage and monitor the exposure of our workers once placed. Our full Worker welfare and common details check process will be shared with employees as part of our internal training process and externally with clients and/or suppliers as part of an audit process.

DUE DILIGENCE - HEALTHCARE AND CONSTRUCTION

We recognize that Healthcare and construction are 2 of the industries that are facing a surge in cases of Modern Slavery and worker exploitation. A key issue in the Healthcare industry is the abuse of Sponsorship visas and rogue agencies charging overseas applicants for a certificate of sponsorship despite the company not being an approved sponsor themselves. The number of suspected reported Modern Slavery cases in the Healthcare industry has continued to rise rapidly since 2021.

For sponsored healthcare workers we have strengthened our process for completing right to work checks on all new applicants to include conducting an active check on the gov.uk website on the company listed on their certificate of sponsorship, to verify they are a legitimate and active sponsor prior to the approval of their right to work in the UK. We also conduct checks on the sponsors of all live workers on a monthly basis to verify that they are still listed as an 'active' sponsor on the gov.uk website.

Further sector specific training relating to the Construction and Healthcare sectors is scheduled to identify and establish further enhancement required to our due diligence processes currently in place to ensure the protection of workers.

TRAINING

In line with our commitment to identifying any potential signs of modern slavery, forced labour or human trafficking, and ultimately preventing labour exploitation from occurring within our operation, we have sourced, developed and undertake the following training programmes:

Internal Training

The Company recognises that its key resource is the people that it employs. We are committed to investment in our people, by providing training we aim to enhance performance and ultimately, productivity through empowerment to make the best use of an individual's natural ability.

- The initial training plan will be made up of in branch training, e-learning modules and attendance to classroom training for specific courses, including investigative interviewing skills sessions put together by as a bespoke training package for The Company by former GLAA investigators;
- Included within the E-Learning training sessions is an interactive module on spotting the signs of Modern Slavery which is to be completed by all new starters and refreshed annually;
- All new starters are asked to commit to preventing labour exploitation by signing and agreeing to the 'Recruiter Compliance Principles' document viewable in The Companies Recruitment and Engagement Policy & Process handbook;
- All internal training courses are informally refreshed and updated as required to ensure the content remains current.

The aims of internal training are to:

- Ensure that all staff responsible for directly recruiting workers are aware of issues around third-party labour exploitation and signs to look for to help spot potential cases;
- Upskill all staff responsible for directly recruiting workers in regard to investigative interview skills, critical to establishing a full understanding of an individuals background / journey which lead them to the recruitment service;
- Ensure that labour sourcing, recruitment and worker placement are under the control of trusted and competent staff members;
- Adopt a proactive approach to reporting suspicions of worker exploitation to the GLAA and the police.

External training

- Our Compliance Team members that specialise in Social and Ethical Compliance have attended "Tackling Modern Slavery in Global Supply Chains" and "Tackling Modern Slavery in UK Businesses" hosted by Stronger Together;
- Regular attendance to ALP and Stronger Together Roadshows and/or webinars;
- External training is sourced and attended as required based on individual staff needs.

The aims of the external training are to:

- Ensure that our internal Compliance Team are up to date with current industry guidance and best practice processes so that they may effectively support our operational teams with situations that may arise;
- To identify new methods and processes that can be implemented into our business, ensuring a proactive approach to tackling modern slavery within our organisation and that of our supply chain.

2023 PERFORMANCE AGAINST MODERN SLAVERY OBJECTIVES

The company objectives for 2023 and performance against those is indicated below (∞ indicates an objective that is still in progress):

- ∞ Investment of half a million GBP into the development and roll out of our new Candidate Registration System (CRS) which will incorporate features such as facial recognition technology, bank validation, automation of common details checks and dynamic interview questioning in relation to Stronger Together and the identification of potential modern slavery victims during the onboarding process;
- ✓ Implementation of communication to applicants and workers regarding the "Just Good Work" app which seeks to provide individuals in their own language critical information about working and their rights in the UK;
- ✓ Delivery of annual refresher training across The Company network in relation to Modern Slavery, Investigative Interview Techniques, GDPR and Health and Safety;
- ∞ Identify and undertake sector specific training relating to the Construction, Healthcare and Driving, to establish and implement any additional methods to incorporate into our Modern Slavery policies and procedures across these divisions;
- ✓ Progressing our Responsible Recruitment status to Advanced Business Partner;
- ∞ Establish relationships with anti-slavery organisations / charities to further strengthen The Company's knowledge, exposure and continued education on the topic and strategy of tackling modern slavery.



Submitted in excess of 20,000 Stronger Together Questionnaires to workers



Removed 1 labour provider from our Second-Tier supplier list



Assisted 4 clients with their internal investigations into potential cases of forced labour and illegal working



Devised 2 new initiatives for our 2024 objectives, Client Collaboration and Low Risk Suppliers strategy.

2024 MODERN SLAVERY OBJECTIVES

The company objectives for 2024 to further strengthen our approach to tackling Modern Slavery include:

1. Continued investment into further development of our Candidate Registration System (CRS). To incorporate 2-way API with our CRM system extending the automation of common details checks across all systems data and implementing the dynamic interview questioning which could not be achieved for the initial implementation to enhance the current mechanisms in place to identify potential modern slavery victims during the onboarding process;
2. Delivery of annual refresher training across The Company network in relation to Modern Slavery, Investigative Interview Techniques, GDPR, Fraud Prevention, Health and Safety, Mental Health and Wellbeing, Equality and Diversity and unconscious bias;
3. Roll out sector specific training relating to the Construction and Healthcare, to nominated employees of those sectors to provide support at a local level to the central compliance team to ensure additional processes to be incorporate into our Modern Slavery policies and procedures across these divisions are done so with the full support of local teams;
4. Continue to establish relationships with anti-slavery organisations / charities to further strengthen The Company's knowledge, exposure and continued education on the topic and strategy of tackling modern slavery;
5. Review our supplier due diligence process and audit process, implementing any additional processes as identified within the review;
6. Host Modern Slavery Seminars for clients to increase awareness and strengthen the safety of workplaces to which our workers are supplied;
7. Circulate mailers about How to become a Stronger Together Business Partner to all Low risk Suppliers within our supply chain to increase knowledge and awareness at this level;
8. Launch our Modern slavery Client Collaboration Strategy with key clients. A programme which seeks to cross reference 'common details' of clients directly employed worker records with our temporary worker records. This process will ensure modern slavery alerts from common details checks are maximised compared to each organisation completing their own in isolation. Significant work has gone into establishing how this can be achieved without any risk of breaching GDPR, we are hopeful clients will embrace this collaboration strategy.

OVERVIEW

As a responsible corporate business, The Company aim to act in a socially responsible manner at all times, by respecting the economic, social, cultural, political and civil rights of those employed through our business, and by complying with human rights legislation and the Modern Slavery Act 2015. Since the publication of our previous Modern Slavery statements, The Company internal Compliance Team have made several changes to their training, systems, audits and standard business practices which have strengthened our operational understanding, awareness and process relating to modern slavery. Additionally, they have developed links with various external bodies and government authorities to ensure industry issues including illegal working prevention and labour exploitation are effectively managed and escalated where required.

We are proud upon publication of our 2024 statement to be able to demonstrate the effectiveness of the processes we have introduced into our business in relation to tackling modern slavery, human trafficking and forced labour exploitation. The successful identification of several cases of potential exploitation reinforces the dedication and commitment of our teams to tackling modern slavery. As a business, we are committed to continuous improvement and strive to identify new methods, processes and practices that can be incorporated into our business operations, ensuring the health, safety and welfare of our workforce. The commitment is demonstrated by the significant financial investment made towards the development and roll out of our new Candidate Registration System, for which we have more plans and investment allocated to further develop features which aim to identify and prevent modern slavery risks within our business.

Mark Roberts
Managing Director
01/07/2024

MODERN SLAVERY POLICY STATEMENT – VERSION 7 – 01.07.2024