

# MODERN SLAVERY POLICY

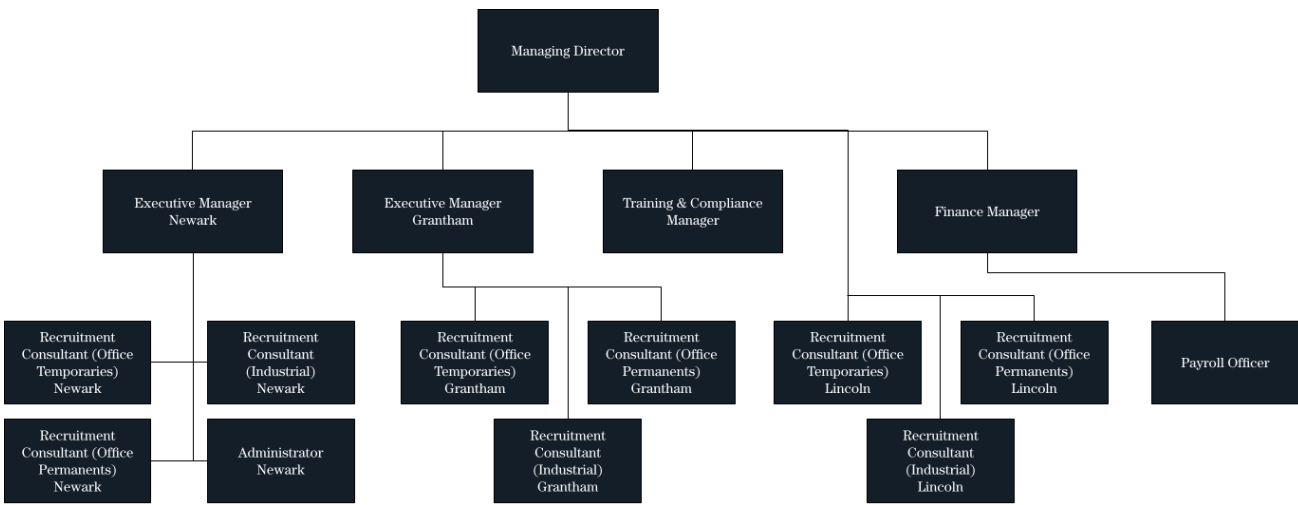
## 1. BACKGROUND

Reflect Recruitment Group is committed to eliminating Modern Slavery, Human Trafficking, forced labour and similar human rights issues.

As part of this effort, we have adopted a Policy on Modern Slavery (for the avoidance of doubt, the same policy applies to Human Trafficking, forced labour and any other similar issues).

Our appointed Manager responsible for Training & Compliance has received detailed training on identifying and resolving concerns around modern slavery and human trafficking. All other staff receive awareness-raising information around issues involving modern slavery and human trafficking, so they can bring any concerns they have to the attention of the Management.

## 2. ORGANISATIONAL STRUCTURE



## 3. POLICY ON MODERN SLAVERY AND HUMAN TRAFFICKING

As a small recruitment agency and employment business with a well-respected reputation in our local areas, we always strive to be a successful business that can provide career opportunities and employment for the local economy, along with assisting local companies to source and attract new talent.

In doing so, we recognise the need to be responsible for our part in stamping out modern slavery in our industry and therefore set clear expectations of our staff members, along with key stakeholders in our supply chain.

Modern Slavery and Human Trafficking have no place in our business or anywhere within our supply chain.

We will establish productive working relationships with our potential applicants (candidates), temporary workers, local employers (clients) and other stakeholders. These working relationships will be formed with a respect for individual rights, choices and freedoms.

We will always operate in an honest and transparent manner.

We will treat people fairly, with respect, courtesy and an appreciation for their individual diversity.

We will do all we can in our capacity to eradicate Modern Slavery and Human Trafficking.

#### **4. REPORTING PROCEDURE**

If a report is raised with a concern around Modern Slavery, Human Trafficking or forced labour, the Senior Leadership Team commit to ensure that all investigations will be prompt and effective. If our internal investigation reveals any issues, we will take appropriate action, such as:

- Working with the appropriate organisations to improve standards
- Removing those organisations from our preferred supplier list
- Passing on details to the appropriate law enforcement bodies

#### **5. WHAT WE ARE ALREADY DOING**

- Our policies and documentation, to include but not limited to; our Contract for Services with an Agency Temporary Worker, our Terms of Business for the Supply of Agency Temporary Workers and our Terms of Business for the Introduction of Permanent and Fixed Term Contract Staff all comply with relevant laws, including the Modern Slavery Act 2015.
- We comply with all National Living Wage legislation valid at the time of agreeing new job opportunities with our candidates and during such time that we continue to employ them.
- We run our payroll operation entirely in-house and do not utilise Umbrella or Third-Party payroll providers.

- We treat our candidates fairly and strive to obtain job opportunities and temporary assignments that will meet their needs, at fair pay rates and salaries that will meet their desires.
- We strive to work with local companies who pay their staff a fair wage for the job they are enlisted to do.
- We take a proactive approach in complying with similar regulations such as the Agency Worker Regulations 2010, with regards to the statutory entitlements for which agency workers are eligible after the relevant period.
- We recognise where potential signs of unfairness lie, such as the right not to work more than 48hrs in a week, unless the worker has chosen themselves to opt out of the Working Time Regulations 1998. We respect the need for fair pay rates for our workers and their right not to be discriminated or harassed in the workplace.
- We strictly adhere to Home Office regulations on checking Right to Work in the UK.
- We only interview applicants in an approved location.
- We do not allow applicants to register or complete registration documents on behalf of others.
- We do not loan any personal money or accept money or favours from applicants or workers.
- Applicants and Workers are not charged a fee for work finding services. Where we are aware that an applicant has paid a fee to a third party in return for assistance finding employment, we will act accordingly in line with this policy.
- We only allow our direct contacts within a client company to decide which workers are selected for work shifts.
- We do not force or coerce temporary workers to work against their will. We strive to find suitable employment opportunities for our job applicants, but they are not obliged to accept any or every offer.
- We require approval from the temporary worker in question if they request their wages to be paid into a bank account that is not theirs. We take further investigations if there is a concern as to the nature of this request.
- We record and report if job applicants or workers appear frightened, agitated or secretive, malnourished or unkempt.
- We record and report if workers are delivered to and collected from work and the nature of the type of vehicle, the details of the driver and other passengers.

- We ensure job applicants can speak for themselves and conduct a clear conversation in English.
- We record and report if groups of workers suddenly stop working or disappear for no apparent reason.
- We provide Modern Slavery training to new staff members that join the Reflect Recruitment Group team, ensuring they know the signals and potential hazards of applicants or candidates we work with being subjected to Modern Slavery or Human Trafficking.

## **6. WHAT MORE CAN BE DONE**

While we believe we have an effective and thorough approach to eradicating Modern Slavery and Human Trafficking, until Modern Slavery and Human Trafficking are a thing of the past, there is always more that can be done and ways we and our key stakeholders can improve.

- We review our Modern Slavery and all similar policies at least annually, learning where we can make improvements in our processes.
- We are accountable to the GLAA (Gangmasters and Labour Abuse Authority), are licence holders of them and are also members of the ALP (Association of Labour Providers) and the REC (Recruitment and Employment Confederation) all of whom keep us up to date on changes in the Modern Slavery and Human Trafficking legislation and proactive steps we can take to improve.
- We will continue to be approachable to our applicants and candidates, we promise to keep aware of potential signals of abuse and trafficking.
- We have installed a Training & Compliance Manager who is directly responsible for compliance with all policies and procedures.
- We will promise to be ready to listen to any concerns that our candidates have. We will provide a listening ear and will ensure to take appropriate action where necessary.
- Applicants, Candidates, Clients and key stakeholders are all welcome to approach us on an anonymous basis to raise concerns if they wish.

## **7. OTHER RELEVANT POLICIES**

We have other policies which are related directly or indirectly to Modern Slavery and will make them available on request:

| Policy Name                        | Reviewed |
|------------------------------------|----------|
| Anti-Bribery and Corruption        | Annually |
| Anti-Harassment                    |          |
| Code of Professional Practice      |          |
| Complaints & Disputes              |          |
| Customer Service                   |          |
| Data Protection Policy & Procedure |          |
| Equal Opportunities                |          |
| Modern Slavery <i>Statement</i>    |          |
| No Child Labour                    |          |
| Responsible Recruitment            |          |
| Whistleblowing                     |          |

## 8. ADHERENCE TO THIS POLICY

Adherence to this policy is regularly reviewed and monitored for any required changes by Paul Squires, Training & Compliance Manager.

This policy will be reviewed at least annually and is correct at the time of writing.

This policy has been approved by the Senior Management team.



Paul Squires  
Training & Compliance Manager