

# Prevention of Modern Slavery and Human Trafficking Policy

## PURPOSE OF THIS POLICY

**Modern slavery is a global and international crime affecting millions of people worldwide, including many victims within the UK. Men, women and children of all ages and backgrounds are victims of human trafficking, forced labour, domestic servitude or debt bondage.**

**This document sets out the policy of Gi Group Recruitment Ltd with respect to preventing opportunities for modern slavery to occur both within its own and its supply chain's daily business activities. This fulfils our obligation under section 54 of the Modern Slavery Act 2015.**

## BUSINESS OPERATIONS

The GI Group is one of the world's leading companies providing services to the development of the labour market. The group is active in the fields of temporary, permanent and professional staffing, search and selection, executive search, outsourcing, training, outplacement and HR consulting.

The UK brands that this policy applies to are Gi Group Recruitment Ltd, Marks Sattin, INTOO and TACK UK.

## RESPONSIBILITY FOR THIS POLICY

Ultimate responsibility for the implementation of this policy rests with the Executive Management Team (EMT) and the Training, Compliance and Human Resources Departments of the company.

This policy covers the financial year January to December 2018.

## RISK ASSESSMENT PROCESS

During quarter 4 of 2018 we completed our annual modern slavery risk analysis which clarified the following specific areas of risk in relation to our day to day business activities:-

- Internal employees (temp or perm) working directly with a Gangmaster (GSTR) out of choice or necessity
- Existing temporary workers acting as a liaison between ourselves and a GSTR
- Client employees acting as a liaison between ourselves and a GSTR
- Second tier supplier knowingly working with a GSTR
- Second tier supplier unknowingly working with a GSTR – no supplier control
- Key supplier knowingly sourcing goods with slavery in the supply chain
- Key supplier unknowingly sourcing goods with slavery in the supply chain – no supplier control
- Suppliers sourcing goods from high risk countries
- Suppliers providing goods and services at rock bottom prices
- Suppliers utilising agencies themselves or within their primary supply chain

With regards to the supply of temporary and permanent staff we have focused our attention on 25 customers who present the highest risk. These companies have been selected by using specific criteria which highlighted particular risks, such as, volume and frequency of the staff supplied, the location of the company's site and the nationalities of the temporary and permanent candidates that are being supplied.

## PREVENTION

Taking the key areas of risk into account, we aim to prevent opportunities for occurrences of modern slavery by focusing on 3 business activities:

1. Development of policy/codes of practice
2. Raising awareness
3. Effective process implementation/consistent auditing

## POLICY/CODES OF PRACTICE

Our key policies and codes of practice which relate to the prevention of modern slavery are:

- Gi Global Code of Ethics
- Ethical Recruitment Policy
- Preventing Hidden Labour Exploitation Policy
- Anti-bribery Policy
- Public Interest Disclosure Policy
- ETI Base Code
- Stronger Together Initiative Code of Conduct
- Second Tier Supplier Agreements

## RAISING AWARENESS

### *Permanent Employees*

All of our operational permanent employees are made aware of our policies and internal process relating to the prevention of modern slavery as part of the core operations training programme.

Classroom and on the job training is supported by specific online modules and substantial guidance and reference material which can be located on GiNET. During 2018 we delivered training to 206 employees.

Our commitment as a Stronger Together Business Partner along with our active participation as members of the Association of Labour Providers, the Recruitment and Employment Confederation and the GLAA Labour Provider/User Group open up essential communication channels which enable us to provide a consistent flow of up to date information and support tools.

Strong central control supports the operational network and therefore the Head Office team are clear about the standard checks and subsequent reports that they need to make and produce which

may in turn lead to the identification of potential issues.

### *Temporary Workforce*

Initial awareness is raised by playing the Stronger Together video as part of the recruitment process. Additional Stronger Together resources, including advisory posters and leaflets, are placed in prominent positions within all of our locations.

A temporary worker's welfare also forms an essential part of the initial interview process and then the ongoing relationship that we have with them. Workers will be encouraged to report any concerns that they have at any time during their relationship with us, including confidential issues.

We also provide formal communication channels via worker interviews during the internal audit process, central satisfaction surveys and our modern slavery helpline.

Our time and attendance systems safeguard against worker substitution. Processes are in place to identify duplicate bank accounts and home addresses to support the existing monitoring carried out by the payroll team.

### *Suppliers*

We have placed suppliers into two categories:

- **Category 1:** second tier suppliers who supply temporary workers to our operational locations
- **Category 2:** those who supply general goods and services to Head Office and the operational network

**Category 1:** we consider second tier suppliers of temporary staff to be a higher risk as they will face the same key issues as we do ourselves. Prior to being approved, all potential suppliers will be issued with the Supplier Code of Conduct, complete the standard supplier questionnaire and sign a second tier agreement document. Where required they will undergo an audit of their internal process prior to supplying temporary staff. Depending on the frequency of the supply, second tier agencies will also be subject to audits from our internal team. The aim of the audit is to ensure that a second tier supplier is implementing the commitments detailed within their own statement or policy. We use the Stronger Together labour provider implementation checklist to benchmark the current process that each supplier has in place and this will also support the suggestions for actions that can be taken to

make improvements to what they already have in place.

**Category 2:** operating predominantly as a service provider, the range of goods and services that we purchase is relatively limited however this does not mean that we underestimate the opportunities for occurrences of modern slavery from within our supply chain. We have identified our top 30 suppliers to be our main area of focus. The top 30 are issued with our Supplier Code of Conduct and requested to complete our supplier survey on an annual basis. Once complete, our supplier risk profile is updated with any specific issues being raised on a supplier by supplier basis.

## **EFFECTIVE PROCESS IMPLEMENTATION AND CONSISTENT AUDITING**

Establishing policy and procedures and raising awareness by delivering training and establishing effective communication channels creates the framework for the prevention of modern slavery and is a natural starting point.

Consistently checking that the theory is being implemented practically on a daily basis establishes the current effectiveness of the framework and will also identify improvements which can be made. All operational locations have the initial responsibility for ensuring that all of the key processes are implemented and that the relevant checks are taking place. Our central audit team carries out the following audits during the course of a trading year, in relation to the prevention of modern slavery:

- Pre-arranged operational location audits (including temporary worker interviews)
- Pre-arranged audits of live recruitment and induction sessions
- Spot check operational location audits
- Spot check remote operational audits (including RTW)

- Spot check remote audits of effective use of relevant IT equipment
- Pre-arranged Head Office-specific right to work in the UK audits
- Temporary worker complaint audits
- Second tier/supplier audits

Our temporary worker management systems enable us to take regular snapshots of the diversity of the nationalities that we currently have working at all operational locations. This enables us to identify any unusual patterns or concerns relating to nationalities which may pose the highest risk.

During 2018 our audit process resulted in two direct referrals to the GLAA. We believe that the activities which have taken place during 2018 have been an improvement on those that were previously in place. During 2019 we are aiming to work more closely with both our highest risk customers and second tier suppliers to ensure that strategies and activities become more aligned.

Results of the above are collated and reviewed by the Executive Management Team and subsequently are made available to all internal employees. The Group Compliance Manager / Head of CSR has the direct responsibility for reviewing/evaluating any central reports with a view to identifying, communicating and addressing any potential areas of concern both internally and with the relevant external authority when it is necessary to do so.

## **REVIEW**

Following its initial introduction, this Prevention of Modern Slavery and Human Trafficking Policy will be reviewed by the Executive Management Team at least annually and may be reviewed from time to time.

Signed: Bev White – CEO, 02 January 2019

