

# MODERN SLAVERY STATEMENT 2021-2022

### 1 Introduction

Staffline Group PLC ("Staffline") is at the forefront of recruitment and creating exciting new opportunities within employment, it is our responsibility and throughout our workers journey we aim to disrupt exploitation, tackle Modern Slavery, and maintain worker welfare at the heart of everything we do.

The coronavirus (Covid-19) global pandemic has created a swathe of unprecedented scenarios for all companies and communities worldwide. It has left people vulnerable and facing hardships which in turn creates opportunities for exploitation and Modern Slavery. At Staffline, we have a zero-tolerance approach to slavery and human trafficking. We consider working to prevent Modern Slavery from happening as one of our highest priorities. We continue to work with other businesses and agencies that take it as seriously as we do, embedding the standard checks through our business model and doing whatever we can to protect our workforce and those of others to help eradicate this terrible crime.

In 2020, we assisted with **57 investigations** into Modern Slavery with the authorities, leading to the rescue of **19 potential victims** of slavery.

We feel honoured to work with amazing charities year after year, assisting as many survivors of Modern Slavery back into a workplace, another 16 placed last year with Staffline. The work we do with police forces across the UK and the anti-slavery networks help us to assess our current checks, evolve and strengthen them, learning from others is a hugely valuable insight for the compliance team, sharing key learnings is an integral part and can only get better with the spread of experience and collaboration with other businesses. It helps us make our business a safer place for our workers and more robust checks to protect them and their families.

## 2 About us

Established in 1986, Staffline is now the UK's largest recruiter and workforce provider, delivering OnSite workforce solutions to leading brands. We work in partnership with clients and candidates, meeting business needs and matching people with opportunities. Our vision is **to be the UK's most trusted recruitment business**.

We specialise in large-scale recruitment, providing teams to help businesses succeed. Our support is flexible to meet changing demands.

Our OnSite services are our main offering. We support a range of sectors including automotive, manufacturing, food production, logistics, and driving. We're based at over 400 sites nationwide and find work for over 42,000 people each day.

Thanks to our industry-leading technology, we now have an unrivalled database of eligible workers and the means to engage them. This alongside 'Have Your Say' our experience management platform, ensures the highest levels of worker satisfaction and drives increased worker retention. We will continue to invest in both our technology and experience solutions and ensure that we remain the trusted market leader.

Our culture and philosophy are encapsulated within our brand purpose, of **Enabling people into good work.** 









# 3 Training & awareness

We recognised that in Covid-19 times, there was a clear danger of labour exploitation being hidden more than ever, especially following the closure of some businesses and exploiters looking for alternative sectors to infiltrate, so it was hugely important for us to remain vigilant. We may not have seen as many workers face to face as we would normally, but we kept as close as we could virtually to support them and report any concerning signs.

Being business partners with the Stronger Together initiative and the Responsible Recruitment Toolkit has helped us keep the profile raised keeping it high on ethical agendas throughout our supply chain.

Our central compliance team has worked remotely throughout last year, except for our Investigators that have sometimes needed to attend our sites, in a safe and Covid secure environment following leads of potential labour exploitation.

In 2020, Staffline updated our Modern Slavery eLearning training and refreshed all our staff through new IT systems and our brand-new learning platform, accessible to all, instilling the importance of worker welfare right from our core.

All of the Staffline teams, operationally out in the field, and centrally based in Nottingham, are all aware of the impacts of Modern Slavery on individuals, and are fully comfortable co-ordinating with the compliance team to report any concerns. It forms an integral part of our welcome day for all new team members beginning their careers with Staffline.











# 4 Collaboration

All cases or suspicions of Modern Slavery are fed into the GLAA and / or local police forces in the first instance, and we work with other enforcement authorities and charities along the way in each case, to help the victims identified to get the remediation and assistance that they need, and do what we can help the police find the criminals behind the cases.

We thoroughly enjoy working collaboratively with charities and organisations namely Migrant Help, Hope for Justice, Spring Housing, The Jericho Foundation, The Sophie Hayes Foundation & City Hearts. We feel humbled to be a small part of their work being in a position to be able to offer work placements to survivors to help them positively restart their lives.

In 2020, it was great to work with the anti-slavery networks which build year on year and expand to more members from different organisations increasing their reach to so many that share the passion with Staffline to do our very best in helping spot and rescue potential victims of slavery.

We continuously work closely with OnePay, an approved alternative payment solution for our workers, to ensure that any suspicions of Modern Slavery or other means of fraudulent usage of accounts are investigated swiftly and comprehensively.

We are extremely proud that other organisations have used our workers' rights leaflet to help spread the word and inform more people to know their rights and understand more about what to expect from working in the UK. We are committed to launching new campaigns this year which we will happily share for others to use as a wider spread is more useful to get the messaging out to help more people.

Working with our clients and those in their supply chains to raise awareness and keep the subject alive is a strong passion of ours and we welcome new conversations and building new relationships with all to do the right thing, and make a difference.

The Compliance Intelligence Network that we started at the end of 2019, is growing with more members wanting to join us to share high-level intelligence and help eradicate labour exploitation in the UK together. We look forward to seeing how many more will join us throughout this year.

This has been a pivotal working collective which has, and continues to, develop clear communications, share knowledge, and best practice. With a team mindset and collaboration at the core to be stronger together in tackling Modern Slavery.









# **5** Policies & Processes

We follow the Responsible Recruitment Toolkit model to align our policies and reflect the principles of protecting the welfare of our workers. Looking after their wellbeing is at the core of our business and reflected throughout our company values.

Each case gives us valuable learning, and feedback from all of our partners organisations that we work with, to help improve our processes to strengthen them and create new checks as soon as we hear how the traffickers are evolving and learning new ways to infiltrate businesses like ours and those around us.

We continue to invest in our IT systems to help us run checks throughout our whole database, providing valuable information to the enforcement authorities when requested, for assistance with cases. New bespoke reports will be used, tweaked and changed to be fit for purpose to help us identify more potential victims of trafficking tracking throughout a worker's journey, to identify potential signs of Modern Slavery.

We check for any patterns with other workers details to look for signs of sharing, watch out for anomalies and trends along with and investigating any areas of concern, as our earliest opportunity.

We use a variety of communication methods to deliver Modern Slavery and worker welfare strategies and monitor data to improve our operations and worker experience. Our staff and our workers are integral to our strategy to identify Modern Slavery, exploitation, and worker welfare concerns.

Working better with the local councils, we do what we can to link up with them to investigate further any houses of multiple occupancy and any overcrowding issues that arise from these alerts, as we recognise that this is a common symptom of potential Modern Slavery.

Our internal audits ensure Modern Slavery information is displayed in all our offices and staff are familiar and complying with Staffline policies and processes to protect worker welfare. Material from the GLAA and Stronger Together in various languages delivers that clear strong message to encourage workers to report in any concerns.

We maintain a centralised repository of company policies, ensuring all of our staff have access and visibility of company policies. We regularly review and communicate via multiple digital methods policy updates and company principles.

Our internal reviews implement continuous improvement plans including updating our Modern Slavery Statement to comply with the UK Government statutory guidance to cover six key pillars, as defined in this statement by the different section headings, and driving effective change to continue to tackle Modern Slavery across our business

Our internal compliance investigations team review root causes of all cases, and continuously implement improvements to our checks and training modules across our business to our frontline staff. Where appropriate we endeavour to remedy and support any individuals to seek justice and compensation where we have disclosures and evidence of exploitation having taken place.









# 6 Risk assessment & management

Staffline will endeavour to assess our risks and transparency throughout our business to identify and establish a company-wide compliant approach to Modern Slavery management.

Working with non-governmental organisations (NGO) and Modern Slavery experts we utilise the insights to assess risk and impact to our company and workforce.

Furthermore, our robust approach in training, communicating, and supporting all our workers to report any concerns; alongside our data analysis and reviews of risk, provide a valuable overview of our business position. Allowing us to continually drive improvement and development.

We recognise that it's important for partners in our supply chains to have robust checks in place to help prevent labour exploitation, and processes to show how they tackle cases following identification of concerns. We are committed to working closer to others, learning from their cases and using gap analysis studies to identify weaknesses and strengthen controls.

Keeping our worker welfare checks as an always evolving piece of work is the key to mitigate the risk of labour exploitation taking place, assessing the risk levels at regular intervals. Keeping up to date with the new ways that crime gangs use to infiltrate businesses using shared knowledge to address those risks and fortify the checks made throughout our systems and workforce.

# 7 Measuring effectiveness

Our methods to tackle Modern Slavery and assess effectiveness involve the following activities:

- We assess and measure proactive cases identified across our business as we actively encourage and support our staff to speak up if they see any red flags
- Evaluate risk related activities including emerging risks relating to Covid-19
- Continuous improvement plans for staff training and development to increase knowledge and awareness to improve compliant, ethical practices
- Strengthen networks that support our ethos to eradicate Modern Slavery
- Review supply chain transparency and risk across the business and our clients
- Keep the subject alive by sharing headlines from cases in the UK, key learnings shared by the enforcement authorities
- · Keeping our workers at the heart of everything we do
- All of our compliance team are on a continuous learning path keeping linked into the SMEs including the front line charities that help victims of trafficking picking up key information.









# 8 Our commitment & summary

We remain fully committed to compliance and high levels of ethical standards and strive to do more to help rescue potential future victims of Modern Slavery.

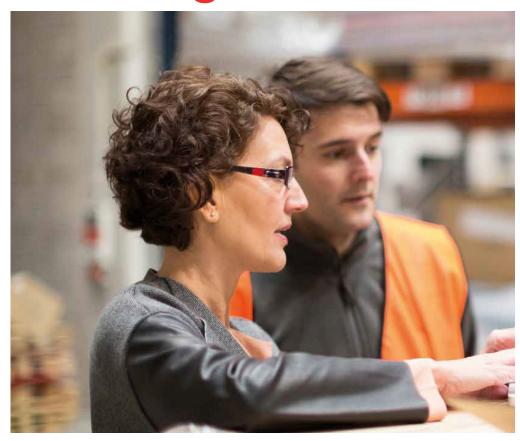
Whilst we have established well tested successful processes embedded in Staffline, we will continually review and strengthen using knowledge learnt and intelligence shared.

We are reassured that the scale of our business can be extremely helpful to link with our partners outside of our industry to help tackle Modern Slavery and raise awareness across all regions of the UK, and we welcome all partnerships and will always do what we can to help protect workers from this horrific crime.

Keeping the communication channels open to encourage our workers to approach us any time to have the confidence to report exploitation, and using our superb new learning platform and SharePoint to escalate messages throughout our business to keep the conversations flowing will be key to engage more internally.

Staffline will continue to assess our risks and transparency throughout our business to identify and establish a company-wide compliant approach to Modern Slavery management.

Signed:



Albert Ellis
Chief Executive Officer







