

Policy on Tackling Modern Slavery and Hidden Labour Exploitation

Policy Statement.

Total Recruitment Solutions Ltd is a trusted small Recruitment Agency operating across mainland UK. We specialise in industrial recruitment but are equipped and have experience in placing workers across various sectors both on a temporary and a permanent basis. We also offer bespoke HR solutions and our team include experienced and seasoned recruitment consultants and HR advisors.

Total Recruitment Solutions Ltd commits 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.

This statement is made in line with the requirements of section 54 of the Modern Slavery Act 2015 and sets out the steps that Total Recruitment Solutions Ltd has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Total Recruitment Solutions Ltd has a zero-tolerance approach to Modern Slavery and the following policy sets out the Company's position on Tackling Modern Slavery and Hidden Labour Exploitation. This has been approved by our company Director in April 2024 and will be continuously monitored by our Modern Slavery Champion.

Introduction to Modern Slavery

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.

The Scale of the Problem

Within the UK according to the National Crime Agency, referrals for modern slavery and human trafficking have increased: in the year ending December 2022, 7936 referrals were made for potential victims of exploitation that has taken place solely in the UK, an increase of 10.3% on the previous year.¹

Globally in 2021 49.6 million people on any given day were living in Modern Slavery. That is one of every 150 people in the world.²

There are several key UK risk factors which increase the risk of exploitation. These include, cost of living rises, labour shortages and the UK immigration System.

Total Recruitment Solutions Ltd understand and recognise the need to raise awareness and take proactive and ethical steps to prevent all aspects of modern slavery.

Scope

This Policy encompasses all our head office staff and our agency workers across the United Kingdom where Total Recruitment Solutions Ltd currently operates.

Responsibility

TRS has an appointed Modern Slavery Champion who has attended the Stronger Together Training course and who is responsible for the development and deployment of this policy across our Recruitment Consultants and Administration Personnel.

Policy Commitments

Total Recruitment Solutions shall:

1. Have a designated Modern Slavery Champion who has attended the 'Tackling Hidden Labour Exploitation' training and who has responsibility for developing and operating company procedures relevant to this issue.
2. Establish a 'Workforce Incident Management Team' who can respond to suspected Modern Slavery incidents during all operational hours.

¹ <https://www.nationalcrimeagency.gov.uk/what-we-do/crime-threats/modern-slavery-and-human-trafficking>

² <https://www.stronger2gether.org/>

3. Develop and Implement a Tackling Modern Slavery and Hidden Labour Exploitation Policy which details the processes we will take to prevent these practices, and steps we will take where they are identified.
4. Ensure that all staff who are responsible for the sourcing and placing candidates are aware of the issues and signs of hidden worker exploitation and have signed the Code of Practice for the Responsible Sourcing and Supply of Workers.
5. Accept that job finding fees are a business cost and will not allow these to be paid by job applicants.
6. Develop a Modern Slavery Response Plan including the development and implementation of a Workplace Incident Procedure.
7. As part of our onboarding process, we shall provide information to our candidates about the principles of Tackling Hidden Labour exploitation, and we shall display Stronger Together posters in all our offices.
8. Provide the means to and encourage workers to report cases of hidden third-party labour exploitation. Investigate and act on reports appropriately.
9. Proactively work with and report to the Gangmasters and Labour Abuse Authority, and Police where hidden worker exploitation is suspected.
10. Conduct regular welfare checks with our workers and enable workers to report issues confidently via our whistleblowing policy.
11. Conduct due diligence checks to identify and assess any potential modern slavery risks in our supply chains.
12. Take appropriate action to address any risks identified and work with our suppliers and partners to improve their practices.
13. Regularly review our policies and processes to ensure that they remain current and effective in preventing modern slavery and human trafficking.
14. Offer protection to our employees against any human rights violations, their freedom of movement and association, against unfair recruitment practices and ensure they have access to internal and external grievance mechanisms.

Total Recruitment Solutions Ltd and Stronger Together

Total Recruitment Solutions supports Stronger Together, a multi-stakeholder initiative aimed at reducing modern slavery, particularly hidden forced labour, labour trafficking and other hidden third-party exploitation of workers.

Labour providers and recruiters play a vital role in our economy, supplying the workforce that keeps industry operating. However, labour supply chains and the workers within them are vulnerable to hidden exploitation by third parties and organised criminal gangs who may infiltrate recruiters and labour providers management teams, their applicant pool, and even their clients.

These exploiters are well versed in the “tricks of the trade” to identify and control vulnerable jobseekers, placing them in conditions of debt bondage or forced labour for their own personal gain. Businesses are often unaware and may not be alert to the signs that this is occurring.

The Modern Slavery Act requires UK businesses over a certain size to disclose each year what action they have taken to ensure there is no modern slavery in their business or supply chains.

Stronger Together provides specialist, in-depth practical advice and resources for proactive measures labour providers and recruiters can take to address the risks of modern slavery and hidden labour exploitation in their own business and throughout their labour supply chains.³

As a business we invest in Stronger Together Training and have a dedicated Modern Slavery Champion who with the support of the senior management team and HR consultant, reviews and periodically updates our Modern Slavery Policy.

Policies and Procedures

Total Recruitment Solutions has developed and implemented several tools and policies to ensure that we are conducting business both ethically and transparently.

These include:

1. Employment Policy – We promote equality within our recruitment processes and actively promote equality of opportunity. We aim to treat all our employees in a fair and consistent manner, promoting good relationships and providing a healthy workplace.
2. Whistleblowing Policy – We encourage a culture of openness and expect and encourage employees to bring to our attention any illegal practices or wrongdoing which may threaten our employees, our business or the wider public.
3. Ethical Trading Policy – We passionately believe in ethical principles and good stewardship. We undertake all reasonable and practical steps to ensure that our standards are implemented throughout our supply chain and that all local legislations and regulations are complied with.

Other policies:

Anti-Bribery Policy

Serious Workforce Incident Procedure

Responsible Recruitment Policy

Recruiter Compliance Principles

Worker Questionnaire

Worker Interview Questions.

³ <https://www.stronger2gether.org/uk-recruitment/>

Modern slavery risks within our business.

We understand that due to the nature of our business we are perfectly positioned to contribute to the fight against Modern Slavery. All external business, suppliers and affiliates are expected to familiarise themselves with our Modern Slavery Statement and align themselves with our ethical stance on this matter. We hope that by spreading awareness throughout our business, from our clients to our candidates, that we can begin to manage the risk posed by Modern Slavery and Human Trafficking within the recruitment sector.

Suppliers

We conduct due diligence on our suppliers and will undertake all reasonable and practical steps to ensure:

- Regular Modern Slavery Risk Assessments are conducted within their own supply chain and that any instances of non-compliance will be assessed, and appropriate actions are taken.
- UK based suppliers pay their employees at least the national minimum wage.
- We reserve the right to terminate our business relationship with any supplier should any instances of modern slavery become known.

Candidates

- All our staff responsible for sourcing and placing candidates have received internal training and signed our Responsible Recruitment Principles which outline our ethical principles.
- There are several policies and procedures that have been incorporated into our recruitment processes. These have been designed to identify signs of Modern Slavery at the earliest opportunity.

Action Total Recruitment Solutions Ltd take to prevent and deal with identified risks of modern slavery within our business.

We have Stronger Together posters displayed in our head office to raise awareness of the signs and reality of Modern Slavery. All staff receive training that is appropriate to their role, and we have a dedicated Modern Slavery Champion who has undertaken training specifically related to modern slavery and human trafficking in the workplace.

How we manage risk through our good practice recruitment processes:

- We only pay into bank accounts in the name of the worker and random checks are conducted to minimise the risk of multiple uses of the same address. We also perform the same red flag checks on contact details, mobile phone numbers and email addresses.
- Each member of staff responsible for sourcing and placing candidates sign our Recruiter Compliance Principles document.

- Regular welfare checks are conducted where open and informal conversations are had between consultants and their temporary workers. All our recruitment consultants have been briefed in physical potential indicators of modern slavery.
- As part of our registration process, we have incorporated vital information to all workers, including material detailing help that is available to any potential victim of modern slavery and human trafficking. This includes details of our own whistleblowing contact details and grievance mechanism.
- Within our initial candidate screening we use Government software to complete all necessary right to work checks.
- As a business we endeavour to ascertain that person presenting for interview or work placement is the same as the person in the identity documents.
- When we conduct site inductions involving numeracy or literacy testing, we can make sure this is done in a controlled environment, preventing any manipulation.
- Total Recruitment Solutions Ltd can demonstrate that an increase in labour demands do not impact on the delivery of good practice during our recruitment process.
- Our charge rate is enough to cover all worker statutory wage factors, overheads, and our service charge.

Overview

Total Recruitment Solutions is committed to continually review this Modern Slavery statement and Policy and ensure that we are always acting in a socially responsible manner. In doing so we shall respect the economic, social, cultural, political, and civil rights of all our workers. We shall ensure transparency in our own business and in our approach to tackling unethical business practices throughout our supply chains and as outlined by the Modern Slavery Act 2015.

Signed by	Job role	Signature
Michael Perrin	Director	M D Perrin
Date 01.04.24		

Review date