



# Modern Slavery Policy

[Workforce Recruitment Group Ltd](#)

WFRG- 024

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## Foreword

As Chief Executive Officer of Workforce Recruitment Group Limited, I would like to endorse our Company belief that we aim to act in a way that is responsible and ethical at all times. We always strive to make a positive impact: for our clients, our candidates, and our employees, indeed for all the people who are touched by our organisation.

Workforce was established in 2006 and is now one of the UK's leading, specialist recruitment consultancies. We supply hard to find, highly skilled workers to the Manufacturing, Healthcare, Hospitality and Engineering sectors. Our unique business model allows us to source these sought-after candidates from throughout the UK and all over the World, offering them first class employment opportunities with many of the UK's best companies.

We have defined our Modern Slavery Policy as the use of ethical business practices with a strong ethos concerning the rights of the individual. We operate at all times in accordance with the legislation contained within the Modern Slavery Act 2015, and maintain a commitment to comparable ethics, which we believe align with our stated corporate vision and values.

## Our Vision

*“To be experts in all that we do, going the extra mile to deliver world class service to both our clients and our candidates.”*

## Our Corporate Values



### Integrity

Doing the right thing, even when nobody is watching.



### Passion

Taking pride in our business, and always going the extra mile.



### Vision

Maintaining commercial awareness, always looking to see how we can improve.



### Supportive

Working as a team, encouraging collaboration whilst sharing mutual success.



### Performance

Always delivering results in a fast-paced, high-performance culture.

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I believe that these values are directly relevant to the issues associated with eradicating the evil of modern slavery and Workforce remains totally committed to continually developing and improving its processes to combat modern slavery and human trafficking.

**Simon Hayton**  
**Chief Executive Officer**

## **Modern Slavery Policy**

### **Introduction**

Modern slavery is a fundamental violation of basic human rights and a crime. It takes various forms including slavery, servitude, forced or compulsory labour and human trafficking. These offences are closely related but legally distinct:

- Slavery is where ownership is exercised over a person.
- Servitude involves the obligation to provide services imposed by coercion.
- Forced or compulsory labour involves work or services exacted from any person under the menace of a penalty and for which the person has not offered himself or herself voluntarily.
- Human trafficking involves arranging or facilitating the travel of another with a view to exploiting them.

While recognising the important differences between these offences, for the remainder of this Policy the collective description of “modern slavery” is used to describe any or all of them.

In all cases, some of the most vulnerable people in society are stripped of their dignity and basic freedoms and forced to work for someone else’s gain or benefit. The most common forms of modern slavery are sexual exploitation, labour exploitation including child labour, and domestic servitude.

### **Purpose of this Policy**

This Policy expresses the Company’s commitment to the fight against modern slavery. The specific steps taken by the Company on an annual basis in the implementation of this Policy are recorded in the Company’s annual Slavery and Human Trafficking Statement, published in accordance with the requirements of the Modern Slavery Act 2015. For information only, we refer to the Ethical Code for Partners Policy which declares our support for both the ILO’s IPEC and the Forced Labour Convention, 1930 (No. 29).

### **Policy Commitments**

1. Developing and improving policies and operating company procedures relevant to Modern Slavery and Human Trafficking and ongoing continuous improvement.
2. Accept that job finding fees are a business cost and will not allow these to be paid by job applicants. The Company will not use any individual or organisation to source and supply candidates without confirming that candidates are not being charged a work finding fee.
3. Ensure that all staff responsible for directly recruiting candidates are trained to be aware of issues around third-party labour exploitation and signs to look for and have signed appropriate Modern Slavery Key Principles.

4. Ensure that labour sourcing, recruitment and candidate placement processes are under the control of trusted and competent staff members.
5. Adopt a proactive approach to reporting suspicions of hidden worker exploitation to the Gangmasters and Labour Abuse Authority, Modern Slavery Helpline and police.
6. Provide information on tackling "Hidden Labour Exploitation" to our candidates through Modern Slavery Policies and other related documents translated into candidate native language and explained in candidate native language.
7. Carry thorough checks throughout our candidate's journey, starting during initial screening and interview and during candidate employment by regular audits and checks such as retention calls, candidate questionnaires, welfare site visits and client audits.
8. Encourage candidates 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 candidates to report such exploitation which may be occurring within their communities.
10. Require labour providers and other organisations in the labour supply chain to adopt policies and procedures consistent with the above.

The Company will from time to time assess and review the risk that modern slavery may be occurring in any part of its own business and in any of its supply chain. In light of any such risk assessments it may from time to time seek specific and further reassurances from its contractors, suppliers and other business partners and seek to carry out or procure due diligence or specific audits either itself or through group companies or third parties to satisfy itself that modern slavery is not occurring.

Where possible we build long standing relationships with contractors, suppliers and other business partners and make clear our expectations of business behaviour. This helps to reduce the risk of modern slavery. The Company is committed to transparency in its approach to tackling modern slavery consistent with its disclosure obligations under section 54 of the Modern Slavery Act 2015.

### **Application of this policy**

All members of staff are expected to:

- Read, understand and, so far as reasonably possible, work with the Company to assist with the aims of this Policy; and
- Raise concerns at the earliest possible opportunity with their manager or in the manner set out in the Company's Employee Handbook about any suspicion that modern slavery might be occurring in any part of the Company's business or in any of the Company's supply chain.

The Company wishes to encourage openness and will support anyone who raises a genuine concern that modern slavery might be taking place in any part of the Company's business or in any of the Company's supply chain and any concerns or issues can be raised by contacting the Company using the following email address:

[visa.compliance@work-force.co.uk](mailto:visa.compliance@work-force.co.uk)

## Responsibility for this Policy

The Company's board of directors has overall responsibility for this Policy, including ensuring that it complies with legal and ethical obligations. All members of staff are responsible for following this Policy to the extent that it affects their day-to-day work and in particular in respect of the reporting requirements.

## Sanctions

This Policy is not designed to be contractual in respect of members of staff. Any breach of this Policy by any member of staff that is deemed by the Company to be wilful or negligent, including in respect of his or her responsibilities, shall be investigated. Any remedial action that ensues will be taken in accordance with the Company's disciplinary processes. If, after investigation and due process, a breach that is deemed by the Company of serious in nature, could lead to sanction, up to and including summary dismissal. In the event that the Company has a reasonable belief that modern slavery is occurring in the business or supply chain of any contractors, suppliers and other business partners, the Company:

Will expect the relevant contractor, supplier, or other business partner:

- To be fully cooperative and transparent and supply such information as the Company may reasonably request in relation to the issue.
- To put in place remedial action as soon as reasonably practical with a view to ensuring that such modern slavery ceases to occur and that the victims of that modern slavery are appropriately safeguarded.
- To monitor the effectiveness of the remedial action taken including the actions taken to safeguard the victim.
- To report to the Company at reasonable intervals on the effectiveness of that remedial action and safeguarding and any further steps taken to ensure that such modern slavery ceases to occur.

May, depending on the circumstances and the terms of the contract with the relevant contractor, supplier or other business partner, terminate or suspend the relationship or otherwise cease, reduce or minimise business contact with the relevant contractor, supplier or other business partner.

In the event that the Company has a reasonable belief that modern slavery is occurring in any part of its own business or its supply chain the Company will:

- As soon as reasonably practical and so far, as is reasonably possible, put in place or recommend remedial action with a view to ensuring that such modern slavery ceases to occur and that the victims of that modern slavery are appropriately safeguarded.
- Monitor the effectiveness of the remedial action taken.
- As appropriate, deal with the matter under its disciplinary procedures.

## Training

All existing members of our team have received training to assist them in being able to identify modern slavery and to understand the contents and purpose of this Policy and the Company's procedures relating to combating modern slavery. This training is a part of our induction programme and is refreshed yearly.

The Company expects its contractors, suppliers and other business partners to provide appropriate training to their members of staff and, if and when requested, evidence that they have done so.

## Our Objectives and Key Performance Indicators

We continually measure the success and performance of our company by tracking key performance indicators developed and applied in order to measure the effectiveness of our compliance with the Modern Slavery Act. Our objectives include:

- Compliance Team to visit every client at least once a year.



- To send out 500 candidate welfare surveys in a year and analyse responses to ensure continuous improvement.
- To communicate with every candidate by text message at least once a month.
- To carry out an internal compliance audit once a month.
- To ensure our Supplier Questionnaires are sent to Key Suppliers.
- To conduct Modern Slavery Audits with candidates on site.
- To respond to 98% payroll and welfare related queries within 48 hours.
- To carry out Health and Safety audits with our clients.

### **Amendments to this Policy**

This Policy expresses the will of the Company and its commitment to the issues addressed. This Policy may be amended by the Company at its discretion at any time.

This Policy will be reviewed by the Company's board of directors on a regular basis.