Modern Slavery Policy

Workforce Recruitment Group Ltd

WRG - June 2026

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Global talent experts

1. Foreword

As Chief Executive Officer of Workforce Recruitment Group Limited, I endorse our commitment to acting responsibly, ethically and with integrity in all our business dealings. We aim to make a positive impact on our clients, candidates, employees and everyone affected by our organisation.

Workforce was established in 2006 and is a specialist recruitment consultancy supplying skilled workers to sectors including Manufacturing, Healthcare, Hospitality and Engineering. Our recruitment activity may involve sourcing candidates throughout the UK and internationally. We recognise that complex recruitment and labour supply chains can create risks of exploitation, and we are committed to identifying, preventing and addressing those risks.

"Our vision is to be experts in all that we do, going the extra mile to deliver world-class service to both clients and candidates. Respect for individual rights, dignity and freedom is central to this policy."

Simon Hayton
Chief Executive Officer

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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2. Policy Statement & Purpose

Modern slavery is a crime and a fundamental violation of human rights. It includes slavery, servitude, forced or compulsory labour and human trafficking. It can occur in any sector or country and may be hidden behind apparently legitimate recruitment, employment, accommodation or supply arrangements.

WRG has a zero-tolerance approach to modern slavery and human trafficking. We will act ethically and with integrity, maintain proportionate systems and controls, and take reasonable steps to prevent, identify, report and remedy exploitation in our own operations and in our supply chains.

This policy sets out WRG's minimum standards, reporting routes, response process and remediation approach. It should be read alongside relevant WRG procedures and policies, including recruitment, compliance, safeguarding, data protection, whistleblowing, health and safety and supplier due-diligence arrangements.

WRG will comply with applicable law, including the Modern Slavery Act 2015. Any annual Slavery and Human Trafficking Statement required of WRG will be maintained and published in accordance with applicable legal requirements.

3. Scope

This policy applies to all people working for or with WRG, in any capacity, including directors, employees, temporary workers, candidates, contractors, consultants, labour providers, recruitment partners, suppliers, client contacts and other business partners. We expect our clients, suppliers and other partners to communicate these standards through their own operations and supply chains.

The policy applies throughout the recruitment and placement journey, including candidate sourcing, interviews, offers, right-to-work and immigration processes, onboarding, relocation support, accommodation introductions, employment and ongoing welfare contact.

4. Our Commitments

- Zero tolerance: we will not knowingly tolerate slavery, servitude, forced or compulsory labour, human trafficking, child exploitation or other forms of labour exploitation.
- No recruitment fees charged to candidates: job-finding and recruitment fees are a business cost. WRG will not knowingly use a sourcing partner that charges candidates fees for obtaining work. Concerns about deductions, debt, deposits or other charges linked to recruitment must be investigated.
- Fair and transparent recruitment: candidates should receive clear information about the role, employer, pay, working conditions and relevant deductions. No person should be misled, threatened or coerced into accepting or remaining in work.
- Responsible sourcing: recruitment and placement activity must be managed by competent, authorised staff. Labour providers and other partners will be subject to proportionate due diligence and checks.
- Candidate understanding and access: we will explain relevant rights and reporting routes in language the candidate understands where reasonably practicable, using translated information or interpretation where needed.
- Ongoing welfare: we will use appropriate screening, welfare contact, candidate questionnaires, retention calls, site visits, client audits and other checks to identify potential warning signs during employment.
- Open reporting and protection: we encourage employees and candidates to raise concerns in good faith. Retaliation, intimidation or detrimental treatment for raising a concern will not be tolerated.
- Continuous improvement: we will review risk assessments, incidents, audit findings, training and feedback and make improvements where required.

5. Recognising Indicators of Modern Slavery

No single indicator proves that modern slavery is taking place. Staff should take concerns seriously, consider the wider circumstances and escalate them rather than attempting to investigate independently. Possible indicators include:

- A person appears frightened, controlled, closely monitored or unable to speak freely, or another person insists on answering for them.
- A worker cannot freely leave work or accommodation, has their identity documents or phone withheld, or is threatened with violence, deportation or other consequences.
- A worker is required to repay recruitment, travel or accommodation debt, faces unexplained or excessive deductions, or is told they must pay to secure or keep a job.
- Wages are withheld, pay differs significantly from what was promised, hours are excessive, or a worker cannot access their own earnings.
- A person is forced to work, is threatened or punished for refusing work, or is unable to leave an arrangement freely.
- Accommodation or transport is controlled by an employer, recruiter or intermediary in a way that restricts freedom or creates dependency.
- There are inconsistencies in recruitment records, signs of document control or falsification, unexplained third-party involvement, or a supplier refuses reasonable due-diligence questions.
- A worker shows signs of injury, exhaustion, neglect, isolation or fear, or reports threats, coercion, abuse or unsafe living conditions.

6. Roles & Responsibilities

6.1. Board of Directors / Chief Executive Officer

The Board of Directors has overall accountability for this policy and for ensuring WRG's approach is appropriately resourced and reviewed. The Chief Executive Officer and/or Managing Director must be informed promptly of serious concerns, material risks, suspected exploitation involving WRG personnel or significant supply-chain issues, subject to the safety and confidentiality considerations in this policy.

6.2. Compliance Team — policy owner and first point of contact

The Compliance Team has day-to-day responsibility for implementing this policy, maintaining guidance and records, coordinating initial triage, ensuring appropriate escalation, monitoring corrective actions and reviewing the effectiveness of controls. The designated Compliance Team case handler will coordinate queries and concerns relating to modern slavery and will ensure that cases are not left unresolved. Concerns and policy queries should be sent to visa.compliance@work-force.co.uk. The Compliance Team should acknowledge and assess reports promptly, prioritise immediate safety risks, record actions and escalate cases in accordance with Section 8. If the concern involves the usual contact or a member of the Compliance Team, the report should be sent directly to the Chief Executive Officer/Managing Director or another Board Director.

6.3. HR and line managers

HR and line managers must ensure that staff understand this policy, complete required training, raise concerns promptly and cooperate with appropriate reviews. They must not promise absolute confidentiality, conduct unsafe investigations or confront a suspected exploiter were doing so could increase risk.

6.4. All staff and representatives

Everyone within scope must read and follow this policy, remain alert to indicators of exploitation, record and report concerns promptly, preserve relevant information and cooperate with authorised case handling. No one should attempt to rescue or interview a potential victim in a way that could expose them to further danger.

7. Raising a Concern or Query

Concerns may be raised by employees, candidates, clients, suppliers or other parties. A person does not need proof before reporting a reasonable concern.

1. Report the concern as soon as possible to the Compliance Team at visa.compliance@work-force.co.uk, or to a line manager/HR representative. Include what was seen, heard or disclosed, when and where it occurred, who may be at risk, and any immediate safety concerns. Do not delay a report to collect more evidence.
2. If the concern involves the Compliance Team, the usual case handler, a line manager or another person who would normally receive the report, escalate directly to the CEO/Managing Director or another Board Director.
3. If anyone is in immediate danger, call 999. For non-emergency police assistance, call 101. Do not use internal reporting as a substitute for emergency services.
4. In the UK, concerns can also be raised with the Modern Slavery & Exploitation Helpline on 08000 121 700. Where appropriate, reports may also be made to the Fair Work Agency (FWA, previously The Gangmasters and Labour Abuse Authority or GLAA) or other relevant authorities.
5. A person may report anonymously if they prefer, although this may limit the ability to seek clarification or provide updates.

WRG will handle reports sensitively, share information only with those who need it for safeguarding, assessment or legal reasons, and keep records securely in line with data protection requirements. Confidentiality will be respected as far as possible, but cannot be guaranteed where disclosure is necessary to protect someone from serious harm or to meet legal obligations.

WRG will not tolerate retaliation against anyone who raises a concern in good faith, assists with an investigation or refuses to participate in conduct that may involve exploitation. Retaliation should be reported immediately through the escalation routes above.

8. Response, escalation and case handling

The Compliance Team case handler is responsible for coordinating the response and ensuring that each concern is assessed, prioritised according to risk, assigned, escalated and tracked to an appropriate conclusion. The response-time standards below must be applied alongside the case-handling process that follows.

8.1. Response Times and Prioritisation

- All modern slavery concerns must be assessed and prioritised according to the level of risk, the urgency of the situation and the potential impact on the individual concerned. The following internal service standards apply to the acknowledgement, escalation and handling of reported concerns.

Priority	Examples	Expected Response
Critical	Immediate danger, threats, suspected trafficking or a person being held against their will.	Immediate action must be taken to protect the individual's safety. Emergency services must be contacted where necessary. The concern must be escalated to the appropriate senior manager without delay.
High	Credible allegations of exploitation, withheld wages, coercion, restrictions on freedom or recruitment-related debt.	Escalate to the appropriate senior manager without delay and begin a risk assessment as soon as possible. Appropriate safeguarding measures and external referrals must be considered.

Standard	General policy queries, requests for guidance or non-urgent concerns that do not indicate an immediate safeguarding risk.	Acknowledge within two working days and provide an appropriate response or progress update. If further investigation is required, the individual must be kept informed of progress where appropriate.

- These are internal WRG service standards, not statutory deadlines. Urgent safeguarding concerns must never be delayed while waiting for an acknowledgement deadline, further information or routine administrative processes. Where the level of risk is unclear, assess it promptly and escalate where necessary. Reassess the priority if new information indicates that the risk has increased.
- The call handler must then follow the steps below, documenting the assessment, decisions, actions, escalation and follow-up in the confidential case record.

8.2. *Immediate safety and safeguarding*

- Assess whether a person is in immediate danger, being controlled, threatened or prevented from leaving. If there is immediate danger, contact emergency services and take reasonable steps to avoid increasing the risk to the person.
- Speak to the person privately only if it is safe and appropriate. Use an interpreter where needed. Do not pressure them to disclose information, make promises that cannot be kept, alert a suspected exploiter or take action that could expose them to retaliation.
- Respect the person's wishes and obtain informed consent for referrals wherever possible. However, consent does not prevent WRG from taking necessary action where there is an immediate risk of serious harm, a safeguarding duty or a legal reporting obligation. Seek specialist advice where the correct course is unclear.

8.3. Record and assess

- Create a confidential case record containing the date received, source, factual information, risk assessment, actions taken, decisions, referrals, responsible case handler and review dates.
- Record facts and the person's own words where relevant; distinguish verified information from allegations or assumptions. Collect only information necessary for the case and store it securely with access restricted.
- Assess the seriousness, urgency, possible victims, suspected perpetrators, worksite and supply-chain links, and whether other workers may be at risk.

8.4. Escalation and ownership

- The Compliance Team case handler must escalate urgent or credible concerns to the CEO/Managing Director promptly. Serious incidents, multiple potential victims, suspected involvement by a WRG employee or director, retaliation, or a client/supplier failing to cooperate must be escalated without delay.
- Where a report concerns the CEO/Managing Director or a Board Director, it must be referred to another uninvolved Board Director or an appropriate external authority/adviser.
- The case handler must identify a named internal owner for each action, agree timescales, maintain a case-action log and follow up until actions are completed or a reasoned decision is documented.
- If a concern is not acknowledged or actioned promptly, the reporter should escalate it to the CEO/Managing Director or another Board Director. External reporting routes remain available at any time.

8.5. External referrals and workplace action

- Consider referral to police, the Modern Slavery & Exploitation Helpline, FWA, local safeguarding services, specialist support organisations or other relevant authorities, taking account of the person's safety, wishes and applicable legal obligations.
- Where the concern relates to a client, labour provider or supplier, assess whether and how to engage them without exposing the person to further harm. Do not notify a suspected perpetrator before a safety assessment.
- Take proportionate steps to protect other workers who may be at risk, including pausing recruitment or placements, restricting contact with an intermediary, arranging safe contact, or suspending relevant activity while the risk is assessed.

8.6. Investigation and review

- The Compliance Team will coordinate an impartial, proportionate review, using specialist external support where necessary. Staff must not conduct their own interviews or investigations unless authorised and appropriately trained.
- Preserve relevant records and evidence lawfully. Any investigation must respect privacy, confidentiality, non-discrimination and the safety of the affected person.
- Review the case after key actions and at closure to determine whether risks have been reduced, whether the person has access to support, and what changes are needed to prevent recurrence.

9. Remediation and support

Where modern slavery or a credible risk of exploitation is identified in WRG's operations or supply chain, WRG will seek a responsible, victim-centred response with the affected person, the relevant client or supplier where safe, and appropriately qualified support organisations or authorities. The priority is the person's safety, rights, dignity and longer-term wellbeing. WRG will not treat the removal of a supplier or termination of a placement as, by itself, sufficient remediation.

A written remediation and corrective action plan should be developed where appropriate. Depending on the circumstances, it may include:

- Identifying and safely contacting potential victims, without placing them at further risk.
- Obtaining advice from specialist modern slavery organisations, safeguarding services, legal advisers or relevant authorities.
- Agreeing the affected person's immediate safety and support needs, taking account of their wishes, language, accessibility and circumstances.
- Helping the person access appropriate support, including safe accommodation, medical care, counselling, interpretation, independent advice and support to understand their rights.
- Addressing recruitment-related debt, unlawful fees, wage withholding, unlawful deductions or other financial harm, including considering repayment or recovery of fees where appropriate and safe.
- Reviewing employment, accommodation and transport arrangements to ensure they do not restrict the person's freedom or create further dependency.
- Working with the client or supplier to stop the exploitative practice, protect other workers, identify root causes and introduce corrective controls.
- Setting out actions, owners, deadlines, evidence required and review dates; monitoring progress and recording the outcome.
- Keeping the affected person informed in a safe and appropriate way and seeking feedback on whether the remedy is effective.

- Considering whether the matter requires notification to authorities, contractual action, a wider audit, staff training or a review of other placements or suppliers.

Remediation must be tailored to the individual and should not be conditional on the person cooperating with an internal investigation. WRG will not knowingly take action that increases the risk of retaliation or leaves a person without safe alternatives. Any decision to end a placement or supplier relationship must consider the potential impact on affected workers and, where feasible and safe, be accompanied by steps to reduce harm.

The case handler must monitor agreed actions until completion, record evidence of effectiveness and escalate overdue or ineffective actions to the CEO/Managing Director. If a client or supplier refuses to cooperate, fails to take adequate action or presents an ongoing unacceptable risk, WRG may pause or stop recruitment, suspend or terminate the relationship, subject to legal advice and contractual obligations.

10. Due diligence and supply-chain management

- Assess modern slavery risks proportionately when onboarding and reviewing clients, labour providers, recruitment partners, suppliers and other relevant business partners.
- Use supplier questionnaires, contractual requirements, declarations, audits and other checks where appropriate to the level of risk.
- Require partners to prohibit forced, compulsory or trafficked labour, prohibit candidate-paid recruitment fees, cooperate with reasonable enquiries and take effective corrective action when concerns arise.
- Request evidence of relevant policies, training, recruitment practices, worker payment arrangements and subcontracting controls where justified by risk.
- Review higher-risk arrangements and investigate warning signs, including unexplained subcontracting, excessive recruitment charges, document retention, wage deductions or restrictions on workers' movement.
- Maintain transparent records of due diligence, identified risks, actions and outcomes, and review whether controls remain effective.

11. Communication, training and awareness

Modern slavery awareness forms part of induction for relevant staff and is refreshed at least annually. Training should help staff identify indicators, understand candidate-fee prohibitions, use reporting channels, respond safely to disclosures and understand the escalation and remediation process. Additional or targeted training will be provided where risk, incidents or audit findings indicate a need.

WRG will communicate this policy and its expectations to relevant clients, suppliers and business partners at the start of a relationship and as appropriate thereafter. Candidate-facing information should be accessible and, where reasonably practicable, explained in a language the candidate understands.

12. Monitoring, records and performance measures

The Compliance Team will monitor the operation of this policy and maintain appropriate, secure records of concerns, decisions, referrals, due diligence, training and remediation actions. Access to case records will be restricted to those who need the information to perform their role.

WRG's monitoring may include the following existing objectives and controls:

- Compliance Team visits to every client at least annually.
- Candidate welfare surveys, with responses analysed to identify risks and opportunities for improvement.

- Monthly contact with candidates by text message, alongside other appropriate welfare checks.
- Monthly internal compliance audits.
- Supplier questionnaires for key suppliers.
- Modern slavery audits with candidates on site where appropriate.
- Monitoring responses to payroll and welfare-related queries, including the existing objective to respond to 98% within 48 hours.
- Health and safety audits with clients.

These measures will be reviewed for relevance and effectiveness. A concern involving potential exploitation must be prioritised according to risk and must not wait for a routine query-response target or scheduled audit.

13. Breaches and consequences

A breach of this policy by a WRG employee may result in investigation and disciplinary action, up to and including dismissal for misconduct or gross misconduct, in accordance with applicable procedures. A person identified as a potential victim must be treated primarily as someone requiring safeguarding and support, not penalised for conduct that may have resulted from coercion or exploitation.

Where WRG reasonably believes that a contractor, supplier, client or other business partner is involved in modern slavery or fails to cooperate with appropriate remediation, WRG may require corrective action, increase monitoring, pause activity, suspend or terminate the relationship, or take other appropriate steps subject to the circumstances, legal advice and contractual obligations.

14. Review and approval

The Board of Directors will review this policy at least annually and following any significant incident, material legal or operational change, or audit finding that indicates the policy should be updated. The Compliance Team is responsible for proposing updates and communicating material changes to relevant staff.

Policy owner: Compliance Team
Contact for concerns and queries: visa.compliance@work-force.co.uk
Emergency: 999 where there is immediate danger
UK Modern Slavery & Exploitation Helpline: 08000 121 700