

# Modern Slavery Statement and Policy

## STATEMENT

The Modern Slavery Act 2015 requires large employers to be transparent about their efforts to eradicate slavery and human trafficking in their supply chain. The act makes provisions about slavery, servitude and forced or compulsory labour and about human trafficking, including provision for the protection of victims. In accordance with the act, this statement articulates our policies and practices around recognising and preventing human trafficking and slavery in the global supply chain.

This statement is published in accordance with section 54 of the Act and relates to the financial year January 2022 to December 2022. It was approved by the Board of Directors on 3rd January 2023.

## BUSINESS STRUCTURE AND SUPPLY CHAINS

Encore Personnel is a limited company operating in the recruitment sector and supply over 4500 'blue collar' workers to 600 clients every week. We employ 200 staff in 45 business units and on-site locations throughout the UK. Our workers are recruited from throughout the EU and employed in the UK. From time to time, when skill shortages are particularly acute, Encore might recruit directly from the EU whilst always advertising vacancies in the UK.

Encore Personnel is an independent business.

All of the hirers that we work with, and all of the work-seekers we provide, are known to and identified by our staff. All of the temporary workers we supply are identified by our staff.

## **POLICIES AND PROCEDURES**

Encore Personnel has a modern slavery policy. In addition, Encore Personnel has the following policies which incorporate ethical standards for our staff.

- Ethical Trading Initiative
- Anti-Bribery Policy
- Whistleblowing Policy
- Corporate Social Responsibility Policy

Encore Personnel's policies are established by our senior leadership team, based on advice from HR professionals, industry best practice and legal advice, and in consultation with our directors and compliance team. We review our policies on a regular basis, or as needed to adapt to changes.

## **GANGMASTER'S LICENCING**

We are licensed labour providers under the provisions of the Gangmaster Licencing Act 2004 and accordingly adhere to the main standards.

The standards are all legal requirements to protect workers from poor treatment and exploitation. They cover issues such as working hours, training, terms and conditions, the national minimum wage and transport to ensure labour providers meet the basic safety and welfare standards.

(<http://www.legislation.gov.uk/ukpga/2004/11/introduction>)

There are eight standards covering the following subject areas:

- Fit and proper test
- Pay and tax matters
- Prevention of forced labour and mistreatment of workers
- Accommodation
- Working conditions
- Health and safety
- Recruiting workers and contractual arrangements

- Sub-contracting and using other labour providers

As such we adhere to these eight standards which collectively address our commitment to human rights and the elimination of all forms of forced and compulsory labour.

## **SEDEX**

Sedex is a not-for-profit membership organisation dedicated to driving improvements in ethical and responsible business practices in global supply chains. – (See more at: <http://www.sedexglobal.com/about-sedex/#sthash.0pJBBoRq.dpuf>)

Sedex has two main aims:

- To ease the burden on suppliers facing multiple audits, questionnaires and certifications
- To drive improvements in the ethical performance of global supply chains

Sedex does not mean that we have met any ethical standards, but it does mean that we have committed to continuous improvement.

## **RECRUITMENT AND EMPLOYMENT CONFEDERATION**

Encore Personnel are members of the Recruitment and Employment Confederation (REC). The REC Code of Professional Practice has been created to ensure that all members of the REC conduct their business ethically, to the highest standards and promote good practice. It is binding on all corporate members.

Encore Personnel adheres to the REC Code, which requires basic statutory compliance as well as higher ethical standards in 10 principles.

- Respect for laws
- Respect for honesty and transparency
- Respect for work relationships
- Respect for diversity

- Respect for safety
- Respect for professional knowledge
- Respect for certainty of engagement
- Respect for prompt and accurate payment
- Respect for ethical international recruitment
- Respect for confidentiality and privacy

## **PROCESSES TO ASSESS AND MANAGE RISKS**

By adopting the guidance of the Stronger Together organisation all of our recruiters observe (and monitor sub-contractor's activity) the following practices to assess and manage risks:

- Only interview applications in an approved location
- Not allow applicants to complete registration documents on behalf of others
- Not accept money, favours or any gifts at all from applicants or workers
- Not loan any personal money to temporary workers
- Notify a manager when informed by an applicant or worker that they have paid money to be introduced to the Company
- Not allow an unauthorised agent or individual to introduce job applicants to the Company.
- Notify a manager when suspecting an individual of introducing job applicants to the Company for personal gain
- Not act as landlords or be involved in the provision of accommodation, transport or other paid services to workers
- Not allow anyone other than an authorised person to choose which workers are selected for work shifts
- Not force or coerce temporary workers to work against their will
- Not threaten or subject workers to physical or mental mistreatment
- Treat applicants and workers with dignity and respect
- Raise any knowledge or suspicions of illegal or dubious activities regarding agents, temporary workers or colleagues to a manager immediately

## **PERFORMANCE INDICATORS**

Our Central Service function uses the following indicators to measure the effectiveness in ensuring that slavery and human trafficking is not taking place in the business or our supply chains:

- Checking addresses shows high occupancy of particular houses of agency workers
- Checking bank accounts shows a number of unrelated workers paid into one account
- Checking mobile phone numbers shows a number of unrelated workers contactable through one number
- Check documents for same next of kin and/or same place of origin/location in home country

## **TRAINING**

We adhere to standards of responsible conduct and train employees to treat each other with respect, and to adhere to laws, regulations and standards. Training, referencing practices detailed above, is undertaken:

- Within one month of a new consultant starting at Encore at their induction
- Refresher training annually in Modern Slavery and Worker Exploitation
- Then again in a more detailed version at developmental training at the Managers Training Academy (MTA)

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Peter Taylor

Managing Director

Encore Personnel Services Limited

## **POLICY**

## Encore Personnel Modern Slavery Policy January 2023

1. Encore Personnel is committed to eliminating modern slavery, human trafficking, forced labour, and similar human rights abuses.
2. Encore Personnel is committed to ensuring that its staff and any workers it supplies (directly or indirectly) are not subject to behaviour or threats that may amount to modern slavery, human trafficking, forced labour, and similar human rights abuses.
3. Encore Personnel provides appropriate training and awareness information for all of its staff. In particular:
  - Our Compliance and Leadership team receive detailed training in identifying and resolving concerns around modern slavery and human trafficking.
  - Our recruiters, HR personnel and staff involved in our recruitment and supply chains undertake training courses that include guidance around modern slavery and human trafficking, as well as other wider human rights issues.
  - All of our staff receive awareness-raising information around issues involving modern slavery and human trafficking, so that they can bring any concerns they have to the attention of our Compliance Team.
4. Any staff, workers or other parties are strongly encouraged to report any concerns or suspicions that they might have to our Compliance Team.
5. Reports surrounding these issues are taken extremely seriously by our board of directors who are committed to ensuring that all investigations shall be prompt and effective. If our investigations reveal any issues, we are committed to taking appropriate action, including but not limited to:
  - Working with the appropriate organisations to improve standards,
  - Removing that organisation from our supplier list,
  - Passing details to appropriate law enforcement bodies.

6. We regularly monitor our risks in this area through the use of relevant key performance indicators, including:
  - Regular audits, re-audits, spot checks, and related due diligence, and
  - Regular modern slavery training and awareness amongst our staff.
7. As part of our efforts in this area, we publish a modern slavery statement on an annual basis.
  
8. We would also recommend reading this in conjunction with our other policies, including our:
  - Corporate social responsibility policy,
  - Ethical Trading Initiative,
  - Anti-bribery policy, and
  - Whistle-blowing policy.

This policy was adopted on 3rd January 2023 after being agreed by our board of directors. It is reviewed annually.