

# MODERN SLAVERY POLICY STATEMENT 2019

## INTRODUCTION TO MODERN SLAVERY

Modern slavery can take many forms, including the trafficking of people, forced labour, servitude and slavery. Any consent victims have given to their treatment will be irrelevant where they have been coerced, deceived or provided with payment or benefit to achieve that consent.

This statement is made as part of gap personnel's commitment to eliminating the exploitation of people under the Modern Slavery Act 2015. It summarises how gap personnel operates, the policies and processes in place to minimise the possibility of any problems, any risks we have identified, how we monitor them, and how we train our staff.

## MODERN SLAVERY STATISTICS



## OUR BUSINESS

Founded in 1997, we are one of the top 10 industrial recruitment agencies in the UK, supplying temporary, contract and permanent staff to companies across a broad range of sectors.

We offer nationwide coverage across seven major regions through high-street branches, specialist divisions and onsite managed solutions. With a turnover of £200 million in 2018, we currently payroll in excess of 12,000 temporary workers each week and cover more than 3.5 million shifts per year.

Our parent company, Trust Tech Inc, is a global human resources and staffing provider with revenues in excess of £500 million. Following the acquisition of gap personnel group, Trust Tech have provided significant investment to enhance the systems, processes, and products offered to our clients and to ensure we continue to grow as a market leading recruitment partner, both in the UK, and across Europe.

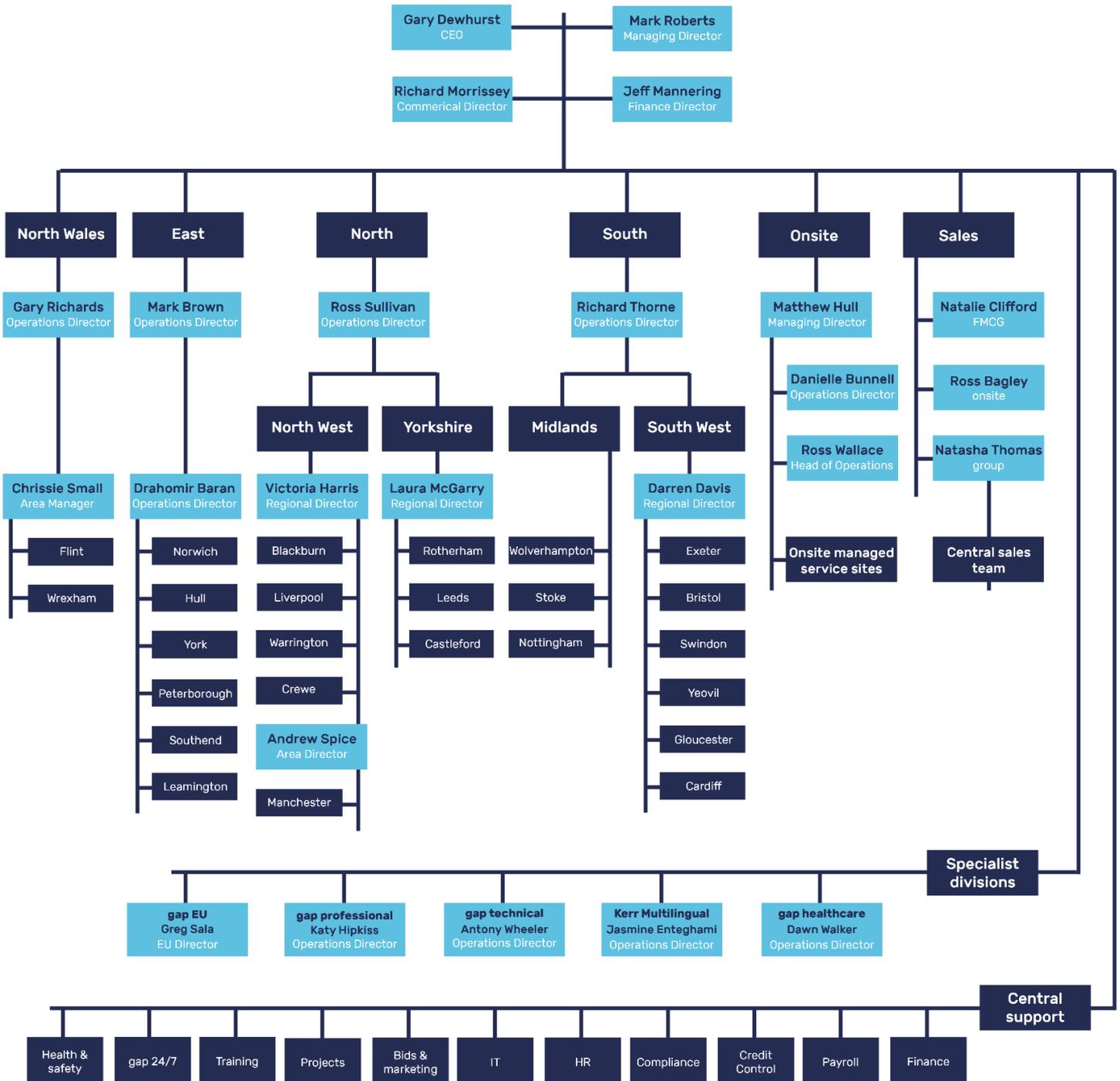
The sectors believed to be most affected by slavery and human trafficking are construction, agriculture, textile, security, and food processing and packaging, constituting much of gap personnel's core business. As a leading recruiter in the UK operating within these key sectors, gap personnel realise that we are in at the front line of the recruitment process and our position is key to raising awareness of modern slavery and tackling the problem of hidden labour exploitation. gap personnel are committed to developing and adopting a proactive approach to tackling hidden labour exploitation.

Our clients range from market-leading multinationals through to SMEs and start-ups. All our clients, work seekers, and temporary workers, are known to, and identified by our staff during the client on boarding and candidate registration process as applicable.

At the time this statement was prepared, gap personnel's annual turnover is in excess of £200 Million.

This policy is applicable to all offices and operations within the gap personnel group (Including gap technical, Kerr Recruitment, gap professional, Quattro Recruitment, Quattro Healthcare, Quattro Executive, gap personnel Europe).

## COMPANY STRUCTURE



## MEMBERSHIPS, ASSOCIATIONS AND CREDENTIALS

In recognition of the responsibility of gap personnel to our clients, candidates, employees and contractors, it is a fundamental value of gap personnel that all of its business and other practices be conducted at all times in compliance with all applicable laws and regulations of the countries in which it operates, its officiating bodies and associations. This is demonstrated through our long-standing relationships with the following organisations:

- The Recruitment and Employment Confederation
- The Association of Labour Providers
- The Association of Recruitment Consultancies
- GLAA licence holder
- Business Partner of Stronger Together
- 2018 Recruiter Award Winner for Most Effective Compliance Operation

## OUR POLICIES

gap personnel have the following policies which incorporate ethical standards for our staff, clients and our suppliers:

- [Ethical Trading Policy](#)
- [Anti Bribery and Corruption Policy](#)
- [Whistleblowing Policy](#)
- [Criminal Finance Act Policy](#)

gap personnel's policies are established by our Compliance Team, HR Department, Directors and Senior Leadership Team. Based on advice from HR professionals, industry best practice, legal partners, and in consultation with REC, ALP and Stronger Together. We review our policies annually or as needed to adapt to changes.

## MANAGING RISK

We understand that conducting thorough practices and applying due diligence in advance of any engagements we enter into, whether they be with clients, applicants or third-party suppliers, is critical to managing the risk of modern slavery and hidden labour exploitation occurring within our business and/or our supply chains.

All external business partners, affiliations and suppliers of gap personnel are expected to familiarise themselves with our Modern Slavery Statement and associated policies and commitments, and operate themselves in a manner which supports our methodology and vision of eliminating the exploitation of people under the Modern Slavery Act 2015 and ensuring this does not occur within our supply chain.

## DUE DILIGENCE – SUPPLIERS

Irrelevant of our suppliers own policy or process in relation to modern slavery, the following due diligence is conducted by gap personnel with all suppliers whether they be suppliers of goods and services or 2<sup>nd</sup> Tier suppliers of labour provision.

[Due Diligence - Suppliers](#)

## DUE DILIGENCE – APPLICANTS

As a front-line Recruitment Agency, we acknowledge that we are in an ideal position to not only increase applicants' awareness and understanding of modern slavery, but to ensure through detailed practices that we can identify early on within our recruitment process any potential victims, and reduce the exposure of our business to instances of modern slavery. The below link details the measures and procedures in place within our recruitment process.

[Due Diligence - Applicant Onboarding Process](#)

## DUE DILIGENCE - WORKERS

The safety and welfare of our workers is paramount to our business principles, as such, the below processes and practices have been designed, developed and implemented with the intention of ensuring our workers' safety and welfare following placement with gap personnel and our clients. The below link details the measures and processes in place to effectively manage and monitor the exposure of our workers once placed.

[Due Diligence - Worker Onboarding Process](#)

## TRAINING

In line with our commitment to identifying any potential signs of modern slavery, forced labour or human trafficking, and ultimately preventing labour exploitation from occurring within our operation, we have sourced, developed and undertake the following training programmes:

### Internal training

- All new starters attend a 4 day corporate induction which includes a dedicated session on Stronger Together, GLAA and Modern Slavery and how the key principles are to be applied within our operation;
- In addition to attending the induction, all new starters undertake a series of E-Learning training sessions within their first 4 weeks of joining the business. Included in these is a CPD accredited Modern Slavery training course;
- Upon completing the corporate induction, all new starters are asked to commit to preventing labour exploitation by signing and agreeing to the 'Recruiter Compliance Principles' document provided by Stronger Together;
- All existing staff undertake annual refreshers of the Modern Slavery E-learning course;
- All internal training courses are informally refreshed and updated as required to ensure the content remains current.

The aims of internal training are to:

- Ensure that all staff responsible for directly recruiting workers are aware of issues around third-party labour exploitation and signs to look for to help spot potential cases;
- Ensure that labour sourcing, recruitment and worker placement processes are under the control of trusted and competent staff members;
- Adopt a proactive approach to reporting suspicions of worker exploitation to the GLAA and the police.

#### External training

- Our Compliance Team members that specialise in Social and Ethical Compliance have attended “Tackling Modern Slavery in Global Supply Chains” and “Tackling Modern Slavery in UK Businesses” hosted by Stronger Together;
- Regular attendance to ALP and Stronger Together Roadshows and/or webinars;
- External training is sourced and attended as required based on individual staff needs.

The aims of the external training are to:

- Ensure that our internal Compliance Team are up to date with current industry guidance and best practice processes so that they may effectively support our operational teams with situations that may arise;
- To identify new methods and processes that can be implemented into our business, ensuring a proactive approach to tackling modern slavery within our organisation and that of our supply chain.

#### 2018 PERFORMANCE AGAINST MODERN SLAVERY OBJECTIVES

As a result of our concerted efforts, training and strengthened processes at registration and interview stages of our recruitment process, throughout 2018, gap personnel teams have identified and reported multiple cases suspected to relate to slavery, human trafficking and forced labour.



#### 2017 PERFORMANCE AGAINST MODERN SLAVERY OBJECTIVES

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## RESPONSIBILITY

Local representatives have been appointed in the form of our Branch and Onsite Managers. Our managers are trained and tasked with the responsibility of upholding the aims of our Modern Slavery Statement, associated policies and commitments as an approved Business Partner of Stronger Together at a local level, thus enabling the early identification of potential victims of modern slavery.

Responsibility to ensure the policy commitments are upheld, including training, updates and auditing, lies with gap personnel's internal Compliance Team, with overall responsibility lying with Mark Roberts, gap personnel's Managing Director.

## OVERVIEW

As a responsible corporate business, gap personnel aim to act in a socially responsible manner at all times, by respecting the economic, social, cultural, political and civil rights of those employed through our business, and by complying with human rights legislation and the Modern Slavery Act 2015.

Since the publication of our previous Modern Slavery statements, the gap personnel internal Compliance Team have made several changes to their training, systems, audits and standard business practices which have strengthened our operational understanding, awareness and process relating to modern slavery. Additionally, they have developed links with various external bodies and government authorities to ensure industry issues including illegal working prevention and labour exploitation are effectively managed and escalated where required.

We are proud upon publication of our 2019 statement to be able to demonstrate the effectiveness of the processes we have introduced into our business in relation to tackling modern slavery, human trafficking and forced labour exploitation. The successful identification of several cases of potential exploitation reinforces the dedication and commitment of our teams to tackling modern slavery.

As a business, we are committed to continuous improvement and strive to identify new methods, processes and practices that can be incorporated into our business operations, ensuring the health, safety and welfare of our workforce.



**Mark Roberts**  
**Managing Director**  
**18/04/2019**

## HOW TO CONTACT US

You can contact gap personnel Head Office via the following methods:

Post: gap personnel, gap personnel House, Chesney Court, Wrexham Technology Park, Wrexham, LL13 7YP

Tel: 01978 294 201

Email: [feedback@gap-personnel.com](mailto:feedback@gap-personnel.com)