



Modern Slavery & Human Trafficking Statement

www.paritasrecruitment.com

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Introduction

Paritas Recruitment recognises that all businesses have an obligation to prevent slavery and human trafficking and will do all in its power to prevent slavery and human trafficking within its business and within the supply chains through which it operates.

Modern slavery is a crime resulting in an abhorrent abuse of human rights. It is constituted in the Modern Slavery Act 2015 by the offences of 'slavery, servitude and forced or compulsory labour' and 'human trafficking'. A full definition of modern slavery is included at Appendix A.

Modern slavery can take many forms including the trafficking of people, forced labour, servitude and slavery. As the world's leading recruitment experts, we take our responsibility for supplying staff extremely seriously and are aware of the potential for being targeted by traffickers and unlicensed gangmasters. Our own processes around candidate engagement ensure our employees are alert to the signs of exploitation, in order that we may take the necessary action promptly and effectively should it be identified.

This statement focuses specifically on *Paritas Recruitment's* compliance with the Modern Slavery Act 2015 (the Act) and highlights the steps we take to ensure there is no slavery or human trafficking occurring within the organisation or its supply chains. One of our Company's most valuable assets has always been its reputation for integrity and fairness. Maintaining this reputation within our market is an essential pre-requisite to our continued success.

Our Business

Our business consists of recruitment across the following specialisms:

- Audit
- Compliance
- Data
- Risk

Our Supply Chains

Our supply chains include, but are not limited to, sourcing candidates for clients. This may involve the introduction by external agencies to *Paritas Recruitment* of candidates for onward supply to our clients. We expect our suppliers and potential suppliers to aim for high ethical standards and to operate in an ethical, legally-compliant and professional manner. We also expect our suppliers to promote similar standards in their own supply chain.

Our Policies including on Slavery and Human Trafficking

Suppliers are expected to have in place a policy recognising, respecting and protecting the human rights of their employees, those of their suppliers and business partners and the communities affected by the suppliers' operations.

Employees should be free to choose to work for their employer and to leave the company upon reasonable notice. All employees must be provided with a clear contract of employment, which complies with local legislation. All employees must be treated in a fair and equal manner and with dignity and respect.

Any form of discrimination, victimisation or harassment on the grounds of marital or civil partnership status, sex (including gender reassignment), race (including colour, ethnic and national origin, nationality), disability, sexual orientation, having or not having dependants, religious belief or political opinion, age, trade union activity and offending background should be prohibited.

All applicable laws and industry standards on employee wages, benefits, working hours and minimum age should be adhered to in all countries of operation, without any unauthorised deductions. Suppliers should observe the provisions of the International Labour Organization such that any young persons under the age of 18 should not be employed to work at night or for any hazardous work and their employment should not harm the young person's education, health or physical, mental, moral or social development. No young persons may be employed below the age of 16.

All slavery and human trafficking laws must be complied with including, but not limited to, the UK Modern Slavery Act 2015. Suppliers must ensure their business operations are free from slavery and human trafficking practices whether in the UK or elsewhere, both internally and within their supply chains and other external business relationships. We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

Steps Taken by *Paritas Recruitment*

Management Responsibility And General Awareness

We have:

- Reported progress to our Senior Management.
- Reconfirmed management responsibility for this policy and statement.
- Published this statement and the Modern Slavery Act in our website.

Risk assessment

We have:

- Completed a review of this policy and statement against our activities to establish whether the approach we have taken follows emerging best practice by:
 - Assessing and interpreting any recent or emerging case law and best practice;
 - Benchmarking our activities against statements and action plans undertaken by similar public and private organisations.
- Re-evaluating the risk of non-compliance as part of our Risk assessment.

Additional risk mitigation

We have:

- Introduced new processes and procedures in relation to procurement and due diligence.
- Confirmed the applicability and enforceability of clauses and conditions included in our legal agreements and contracts.

Due Diligence Process for Slavery and Human Trafficking

Paritas Recruitment ensure strict compliance checks are carried for all candidates it supplies. We verify the identity of each worker and their right to work before supply commences.

As part of our commitment to identify and eradicate slavery and human trafficking, we have in place a process to undertake due diligence on our supply chain network to ensure compliance with legislative obligations; such compliance forms part of our contractual relationship with suppliers.

All *Paritas Recruitment* employees have access to dedicated channels through which they may voice concerns, either through local reporting mechanisms or through the whistleblowing procedure. *Paritas Recruitment* is committed to protecting employees when disclosing malpractice and will ensure that all disclosures made in good faith will be treated confidentially and without fear of retaliation.

Training

All staff within *Paritas Recruitment* are expected to comply with all laws and act in accordance with local guidelines and regulations and act with integrity and honesty. We have undertaken to review our policies and procedures to ensure our colleagues have access to any additional

information and support they may require with regard to human trafficking, forced labour, servitude and slavery.

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and constitutes *Paritas Recruitment's* slavery and human trafficking statement.

Responding to an incident of modern slavery

Modern slavery is extremely prevalent across the globe. The International Labour Organization (ILO) estimates that there are 21 million people in forced labour in the world today. It is important that businesses do not deny or try to ignore the problem. The Modern Slavery Act provisions are designed to encourage businesses to tackle slavery head on.

If a specific case of modern slavery is identified here in the UK, it should be reported to the police immediately on 101. If potential victims are in immediate danger the standard 999 emergency number should be used.

In the UK, mechanisms are in place to assist victims of slavery and human trafficking. If you identify a potential victim they can be referred to the National Referral Mechanism to be formally identified as a victim of modern slavery and offered Government-funded support. Referral for potential adult victims is by consent. Government-funded support is provided through a range of specialist providers across the UK. A list of the relevant organisations is provided at Appendix B.

When training employees in the UK to identify the signs of modern slavery and to flag up potential issues, you should inform them about the Modern Slavery Helpline on 0800 0121 700. This will allow anyone who thinks they may have come across an instance of modern slavery, or indeed who may be a victim themselves, to call for more information and guidance on what to do next.



Leigh Albrecht
Director



Paul Sefton
Director



Dan Drake
Director

Appendix A

Modern Slavery Definition

Modern Slavery is a term used to encapsulate both offences in the Modern Slavery Act: slavery, servitude and forced or compulsory labour; and human trafficking. The offences are set out in section 1 and section 2 of the Act, which can be found at:

<http://www.legislation.gov.uk/ukpga/2015/30/section/1/enacted>

<http://www.legislation.gov.uk/ukpga/2015/30/section/2/enacted>

Definition of Slavery and Servitude

Slavery, in accordance with the 1926 Slavery Convention, is the status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised. Since legal 'ownership' of a person is not possible, the key element of slavery is the behaviour on the part of the offender as if he/ she did own the person, which deprives the victim of their freedom.

Servitude is the obligation to provide services that is imposed by the use of coercion and includes the obligation for a 'serf' to live on another person's property and the impossibility of changing his or her condition.

Definition of Forced or Compulsory Labour

Forced or compulsory labour is defined in international law by the ILO's Forced Labour Convention 29 and Protocol. It involves coercion, either direct threats of violence or more subtle forms of compulsion. The key elements are that work or service is exacted from any person under the menace of any penalty and for which the person has not offered him/her self voluntarily.

Definition of Human Trafficking

An offence of human trafficking requires that a person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult. In addition, the exploitation of the potential victim does not need to have taken place for the offence to be committed. It means that the arranging or facilitating of the movement of the individual was with a view to exploiting them for sexual exploitation or non-sexual exploitation. The meaning of exploitation is set out here: <http://www.legislation.gov.uk/ukpga/2015/30/section/3/enacted>.

Definition of Child Labour

Child labour is defined by international standards as children below 12 years working in any economic activities, those aged 12 - 14 engaged in more than light work, and all children engaged in the worst forms of child labour (ILO).

The term "child labour" is often defined as work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. Whether or not particular forms of "work" can be called "child labour" depends on the child's age, the type and hours of work performed, the conditions under which it is performed and the objectives pursued by individual countries.

Children can be particularly vulnerable to exploitation, but child labour will not always constitute modern slavery. It will still be necessary to determine whether, based on the facts of the case, the children in question are being exploited in such a way as to constitute slavery, servitude and

forced or compulsory labour or human trafficking. For example, it is possible for children to undertake some 'light work' which would not necessarily constitute modern slavery. 'Light work' is defined by article 7 of ILO Convention No. 138.

Children do have particular vulnerabilities which should be considered when determining whether modern slavery is taking place. The Modern Slavery Act 2015 specifically recognises that it is not necessary for a child to have been forced, threatened or deceived into their situation for it to be defined as exploitation.

The Worst Forms of Child Labour

The worst forms of child labour are very likely to constitute modern slavery.

The worst forms of child labour are defined by article 3 of ILO Convention No. 182 as:

- a) all forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom and forced or compulsory labour, including forced or compulsory recruitment of children for use in armed conflict;
- b) the use, procuring or offering of a child for prostitution, for the production of pornography or for pornographic performances;
- c) the use, procuring or offering of a child for illicit activities, in particular for the production and trafficking of drugs as defined in the relevant international treaties;
- d) work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children.

Behaviour constituting modern slavery

Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in many different ways. There is a spectrum of abuse and it is not always clear at what point, for example, poor working practices and lack of health and safety awareness seep into instances of human trafficking, slavery or forced labour in a work environment. However, businesses have a responsibility to ensure that workers are not being exploited, that they are safe and that relevant employment (include wage and work hour), health and safety and human rights laws and international standards are adhered to, including freedom of movement and communications.

There will be cases of exploitation that, whilst being poor labour conditions, nevertheless do not meet the threshold for modern slavery – for example, someone may choose to work for less than the national minimum wage, or in undesirable or unsafe conditions, perhaps for long work hours, without being forced or deceived. Such practices may not amount to modern slavery if the employee can leave freely and easily without threat to themselves or their family. Organisations do still nevertheless have a legal duty to drive out poor labour practices in their business, and a moral duty to influence and incentivise continuous improvements in supply chains.

Appendix B

UK Modern Slavery Adult Victim support providers

England and Wales

- The Salvation Army 0300 303 8151

Scotland

- Trafficking Awareness Raising Alliance (TARA) 0141 276 7724
- Migrant Helpline 07837 937737 or 07789 791 110

Northern Ireland

- Migrant Help 013 0420 3977 or 07766 668 781 (for male potential victims of human trafficking)
- Women's Aid 028 9024 9041 (for female potential victims of human trafficking)

Modern Slavery Helpline

- The NGO Unseen operates a UK-wide 24/7 Modern Slavery Helpline that victims, employers and members of the public who may encounter modern slavery can call for expert support and advice on 08000 121 700.

Appendix C

Useful Information and Resources

UK Government Modern Slavery Webpage: www.gov.uk/government/collections/modern-slavery

Modern Slavery Act 2015: www.legislation.gov.uk/ukpga/2015/30/contents/enacted

The Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015:

www.legislation.gov.uk/ukdsi/2015/9780111138847

Transparency in Supply Chains Consultation Document and Government Response:

www.gov.uk/government/consultations/modern-slavery-and-supply-chains

Anti-Slavery Commissioner: www.antislaverycommissioner.co.uk/

Alliance 8.7: www.alliance87.org/

International Guidelines and Conventions

UN Guiding Principles on Business and Human Rights (UNGPs):

www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf

UN Guiding Principles Reporting Framework: www.ungpreporting.org/

Good Business: Implementing the UN Guiding Principles on Business and Human Rights (September 2013) and update (May 2016): www.gov.uk/government/publications/bhr-action-plan

Shift, Mapping the Provisions of the Modern Slavery Act against the Expectations of the UN Guiding Principles on Business and Human Rights:

www.shiftproject.org/resources/publications/mapping-modern-slavery-act-un-guiding-principles/

OECD, Guidelines for Multinational Enterprises: <http://mneguidelines.oecd.org/guidelines/>

UN Global Compact: www.unglobalcompact.org/

ILO Resources on Forced Labour, Human Trafficking and Slavery:

www.ilo.org/global/topics/forced-labour/lang--en/index.htm

ILO Resources on Child Labour: www.ilo.org/global/topics/child-labour/lang--en/index.htm

The United Nations Convention on the Rights of the Child (UNCRC):

www.ohchr.org/en/professionalinterest/pages/crc.aspx

UNICEF, The UN Global Compact and Save the Children, Children's Rights and Business Principles: www.unicef.org/csr/12.htm

Tools, Guidance and Resources

Walk Free Global Slavery Index: www.globalsslaveryindex.org/

U.S. Department of Labor: List of Goods Produced by Child Labor or Forced Labor:

www.dol.gov/ilab/reports/child-labor/list-of-goods/

CORE Coalition, Practical Guides:

<http://corporate-responsibility.org/publications/practical-guides/>

ETI Base Code Guidance: Modern Slavery

www.ethicaltrade.org/resources/base-code-guidance-modern-slavery

ETI Base Code Guidance: Child Labour

www.ethicaltrade.org/resources/base-code-guidance-child-labour

ETI Human Rights Due Diligence Framework

www.ethicaltrade.org/resources/human-rights-due-diligence-framework

Verité eLearning on Supply Chain Accountability: www.verite.org/research/elearning

Labour Exploitation Accountability Hub: <http://accountabilityhub.org/>

ETI and Hult International Business School, Corporate Leadership on Modern Slavery

www.ashridge.org.uk/faculty-research/research/current-research/research-projects/corporateleadership-on-modern-slavery/

Stronger Together: <http://stronger2gether.org/>