

MODERN SLAVERY POLICY STATEMENT 2021

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



40.3 million
individuals enslaved
globally



24.9 million
victims of forced
labour



Tens of thousands
of modern slavery
victims in the UK
today



70% of slavery
victims are women
and girls

Our business

gap personnel group was founded in 1998, and we are now one of the top five largest industrial providers in the UK, supplying temporary, contract and permanent workers to companies across the industrial sectors. We offer nationwide coverage through high-street branches, specialist divisions and onsite managed solutions. With a turnover of almost £200 million in 2019, we currently payroll in excess of 12,000 temporary workers each week and cover more than 3 million shifts per year.

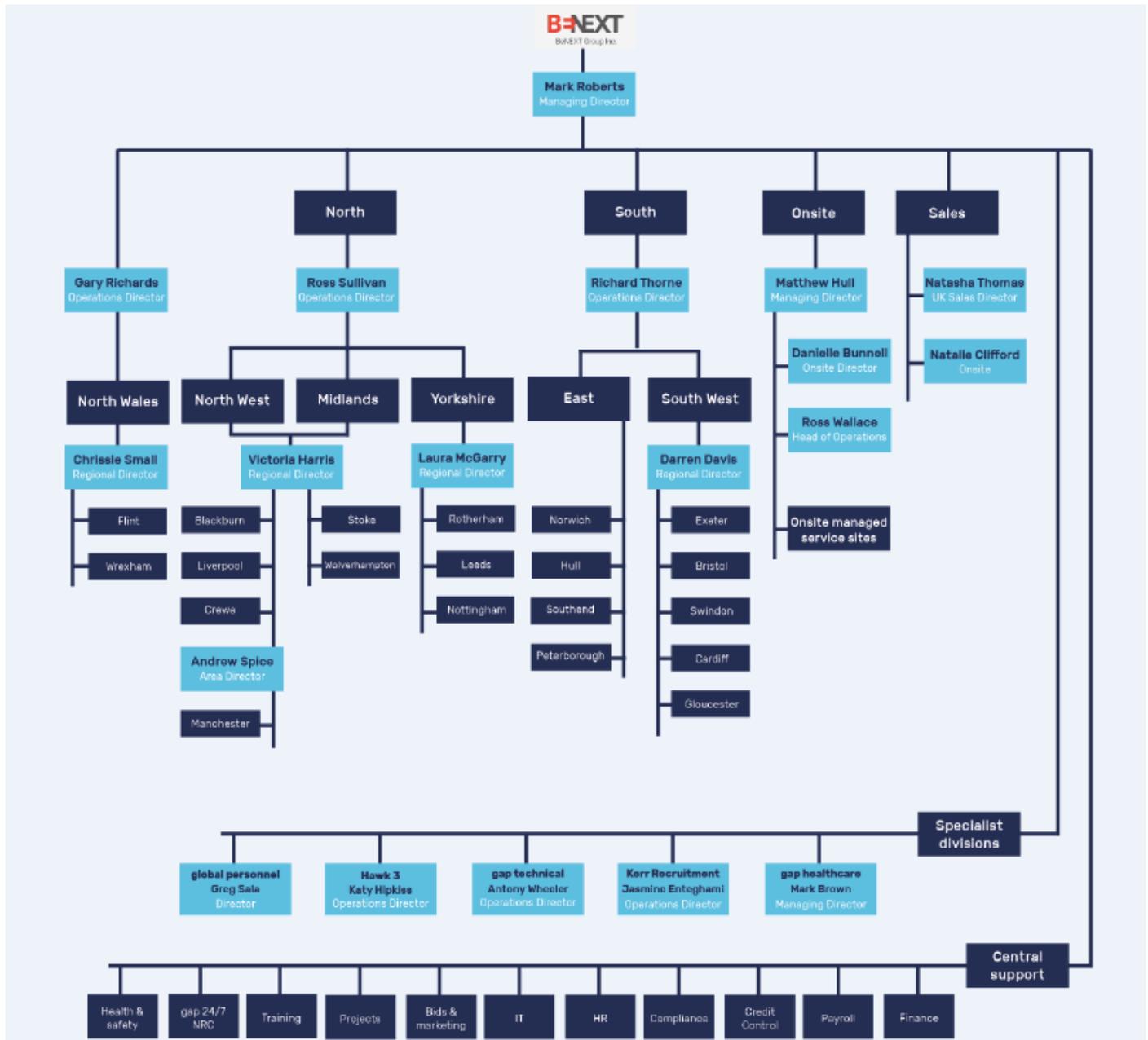
Following 20 years of independent status, gap personnel group became a part of the BeNEXT Group Inc in late 2017. BeNEXT is a global human resource and staffing provider with revenues exceeding £500 million. Following the majority-stake acquisition of gap personnel group, BeNEXT has provided significant investment to enhance the systems, processes, and products offered to our clients to ensure we continue to grow as a market leading recruitment partner.

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.

This policy is applicable to all offices and operations within the gap personnel group as detailed within the footer.

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 group 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
- Business Partner of Stronger Together
- Unseen
- Sedex Member A/B

Our policies

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

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

gap personnel's policies are established by our Compliance Team and HR Department, based on advice from HR professionals, industry best practice, legal partners, and in consultation with REC, ALP and Stronger Together. Overall accountability is held by the Managing Director and driven through the operational network via the Senior Management Team. 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.

Irrelevant of our suppliers' own policy or process in relation to modern slavery, all external business partners, affiliations and suppliers of gap personnel group 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

Our supply chain is categorised as High, Medium or Low risk, determined by the nature of the supplier's business operation. Suppliers categorised as High Risk are those that have the most direct connection to or involvement with workers such as second tier labour suppliers. All High-Risk suppliers are required to undergo annual audits, where any issues or cause for concern are identified, further investigation and remedial actions will be taken, and a re-audit scheduled and completed. Failure to rectify issues identified and/or where the severity of the issues identify are deemed necessary, supplier arrangements will be ceased without notice.

[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 – Worker Welfare

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 Welfare 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

gap personnel recognise that its key resource is the people that it employs. We are committed to investment in our people, by providing training we aim to enhance performance and ultimately, productivity through empowerment to make the best use of an individual's natural ability.

- The initial training plan will be made up of in branch training, e-learning modules and attendance to classroom training for specific courses;
- Included within the E-Learning training sessions is an interactive module on spotting the signs of Modern Slavery which is to be completed by all new starters and refreshed annually;
- 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 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.

2020 performance against modern slavery objectives

2020 for us, like many companies saw the business having to identify new ways of working very quickly due to the coronavirus pandemic. We are very pleased to see the remote processes adopted have not caused any interruption to the companies' ability and strategies to identify cases suspected to relate to slavery, human trafficking and forced labour and that suspicions have been responded to and supported quickly and effectively.



Reported 2 potential cases to the GLAA and local police.



Reported 6 cases of cyber crime where individuals falsely represented themselves as part of gap personnel group with the aim of illegally obtaining payment for work and/or work finding services.



We have not been required to assist in any investigations into cases of forced labour, and have not needed to remove any suppliers from our PSL.

2019 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 2019, gap personnel teams have identified and reported multiple cases suspected to relate to slavery, human trafficking and forced labour.



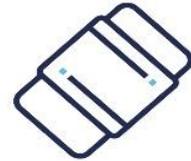
Reported 6 potential cases to the GLAA



Reported 1 potential case to the local police



Assisted human trafficking teams with investigations into 3 cases of forced labour



Removed 1 supplier from our PSL

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 2021 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
Director
01/04/2021