

Policy on Preventing Slavery, Human Trafficking and Hidden Labour Exploitation

Perm Placements Ltd commits to developing and adopting a proactive approach to tackling hidden labour exploitation. The sectors believed to be most affected by Slavery and Human Trafficking are construction, agriculture, textile, security, food processing and packaging, constituting much of Perm Placements's core business. As a UK leading industrial recruiter operating within these key sectors, Perm Placement Ltd realise that we are in at the front line of the recruitment process and key to tackling the problem of hidden labour exploitation. Perm Placement Ltd commits to developing and adopting a proactive approach to tackling hidden labour exploitation.

Hidden labour exploitation is exploitation of job applicants or workers by third party individuals or gangs other than the employer or labour provider including rogue individuals working within these businesses but without the knowledge of management. It includes forced labour and human trafficking for labour exploitation; payment for work-finding services and work-related exploitation, such as forced use of accommodation. It is understood that it is often well hidden by the perpetrators with victims, if they perceive of themselves as such, reluctant to come forward.

Coverage

This policy is applicable to all offices and operations within Perm Placement Ltd, inclusive of Perm Placement Ltd onsite.

Responsibility

Ensuring the policy commitments are upheld; including training, updates and auditing, lies within the Perm Placement Ltd Compliance Team with overall responsibility lying with Phil Chatfield, Co-Founder / Director of Perm Placement Ltd.

In our commitment to the Prevention of Labour Exploitation HR Policy, Perm Placements Ltd appointed local representatives in the form of our Branch and Onsite Managers. Perm Placement's managers are tasked with the responsibility of upholding the HR Policy at a local level to ensure all staff involved in the Recruitment, Management and Supply of Contractors on a day-to-day basis.

Policy Commitments

Perm Placement Ltd shall:

- Designate appropriate managers to attend "Tackling Hidden Labour Exploitation" training and to have responsibility for developing and operating company procedures relevant to this issue.
- Accept that job-finding fees are a business cost and will not allow these to be paid by job applicants. The Company will not use any individual or organisation to source and supply workers without confirming that workers are not being charged a work finding fee.
- Ensure that all staff responsible for directly recruiting workers are aware of issues around third-party labour exploitation and signs to look for and have signed appropriate Compliance Principles.
- 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 hidden worker exploitation to the Gangmasters Licencing Authority and police.

- Provide information on tackling “Hidden Labour Exploitation” to our workforce through various formats, such as workplace posters, worker leaflets, inductions, and other training.
- Encourage workers to report cases of hidden third-party labour exploitation, provide the means to do so and investigate and act on reports appropriately.
- Positively encourage and support employees and agency workers to report such exploitation which may be occurring within their communities.
- Require labour providers and other organisations in the labour supply chain to adopt policies and procedures consistent with the above.

Central Auditing

Perm Placement’s compliance team have built in a number of processes to their audits and our standard business practices which have strengthened our links with external bodies to ensure industry issues (including illegal working prevention and labour exploitation) are addressed through:

- Improved knowledge and understanding of illegal working checks including the implementation of MRZ checker systems and working closely with UKBA and local immigration teams.
- Remote audit reports generated weekly from our integrated IT systems which enable volume analysis of worker records, including duplicate postal/email address and banking information to identify and alert us to suspect activity.
- To conduct formal GLA/Hidden Labour exploitation interviews with our temporary workers during branch and onsite audits – with a commitment to completing 50 per annum throughout our network including any workers supplied via third party agencies.
- To issue online confidential GLA/Hidden Labour exploitation questionnaires to 500 workers per annum.
- Sourced and implemented a multi-lingual Confidential Helpline process, by which issues can be raised confidentially by phone, email or in writing to our branch, onsite manager or a member of our compliance team.
- To communicate our Modern Slavery Policy Statement with all suppliers and obtain commitment that they will uphold our methodology and vision, alongside the completion of an annual “Supply Chain Modern Slavery Risk Survey”.
- To review supplier agreements, processes and audit any second-tier suppliers to ensure the wellbeing of workers provided.

Phil Chatfield
Co-Founder / Director



Modern Slavery Statement – Perm Placements Ltd 2021

Perm Placements Ltd is committed to zero tolerance against human trafficking and worker exploitation. Perm Placements Ltd takes a proactive approach, outlined below, to ensure our own business and that of our clients' supply chain is free of human trafficking and worker exploitation. We also have a responsibility for ensuring compliance to these areas:

- Supply chain partners, including second-tier recruitment agencies, general office and IT suppliers and any service suppliers to support the running of our business must complete a self-declaration on their modern slavery approach and must agree for an independent audit by Perm Placement's Quality Manager. Our business will not support or deal with any business knowingly involved in exploitation of human trafficking.
- All staff working for the group must have adequate references and undertake an annual self-declaration outlining criminal convictions and undertake a 'fit and proper' test in line with GLA requirements.
- Audits – remotely with Compliance team monitoring 100% of workers placed on assignment checking:
 - Right to work checks – workers must prove they are eligible to work in the UK.
 - Bank account – workers must have proof of won/joint bank account.
 - Telephone numbers – workers must be contacted on their own telephone number.
 - Email address – is applicable to the worker and no duplicates.
 - Addresses – a high number of workers are not living at the same address.
 - NI number – workers must provide details of their national insurance number and no duplicates.
 - Workers only complete paperwork at authorized locations, have 1-1
 - Unannounced branch audits to check all areas of recruitment and learning.
- Dedicated confidential telephone number for workers to report concerns of exploitation/human trafficking.
- Systems to encourage the reporting of concerns and the protection of whistle blowers.
- Training – Perm Placement Ltd has delivered human trafficking and worker exploitation training sessions to raise awareness to all staff within both the recruitment and learning sectors. All new starters have formal inductions which outline our compliance requirements and minimum standards to be met to ensure we meet our zero-tolerance approach. Worker interviews have also been conducted this year with plans to increase this in 2021.

Our policies on Preventing Hidden Labour Exploitation, Ethical Trading Policy, Supplier Policy, Compliance Policy and Whistleblowing Policy support our approach outlined above.

This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for the current financial year, 2021.

Phil Chatfield

Co-Founder / Director

