

## Tackling Modern day Slavery and Hidden labour Exploitation Policy

### Policy Statement

QS Recruitment commits to developing and adopting a proactive approach to prevent, respond to and remediate the risks of modern slavery, forced and debt-bonded labour, human trafficking and hidden exploitation within its workplaces.

**Modern slavery** is a broad term used to encompass offences that involve one person depriving another person of their liberty, in order to exploit them for personal or commercial gain.

**Forced labour** is all work or service that is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily.

**Debt-bonded labour** is where a person's labour is demanded as a means of repayment for a loan or service.

**Human trafficking** is the recruitment and transportation of persons by threat, force, coercion or other abuse of power or vulnerability to achieve the consent of a person having control over another person for the purpose of exploitation.

**Hidden labour exploitation** is action up to and including modern slavery which involves the exploitation of workers and job applicants by internal or external individuals without the sanction or explicit knowledge of the employer or labour provider.

### Scope

This policy applies to Nottingham Head office along with all our remote branches

### Responsibility

Kerri Adams, Training and compliance manager, has overall responsibility for this policy.

### Policy Commitments

QS Recruitment commits to developing and adopting a proactive approach to prevent, respond to risks of modern slavery, forced and debt-bonded, human trafficking and hidden exploitation within its workplaces

The senior Management team has designated Kerri Adams to attend the Stronger together course and to have responsibility for developing and operating company procedures relevant to this issue.

Branch Managers are appointed to manage staff and procedures to reduce and identify the risks of modern slavery and hidden labour exploitation at branch locations.

Ensure that all recruitment consultants directly responsible for recruiting workers are trained to be aware of the procedures and how to identify the signs of modern-day slavery.

A Modern Slavery Risk Assessment has been developed and this will be applied retrospectively to existing and all new sites and covers the following key points

- Adherence to local and national laws
- Freedom of workers to terminate employment
- Freedom of movement
- Freedom of association
- Prohibits any threat of violence, harassment and intimidation
- Prohibits the use of worker-paid recruitment fees
- Prohibits compulsory overtime

- Prohibits child labour
- Prohibits discrimination
- Prohibits confiscation of workers original identification documents
- Provides access to remedy, compensation and justice for victims of modern slavery

The Business Ensures that labour sourcing, recruitment and worker placement processes are under the control of trusted and competent Recruitment Consultants. All consultants are aware of our Antibribery and corruption policy

Adopt a proactive approach to reporting suspicions of hidden worker exploitation to the gangmaster licensing authority and police

Agency workers are interviewed face to face, in person and their original documentation is viewed as right to work checks are carried out.

Use of workplace posters and staff questionnaires available in all our branches to provide information to our workforce

All staff within the business have attended our Stronger together training course, helping them identify red flags that indicate an individual may be subject to exploitation.

Positively encourage and support employees and workers to report such exploitation which may be occurring by contacting a member of our team.

The business measures the risk of Modern-day Slavery through KPI's that are reviewed periodically against the ALP and GLAA recommendations from time to time.

Annual review of this policy will be conducted by the Senior Management team and amended from time to time

A handwritten signature in dark ink, appearing to read 'Brian Smith', with some overlapping loops and a horizontal line extending to the right.

**Brian Smith**

**(Operations Director)**