



# ANTI SLAVERY POLICY STATEMENT

## August 2018

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# ANTI SLAVERY POLICY STATEMENT

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## 1 MODERN ANTI SLAVERY STATEMENT FROM THE GROUP MANAGING DIRECTOR

We are committed to improving our practices to combat slavery and human trafficking. We have a zero-tolerance approach to modern slavery across all areas of our Company, as well as in our supply chains. We are committed to ensuring that we are not connected to modern slavery in any way.

This statement is made within our Policy in acknowledgement of obligations in accordance with the Modern Slavery Act 2015 and the Policy sets out the steps that Harmony Recruitment and Development Limited (Harmony) has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Harmony has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity, openness and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within our business or our supply chain.

This Policy is compliant with the General Data Protection Regulation and Data Protection Act 2018.

## 2. OUR SUPPLY CHAIN, DUE DILIGENCE AND RISK

We are committed to supporting people into work and building strong relationships within our local communities and local and national employers.

We do not have a global supply chain.

A contracts register is maintained by the Group Managing Director. Our procurement is carried out in accordance with applicable procurement regulations which is overseen by the Group Managing Director and Company Secretary

We aim to work in partnership with all our subcontractors, employers, suppliers, stakeholders and other business partners to ensure that they share and work towards our opposition to slavery and human trafficking and we expect our suppliers to hold their own suppliers to the same high standards.

As part of our commitment to tackling modern slavery and human trafficking, we have in place systems to:

### Suppliers/Sub Contractors

- Build long standing relationships with our suppliers to help eliminate the risk factors associated with our supply chains
- Identify, mitigate and monitor potential risk areas in our supply chains
- Check and confirm that current and future suppliers are conversant with the terms of the Modern Slavery Act 2015 and that they have suitable steps in place to ensure their suppliers are also conversant with their obligations
- Work only with suppliers who pay the national minimum wage or national living wage as appropriate
- Consider terminating a contract should any associated issue come to light
- Include standard clauses in sub-contract/sub-consultant contracts as appropriate

## Partner Employers

- Mitigate the risk through building established relationships with current employers and work with new employers to mitigate and monitor any potential risks.
- Eliminate the risk factors associated with our employer networks that recruit our clients.
- Monitor our employer networks to ensure compliance with the Modern Slavery Act 2015.
- Deal only with employers who pay their staff the national minimum wage as a minimum.
- Encourage the reporting of any wrongdoing through internal and external whistleblowing procedures.
- Protect whistle-blowers.
- Ensure all our staff are conversant with the terms of this policy and their personal responsibilities through our duty of care and guidance provided within this and our Safeguarding Policy.
- Check with clients through our in work support if there are any associated issues arising.
- Consider terminating our relationship with any employer should any associated issue come to light

Our Company Audit and Compliance team involving auditors, quality and compliance and finance departments, will monitor our processes and report on any associated issues to the Operations Director that come to light.

We have assessed our risk of exposure to slavery and human trafficking as low.

## 3. OUR POLICIES

We aim to work in partnership with all our subcontractors, employers, suppliers, stakeholders and other business partners to ensure that they share and work towards our opposition to slavery and human trafficking. To manage this, as part of our business processes, we will include, where appropriate, specific prohibitions on the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect our suppliers to hold their own suppliers to the same high standards.

We operate a number of internal policies to ensure that we are conducting our business in an ethical, open and transparent manner. These include:

- Recruitment Selection and Retention Policy
- Safeguarding Policy
- Whistleblowing Policy
- Employee Code of Conduct
- Fraud Prevention Policy

## 4. OUR STAFF

Our Anti Slavery Policy is available to all our staff via the company network.

The prevention, detection and reporting of modern slavery in any part of our organisation or supply chains is the responsibility of all those working for us or under our control. Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy. Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of our organisation, supply chains or employers recruiting our clients at the earliest possible stage.

**5. TRAINING**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our Company, with employers and our supply chains, we will provide training for our staff. All staff will be required to participate in training to better understand the risks.

**6. FURTHER STEPS**

Following a review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in employer networks, our supply chains we are committed to improving our practices to combat slavery and human trafficking.

**7. STATEMENT AND POLICY REVIEW**

This statement and policy will be overseen and reviewed annually by the Managing Director. We will know the effectiveness of the steps we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if no reports are received from employees, the public or law enforcement agencies to indicate that modern slavery practices have been identified.

**8. APPROVAL FOR THIS STATEMENT AND POLICY**

This statement and policy has been approved by Harmony Recruitment and Development Limited Board of Directors.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015.