

Modern Slavery Statement

This statement is made as part of Proactive Personnel's Group commitment to eliminating the exploitation of people under the Modern Slavery Act 2015 (the Act). It summarises how Proactive Personnel operates, the policies and processes in place to minimise the possibility of any problems, any risks we have identified and how we monitor them, and how we train our staff.

Proactive Personnel is committed to ensuring that its staff and any workers it supplies (directly or indirectly) are not subject to behaviour or threats that may amount to modern slavery, human trafficking, forced labour, and similar human rights abuses.

This statement is published in accordance with section 54 of the Act, and relates to the financial year Jan 2024 to Dec 2024. It was approved by the board of Directors on 14th December 2023.



Jon Glews
Managing Director

I Our Business

Proactive Personnel Group consists of Proactive Personnel (Holdings) Ltd, Proactive Personnel Ltd & Proactive Personnel West Midlands Ltd and is a limited company operating in the recruitment sector. The business was founded in August 1999 in Telford, Shropshire and now has 12 branches covering the Midlands & the North West. We provide introduction services & supply temporary workers, in the Commercial, Technical, Transport & Industrial sectors. Our branch locations support local communities and are all accessible via strong public transport links with the majority of our offices holding prominent town or city centre locations.

For details of our group structure, see www.proactivepersonnel.net

I.1 Who we work with

All of the hirers that we work with, and all of the work-seekers we provide, are known to and identified by our staff. All of the temporary workers we supply are identified by our staff. Some of these work-seekers operate through their own limited companies which involves further due diligence & financial set up checks.

The hiring companies that we work with are located throughout the UK but predominately in The West Midlands and the North West. Our clients work in various industry sectors but we are aware that we supply food processing & packaging clients, as well as construction, automotive and general manufacturing sectors where the risks for exploitation could be greater. The work-seekers we supply generally live within a commutable distance of a local branch and we actively encourage workers to visit us in branch to form a stronger working relationship and gain opportunities to build trust and support. From our first interaction with any potential workers we highlight our commitment to tackling hidden labour exploitation and include support documents from Stronger Together in our welcome email which all workers

receive as part of the on boarding & registration process. We also actively promote the 'just good work' app to all candidates which provides links and support to workers where English may not be their first language. The support covers what they should expect from working with a recruitment company to direct access to Modern Slavery support and reporting.

1.2 Other Relationships, Partnerships & Associations

As part of our business, we also work with the following organisations:

- GLAA – Gangmasters & Labour Abuse Authority
- ROSPA -The Royal Society for the Prevention of Accidents
- Employment Agency Standards Inspectorate – Department for Business & Trade
- REC - The Recruitment and Employment Confederation
- Stronger Together – Business Partners
- FCSA – Financial Regulators for Payroll Providers
- ICO – Information Commissioners Office
- Prompt Payment Scheme

2 Our Policies

Proactive Personnel Group has a modern slavery policy which forms part of our internal staff's company handbook.

In addition, Proactive Personnel Group has the following policies which incorporate ethical standards for our staff and our suppliers.

- Corporate Social Responsibility Policy
- Ethical Trading Policy
- Equality, Diversity & Inclusion Policy
- Whistleblowing Policy
- Anti-Bribery Policy

2.1 Policy development and review

Proactive Personnel's policies are established by our Directors & our Senior Partners based on advice from HR professionals, industry best practice and legal advice, and in consultation with our Clients, candidates & Third Party Suppliers. We review our policies annually or as needed to adapt to legislative changes.

3 Our Processes for Managing Risk

In order to assess the risk of modern slavery, we use the following processes with our suppliers:

- When engaging with suppliers, we ask for evidence of their processes and policies, including commitments around modern slavery, human trafficking, forced labour, human rights, and whistle-blowing.

- We conduct supplier checks / audits before entering into a commercial relationship with any business where there is the potential for risk. These audited businesses form the basis of our preferred supplier list.
- We review the potential for risk at regular intervals, including the possibility of re-auditing a supplier or conducting spot checks.

With regard to us supplying workers to our clients, we request information on Modern Slavery risks as part of the initial client supply process. This information is fully documented and saved within our CRM system. We pride ourselves on being able to offer support and relevant data to assist our clients with their own audits. We are keen to work with our clients in managing the risk beyond the initial recruiting service and actively encourage joint ventures to support and assist vulnerable workers.

Through staff awareness and internal audits, we have only had to investigate a minimal number of 'Red Flag' alerts. However, we continue to be aware of the potential for problems and work with our clients to identify methods and procedures to protect and provide support to vulnerable workers. We conduct branch and department audits which check all documentation including 'red flag' areas of bank accounts, shared addresses, shared telephone numbers and Right to Work documentation.

Reported information – Internal

Auditing process & pension report identified shared e-mail address linked to applicant's payslips and crosschecked against all other forms of ID.

Reported Information - External

Misuse of Right to Work documentation – Worker using another person's documents to illegally obtain work. Identified by a senior consultant and reported to the client and authorities.

We have taken the following steps to minimise the possibility of any problems:

- We reserve the right to conduct spot-checks of the businesses who supply us, in order to investigate any complaints.
- We require the businesses we work with to abide by our code of supplier conduct
- We collaborate with our suppliers in order to improve standards and transparency across our supply chain.
- Only senior members of staff who have undergone appropriate training for assessing modern slavery risks in the supply chain are authorised to sign contracts and establish commercial relationships in any area where we have identified the potential for risk.
- We ensure that all of our suppliers are members of appropriate industry bodies and working groups.
- We aim to collaborate and develop strategies with our clients to support all parties in the supply chain.

- We will be developing further our client engagement data to request more Modern Slavery information and will be reviewing the format and processes for gaining information from our clients to improve its accuracy and relevance to the end worker.

All staff have been encouraged to bring any concerns they have to the attention of management.

4 Our Performance & Commitment

As part of monitoring the performance of Proactive Personnel Group, we track the following general key performance indicators:

- In depth staff inductions – providing information on Modern Slavery and its impact on our business, clients and workers
- Continuous training – opportunities to highlight Modern Slavery ‘Red flag’ issues within different sectors
- Highlighting Modern Slavery as part of our company presentation and identifying how our clients deal with the issue in-house.
- Committing to working with our clients to jointly protect all workers throughout their employment journey with us and not just during the induction / on boarding stage
- The availability of video training materials is actively promoted at the start of each new year to ensure all staff complete an annual re-fresh.
- The annual refresh training form asks questions of our staff to ensure they have understood the training fully and also allows staff to request additional support if necessary.
- Staff Appraisals – Ensuring staff feel confident with the subject and how to report it, and have access to supportive materials from Stronger Together.
- We have increased our internal auditing capabilities and now actively support branches with clients in high risk sectors. This can involve regular contract audits as well as KPI data being collated and available to our clients.

Based on the potential risks we have identified, we have also established the following key performance indicators, which are regularly assessed by our board of Directors & Senior Partners.

- the percentage of suppliers who sign up to an appropriate code / provide their own modern slavery statements
- the effectiveness of enforcement against suppliers who breach policies
- the amount of time spent on audits, re-audits, spot checks, and related due diligence
- the level of modern slavery training and awareness amongst our staff

We benchmark our indicators against industry best-practice in order to ensure that we do not put undue pressure on our suppliers that might increase the potential for risk.

5 **Our Training**

All of our staff receives training and support that is appropriate to their role. In particular:

- Our leadership team receive detailed training in identifying and resolving concerns around modern slavery and human trafficking.
- Our staff involved in our procurement and supply chains undertakes training courses that include guidance around modern slavery and human trafficking, as well as other wider human rights issues.
- All of our staff receives awareness-raising information around issues involving modern slavery and human trafficking, so that they can bring any concerns they have to the attention of management.
- All trainee Consultants to complete 'Recruiter Compliance Principles' as part of their induction followed up by small group or one to one Modern Slavery induction training.
- A fully comprehensive training, policies and documentation folder is available to all staff on the internal K Drive intranet.
- GLAA licencing information along with the latest videos from the GLAA & Stronger Together are available to all staff via our 'Hub' intranet.
- All workers receive a welcome e-mail, which includes information on Modern Slavery in multiple languages from Stronger together as well as actively promoting the 'Just Good Work' app particularly if English isn't their first language.
- Additional staff members have become Modern Slavery Champions including a second staff member attending Stronger Together awareness training.
- Attendance on external training and webinars is encouraged with senior staff attending ALP online courses.
- All candidates must have their own bank accounts and this is crossed checked with ID. Anyone unable to provide their own bank details is offered support in opening an account.
- All consultants are trained in discussing Modern Slavery with their clients to identify opportunities to collaborate and offer support. For example, the introduction of a 'worker checklist' with spot check questions asked by GLAA inspectors.

As part of our training, our staff are encouraged to discuss any concerns that they have in branch or confidentially if requested.

Training is refreshed annually or when promotion to a senior level dictates a necessary increase in knowledge, in order to successfully disseminate down to other staff members.