



Modern Slavery Statement 2025/2026

Modern Slavery Statement

This statement is made as part of Proactive Personnel Group's commitment to preventing and eliminating the exploitation of people in accordance with the Modern Slavery Act 2015 (the Act). It outlines how Proactive Personnel operates, the policies and procedures in place to minimise the risk of modern slavery, the risks we have identified and how they are monitored, and the training and awareness provided to our staff.

This statement is published in accordance with section 54 of the Act and relates to the financial year from January 2026 to December 2026. It was approved by the Board of Directors on 17 December 2025.



J GLEWS
Managing Director

1. Our Business

Proactive Personnel Group consists of Proactive Personnel (Holdings) Ltd, Proactive Personnel Ltd, and Proactive Personnel West Midlands Ltd. We are a UK-based recruitment business operating as a limited company.

Founded in August 1999 in Telford, Shropshire, the Group now operates 12 branches across the Midlands and the North West. We provide permanent introduction services and the supply of temporary workers across the Commercial, Technical, Transport, and Industrial sectors.

Our branch locations support local communities and are accessible via strong public transport links, with the majority of offices located in prominent town or city centre locations.

Further details of our group structure are available at:
www.proactivepersonnel.net

1.1 Who We Work With

All hirers we work with, and all work-seekers we supply, are known to and verified by our staff. All temporary workers supplied by Proactive Personnel are fully identified and registered. In some cases, work-seekers operate through their own limited companies, which requires additional due diligence and financial setup checks.

Our clients are located throughout the UK, predominantly within the West Midlands and the North West. We operate across a wide range of industry sectors, including food processing and packaging, construction, automotive, and general manufacturing, where the risk of labour exploitation may be higher.

The work-seekers we supply generally live within commuting distance of their local branch. We actively encourage in-branch engagement to build trust, strengthen working relationships, and provide ongoing support.

From the first point of contact, we clearly communicate our commitment to tackling labour exploitation. All workers receive a welcome email as part of the onboarding and registration process, which includes multilingual support materials from Stronger Together.

1.2 Other Relationships, Partnerships & Associations

As part of our operations, we work with and engage the following organisations:

- Gangmasters and Labour Abuse Authority (GLAA)
- The Royal Society for the Prevention of Accidents (RoSPA)
- Employment Agency Standards Inspectorate – Department for Business and Trade
- Recruitment and Employment Confederation (REC)
- Association of Labour Providers Members (ALP)
- Stronger Together (Business Partners)
- Freelancer & Contractor Services Association (FCSA)
- Information Commissioner's Office (ICO)
- Prompt Payment Scheme

2. Our Policies

Proactive Personnel Group has a dedicated Modern Slavery Policy, which forms part of the internal staff company handbook.

In addition, we operate a range of policies that embed ethical standards across our business and supply chain, including:

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

2.1 Policy Development and Review

Our policies are established and approved by the Directors and Senior Partners, informed by HR professionals, industry best practice, legal guidance, and consultation with clients, candidates, and third-party suppliers where appropriate. Policies are reviewed annually or updated in response to legislative or operational changes.

3. Our Processes for Managing Risk

To assess and manage the risk of modern slavery within our supply chain, we implement the following measures:

- When engaging suppliers, we request evidence of relevant policies and procedures, including commitments relating to modern slavery, human trafficking, forced labour, human rights, and whistleblowing.
- Supplier checks and audits are conducted prior to entering commercial relationships where risk is identified. Approved suppliers form part of our preferred supplier list.
- Supplier risk is reviewed at regular intervals, including spot checks where appropriate.

When supplying workers to clients, we request information on modern slavery risks as part of the initial client onboarding process. This information is documented and retained within our CRM system. We actively support our clients by providing relevant data and guidance to assist with their own compliance and audit requirements.

Through staff awareness, training, and internal audits, only a small number of red-flag concerns have required investigation. However, we remain vigilant and continue to work collaboratively with clients to identify and implement procedures to protect and support vulnerable workers.

We conduct regular branch and departmental audits, reviewing documentation such as bank account details, shared addresses and telephone numbers, and Right to Work documentation.

Actions to Reduce Risk

To minimise the risk of modern slavery, we:

- Reserve the right to conduct spot checks on customers and suppliers where concerns or complaints arise.
- Complete worker questionnaires in high risk areas using templates supplied through stronger together.
- Restrict contract approval in higher-risk areas to trained senior staff only
- Collaborate with clients to develop strategies that support workers
- Continue to enhance client engagement data to improve the quality and relevance of modern slavery information
- Quarterly review at branch level to ensure companywide compliance
- Annual review of processes, risk and best practice by a senior modern slavery response team
- Require suppliers to comply with our Supplier Code of Conduct
- Ensure suppliers are members of appropriate industry bodies and working groups
- Work collaboratively with suppliers to improve transparency and standards across the supply chain

All staff are encouraged to raise concerns with management at any time.

4. Our Performance and Commitment

To monitor performance, Proactive Personnel Group tracks the following key indicators:

- Comprehensive staff inductions covering modern slavery and labour exploitation
- Ongoing training highlighting sector-specific red-flag indicators
- Inclusion of modern slavery awareness within company presentations and client discussions
- Joint working with clients to protect workers throughout their employment journey
- Annual mandatory refresher training supported by video materials
- Training assessments to confirm understanding and identify additional support needs
- Enhanced internal auditing and targeted support for branches operating in higher-risk sectors

We benchmark our approach against industry best practice to ensure standards are maintained without placing undue pressure on suppliers.

5. Our Training

All staff receive training appropriate to their role, including:

- Advanced training for leadership teams on identifying and responding to modern slavery risks
- Targeted training for staff involved in procurement and supply chains
- Awareness-raising training for all staff to encourage early reporting of concerns
- Mandatory “Recruiter Compliance Principles” training for trainee consultants, followed by modern slavery induction sessions
- Access to comprehensive policies, training materials, and documentation via the internal intranet
- Access to GLAA licensing information, Association and Labour Providers (ALP) and Stronger Together training resources
- Multilingual modern slavery guidance provided to all workers as part of onboarding
- Appointment of Modern Slavery Champions and attendance at Stronger Together awareness training
- Encouragement for senior staff to attend external training, webinars, and ALP courses
- Verification of worker bank accounts, with support provided where assistance is required
- Training for consultants on discussing modern slavery risks with clients and identifying collaborative solutions

Staff are encouraged to raise concerns openly in branch or confidentially where requested. Training is refreshed annually or when staff progress to senior roles to ensure knowledge is effectively shared across the business.