

## **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.

This statement is published in accordance with section 54 of the Act, and relates to the financial year Jan 2021 to Dec 2021. It was approved by the board of Directors & Senior Partners on 19<sup>th</sup> Nov 2020.



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. We provide introduction services & supply temporary workers, in the Commercial, Technical, Transport & Industrial sectors.

For details of our group structure, see [www.proactivepersonnel.net](http://www.proactivepersonnel.net)

#### **1.1 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.

The hiring companies that we work with are located throughout the UK but predominately in The West Midlands and the North West. The work-seekers we supply live generally within a commutable distance of a local branch.

#### **1.2 Other relationships**

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

- GLAA – Gangmasters & Labour Abuse Authority
- ROSPA
- BEIS – Department for Business, Energy & Industrial Strategy
- The Recruitment and Employment Confederation
- CIRAS
- Stronger Together – Business Partners

### **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

## **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 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 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.

After due consideration, we have not identified any significant risks of modern slavery, forced labour, or human trafficking in our supply chain. However, we continue to be alert to the potential for problems.

Additionally, 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.

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

## 4 Our Performance

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
- Continuous training – role play/ scenario training to highlight Modern Slavery red flag issues
- Staff Appraisals – Ensuring staff feel confident with the subject and how to report it.

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.
- A fully comprehensive training, policies and documentation folder is available to all staff on the internal K Drive intranet. This includes updates relating to COVID19 and its impact on reporting modern Slavery.

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.