

Modern Slavery

Modern slavery covers slavery, servitude, forced and compulsory labour and human trafficking. It is often intertwined with organised crime and victims are treated as commodities and exploited for criminal gain.

The Modern Slavery Act, (the “Act”), was published in 2015 and builds upon existing legislation, consolidating a number of different offences into a single act. These offences are set out and defined below:

<u>Slavery</u>	Where a person exercises ownership over another
<u>Servitude</u>	Where a person is coerced into providing services and is unable to effect a change in his/her circumstances
<u>Forced Labour</u>	Where a person is forced to work or provide a service, fearing reprisal if he/she does not comply
<u>Human Trafficking</u>	Where a person arranges or facilitates the travel of another person with the knowledge or intention to exploit that person

Section 54 of the Act also brings into effect a requirement for large organisations with UK operations to provide a statement detailing the steps that they have taken to ensure that modern slavery and human trafficking are not taking place within their business or supply chains.

This is the statement of Bowdall Recruitment Solutions Limited.

Introduction

As a leading independent short term staffing provider in the UK, Bowdall Recruitment Solutions recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

Bowdall Recruitment Solutions is absolutely committed to preventing slavery and human trafficking in its business activities, and to ensuring that its supply chains are free from slavery and human trafficking. To date we have not found any indicators or instances of modern slavery in our business or its supply chain.

This statement sets out the actions that Bowdall Recruitment Solutions has taken to understand potential slavery and human trafficking risks related to its business. It details several preventative measures put in place to minimise the risk of activity, which is prohibited under the Act, taking place within its business or supply chains.

In this regard, this statement relates to actions and activities of Bowdall Recruitment Solutions in the financial year ended 2020. It also contains key actions that Bowdall Recruitment Solutions intends to take over the next 12 months.

Organisational Structure

Bowdall Recruitment Solutions operates one office in Middlesbrough, Teesside with [number of staff] and [number of care staff] colleagues providing short-term staffing for our clients.

Responsibilities

Responsibility for the business anti-slavery initiatives is as follows:

- **Policies:** The Corporate Policy Manager is responsible for managing and leading the development of new, and the review of existing, policies and procedures across Bowdall Recruitment Solutions. All policies are ratified by the Governance and Risk Committee (GRC) and approved by the Care, Quality and Safety Committee (CQSC). The policies relevant to the Act are set out under the section entitled “Protecting our Employees” and are subject to review on an annual basis.
- **Training:** The Learning and Development team are responsible for the training and development of colleagues. Training needs are reviewed on an annual basis and solutions are developed that are relevant to our business and its needs. In relation to the Act, the team continues to monitor and drive completion rates of an existing elearning module, bespoke to our sector entitled “Modern Slavery Act – Preventing Exploitation.” This was initially rolled out in [date of training launch], HR professionals and internal auditors. In 2020 the roll-out of the elearning module will be the duty of the training manager.
- **Risk Assessments, Governance and Control:** Bowdall Recruitment Solutions maintains a strategic risk register which is designed specifically to ensure compliance with both regulatory and legislative requirements and is reviewed on a monthly basis by the Leadership Team. This ensures that governance arrangements and controls, put in place to mitigate any risks identified, continue to be effective and fit for purpose.
- **Investigation/due diligence:** Bowdall Recruitment Solutions internal audit team is responsible for periodically reviewing any areas of significant risk to assess whether the agreed governance arrangements and controls have been implemented successfully and are working effectively. All members of the internal audit team are required to complete the elearning module entitled “Modern Slavery Act – Preventing Exploitation” so that they are suitably equipped for this task.

Protecting our Colleagues

Bowdall Recruitment Solutions is committed to treating all its colleagues in a fair and consistent manner and in accordance with our values: respectful, trusted, caring and making a difference. FSHC operates the following policies that describe its approach to modern slavery risks and the steps to be taken to prevent human trafficking within its operations:

- **Employee Code of Conduct:** Bowdall Recruitment Solutions is committed to achieving and maintaining high standards of professional and ethical conduct amongst all colleagues. Our expectations are made clear through several existing policies including, but not limited

to, the Anti-Bribery and Corruption Policy, the Bullying and Harassment Policy, the Equality and Diversity Policy and the Disciplinary Policy.

- **Recruitment Policy:** Bowdall's Recruitment Policy requires any agency involved in the identification of candidates for Bowdall Recruitment Solutions to comply with all relevant legislation. Bowdall Recruitment Solution actively reviews their policies and procedures on an on-going basis, and in light of emergent legislation, it only engages with reputable and compliant agencies.
- **Eligibility to Work Policy:** Bowdall's Eligibility to Work Policy recognises that illegal workers are often the most vulnerable and exploited workers in the UK. It has therefore been designed to ensure that all Bowdall Recruitment Solutions colleagues are aware of their responsibilities in relation to tackling illegal working; namely to ensure that all current and prospective colleagues have had a right to work check, prior to them commencing work with Bowdall Recruitment Solutions, confirming that they are legally entitled to work in the UK.
- **Whistleblowing Policy:** Bowdall Recruitment Solutions whistleblowing policy provides a mechanism for colleagues and others, to raise confidential concerns.
- **Employee Handbook:** Bowdall Recruitment Solutions employee handbook provides information to all colleagues on their statutory rights, including, but not limited to, sick pay, holiday pay and any other benefits that they might be entitled to by virtue of their employment.

Training

All staff within the business are required to complete the e-learning module entitled "Modern Slavery Act – Preventing Exploitation." In 2020.

The e-learning modules cover:

- How to assess the risk of slavery and human trafficking in relation to various aspects of the business or our Clients, including resources and support available.
- How to identify the signs of slavery and human trafficking.
- What initial steps should be taken if slavery or human trafficking is suspected.
- How to escalate potential slavery or human trafficking issues to the relevant individuals within Bowdall Recruitment Solutions or our Clients.
- What external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger Together" initiative.
- What messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies.
- The steps Bowdall Recruitment Solutions should take if Clients do not implement anti-slavery policies in high risk scenarios, including their removal from our client list.

Awareness Raising Programme

As well as training, Bowdall Recruitment Solutions continues to raise awareness of the Act by displaying documentation on office notice boards and circulating a series of emails/notices to all Staff and having a notice on the staff internet portal.

The documentation explains:

- **The basic** principles of the Act.
- **How slavery** or human trafficking can be identified.
- **What colleagues** can do to flag up potential slavery or human trafficking issues to individuals within Bowdall Recruitment Solutions.
- **What external** advice is available, for example through the Modern Slavery Helpline and Hope for Justice charity.

Signature

Signature

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Bowdall Recruitment Solutions
[Date]

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