Policy No.32
Tackling Modern Slavery Policy

Adore Recruitment Ltd commits to developing and adopting a proactive approach to prevent, respond to and remediate the risks of modern slavery, forced and debt-bonded labour, human trafficking and hidden exploitation within its workplaces, namely complete prevention of the following.

Modern slavery
A broad term used to encompass offences that involve one person depriving another person of their liberty, in order to exploit them for personal or commercial gain.

Forced labour
Work or service that is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily.

Debt-bonded labour
Where a person's labour is demanded as a means of repayment for a loan or service. Human trafficking is the recruitment and transportation of persons by threat, force, coercion or other abuse of power or vulnerability to achieve the consent of a person having control over another person for the purpose of exploitation.

Hidden labour exploitation
Action up to and including modern slavery which involves the exploitation of workers and job applicants by internal or external individuals without the sanction or explicit knowledge of the employer or labour provider.

Scope of Policy
This Policy applies to Adore Recruitment Ltd, and all it's employees. Trading address and Head Office at;
Network House
Christy Way
Southfields Business Park
Basildon, Essex
SS15 6TR

Responsibility
Michelle Aldridge, CFO has day to day responsibility for maintaining this Policy, and Samantha Clark, Director has overall responsibility for the policy.

Policy Commitments
A **COMMITMENT** to tackle modern slavery risks within our business
1. The roles and responsibilities for tackling modern slavery risks within Adore Recruitment is as follows.
   A. Director – Overall Responsibility, Training, Enforcement, Communication, Compliance & Overall Management
   B. CFO – Day to day Responsibility, Training, Enforcement, Communication, Management Compliance & Reporting.
   C. Administrators – Checking RTW, compliance and process
   D. Recruitment Consultants – working within the Recruiter Compliance Principles, Compliance and RTW

2. Adore Recruitment Ltd is fully committed to provide appropriate training and awareness information for all of it's staff. In particular:

All of our staff receive 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. Any staff, workers or other parties are strongly encouraged to report any concerns or suspicions that they might have to Samantha Clark at Adore Recruitment Ltd.

Reports surrounding these issues are taken extremely seriously by our Director, who is committed to ensuring that, all investigations shall be prompt and effective. If our investigations reveal any issues, we are committed to taking appropriate action. All staff are provided with a copy of our Modern Slavery Policy. This is distributed by Adore Recruitment to make sure that staff understand our positions around modern slavery, forced labour and human trafficking, how they can get support from our business, and who is responsible for the policy.

We have stringent right to work checks and as part of the onboarding process for new agency workers we commit to fully identifying them, and this includes photo ID in all cases. We follow this up by ensuring that we only pay salaries into bank accounts in the Agency workers names, not to spouses or friends etc, thereby alleviating risk of modern slavery.

As part of our induction process it is communicated to staff that all of the hirers that we work with, and all of the work-seekers we provide, are known to and identified by our staff face to face (or via video currently due to COVID restrictions). All of the temporary workers we supply are identified by our staff individually. We do not supply work-seekers to hiring companies through from any intermediaries or use any umbrella companies in our payroll process. We also ensure the hiring companies that we work with are located in the UK and that the workers we supply live in UK.

All internal staff are trained on the following principles and sign and agree to adhere to the following;

1. Only interview applicants in an approved location.
2. Not allow job applicants to complete registration documents on behalf of others.
3. Not use a supplier for labour outside of the business approved suppliers without first obtaining authorisation from a manager and approval from the client in writing.
4. Not accept money, favours or any gifts at all from job applicants or workers.
5. Not loan any personal money to temporary workers.
6. Notify a manager when informed by a job applicant or worker that they have paid money to be introduced to the Company.
7. Not allow unauthorised agents or individuals to introduce job applicants to the Company, including friends, family or “local contacts” to source workers to satisfy urgent demand.
8. Notify a manager when suspecting an individual of introducing job applicants to the Company for personal gain.
9. Not act as a landlord or be involved in the provision of accommodation, transport or other paid-for services to workers.
10. Not allow anyone other than a person authorised by management to choose which workers are selected for work shifts.
11. Not force or coerce temporary workers to work against their will.
12. Not threaten or subject workers to physical or mental mistreatment.
13. Treat applicants and workers with dignity and respect.
14. Raise any knowledge or suspicions of illegal or dubious activities regarding agents, temporary workers or colleagues to a manager immediately.

3. Adore Recruitment has developed and implemented the following policy documents to prevent and address modern slavery risks at our site;

A. Anti-Bribery and Corruption Policy
B. Responsible Recruitment Policy
C. Recruiter Compliance Principles

D. Workplace Incident Investigation Checklist
E. Worker Questionnaire
F. Worker interview questions

All these documents are available in printed format in our Policy document in our office, and we are currently working to get all of these available on our website.

B. **ASSESSMENT** of modern slavery risks
We have completed a review of this policy and statement against our activities to establish whether the approach we have taken follows emerging best practice by:

A. Assessing and interpreting any recent or emerging case law and best practice;
B. Benchmarking our activities against statements and action plans undertaken by similar public and private organisations.
C. Re-evaluating the risk of non-compliance.
D. We have Introduced new processes and procedures in relation to recruitment.
E. Confirmed the applicability and enforceability of clauses and conditions included in our legal agreements and contracts.

The biggest risk of non-compliance is the registration of workers without correctly verifying their identity, and individual right to work. Full training is given all Adore Recruitment staff to ensure they fully understand the Right to work and identity checks needed to comply with law. A second layer of checks are made in our internal Payroll and Finance department and any non EU Visa's are compliance double checked.

Language support is offered to the workers should they struggle to understand any parts of the documentation.

Risks are mitigated by only supplying UK workers, already based in the UK, and not supplying accommodation; however proof of address is verified as part of the recruitment compliance process.

C. **ACTION** we take to prevent and deal with identified risks of modern slavery

1. We ensure each worker has their identity logged on our CRM with photo ID held with an image of them holding it, to ensure the worker is the person on the RTW documentation. We do not accept the registration of family members or friends, only the worker themselves directly.
2. Ongoing internal training is provided, including how the global effect of COVID could affect workers
3. We ensure workers are paid on time each week.
4. We ensure that the workers bank account name that wages are paid into matches the name of the worker
5. We only employ workers over the age of 18
6. We provide PPE required at no charge to the worker
7. We encourage and promote open dialogue with workers and consult with workers who may face workplace closures, reduced hours or contract terminations to combat misinformation and denial of labour rights.
8. We fully engage with Suppliers and perform on site risk assessments including policy review regarding on-site standards including Agency Worker Rights, Health and Safety, Inductions, correct rest break intervals, hygiene provision and PPE requirements to prevent risks of modern slavery. This includes ensuring access to health care and medical supplies including protective material such as facemasks are provided to all workers without any discrimination on the basis of sex, race, religion, language, nationality, disability, migrant status, sexual orientation, gender identity or membership in a social group facing marginalization.

D. **RESPONDING** to protect and provide remedy for victims of modern slavery within your business

Any staff, workers or other parties are strongly encouraged to report any concerns or suspicions that they might have to Samantha Clark at Adore Recruitment Ltd. Reports surrounding these issues are taken extremely seriously by our Director, who is committed to ensuring that, all investigations shall be prompt and effective.

Alternatively report it to the Governing Bodies.

- Call the Modern Slavery Helpline on 08000 121 700 or fill out an online form.
- Contact the Gangmasters and Labour Abuse Authority to report concerns about the mistreatment of workers on 0800 432 0804, or by email intelligence@glaa.gsi.gov.uk
- Contact Crimestoppers on 0800 555 111
- Contact the Police
- Contact Anti-Slavery International or other specialist anti-slavery organisations

E. **MONITOR** progress to prevent, respond to and remediate the risks of modern slavery.
All Adore Recruitment staff are asked to report any signs of the following in agency workers;

- appear to be under the control of someone else and reluctant to interact with others.
- not have personal identification on them.
- have few personal belongings, wear the same clothes every day or wear unsuitable clothes for work.
- not be able to move around freely.
- be reluctant to talk to strangers or the authorities.
- appear frightened, withdrawn, or show signs of physical or psychological abuse
- dropped off and collected for work always in the same way, especially at unusual times, i.e. very early or late at night.

F. Communicate
Adore Recruitment makes the following efforts to be open and transparent and to report in line with recognised good practice. This can be recognised in our modern slavery Statement.

Adore Recruitment utilises all communication channels available to correspond with workers, including.

- Social media and Marketing
- Email
- CRM monitoring and Reporting
- Video Calls (Whilst COVID restrictions)
- Face to face meetings

This commitment in our communication includes the sharing of policy information with our suppliers & workers by av.