

Modern Slavery Statement 2021

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1. Introduction

March 2021

ALS Managed Services was launched in 2014, providing temporary labour to the Waste and Recycling, Warehousing and Manufacturing sectors throughout the UK.

People are the principle focus of our organisation, and this led to a refresh of our brand in 2021 to evolve to ALS People, embedding the strapline of Responsible Recruitment into our logo and culture.

We recognise we supply sectors that are high risk for exploitation, human trafficking and modern slavery. We have a moral and legal obligation to go above and beyond in our pursuit to identify, support and rescue potential victims, whilst adopting a zero-tolerance approach towards anyone suspected of committing offences.

2020 has proven particularly successful for us in what have been unprecedented times in the business world. This success highlights our ability to adapt and move forwards in challenging market conditions. The Covid-19 pandemic has evolved the way we recruit, work and live and therefore presents new challenges in our fight against modern slavery and has been specifically covered within our risks in Section 4 of this statement.

Responsible Recruitment is more than a strapline for ALS People, it is a culture and ethos we continue to spread amongst our people, our customers, and our workforce. This culture helps to reduce our exposure to modern slavery by promoting active engagement with the workforce, a principle of 'if in doubt, shout' and ensuring our workers feel supported and encouraged to speak up if they feel their wellbeing is at risk. This approach will help us to identify, rescue and support victims whilst also providing a deterrent to potential gangs.

We will continue to maximise our own efforts and collaborate with our customers to eradicate modern slavery and raise awareness of the risks. 2020 has brought an increased awareness of modern slavery in our core sectors through several highly publicised cases. We will ensure we learn from the commentary on these cases and continue to implement the best possible practices in our own business.

As our business evolves, we continue to work closely with trusted suppliers and partners to improve their ability to identify and manage the risks of modern slavery. We will continue to audit our supply chain and go further by investigating the 2nd and 3rd tiers of higher risk suppliers, for example our PPE supplier with foreign-based secondary or tertiary suppliers (see Risk Profile in Section 4).

We have strengthened our involvement with Slave Free Alliance, Stronger Together and Hope for Justice to help ensure we remain diligent and focused on eliminating the risks of modern slavery.

We are also signatories to the Welsh Government's Code of Practice for Ethical Employment. We have ensured a transparent and collaborative approach with these organisations, embracing their knowledge and training to ensure our team, suppliers and temporary workers are fully engaged and willing to raise concerns about welfare issues.

We have rolled out new internal training, attended workshops and seminars from industry leading bodies, introduced a modern slavery toolkit for all customer facilities, completed gap analysis with Slave Free Alliance and strengthened our processes for introducing new suppliers to our business.

We feel it is integral to our business to continue to do more. We have set out an ambitious and measurable list of actions we will strive to complete in 2021 to further protect our clients, our workers and our own reputation as we advance our fight against modern slavery.



2. Our business and supply chains

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We operate a 'hub and spoke' model of recruitment, having never seen a branch-based model as being the future of recruitment, we continue to run our business with limited office infrastructure. This helped us grow substantially during the Covid-19 pandemic as we could quickly adapt and roll-out new locations.

Our Head Office in Caerphilly, South Wales supports operations throughout the UK. We utilise a selective panel of partner recruitment agencies to support national contracts, allowing us to provide innovative solutions to public and private sector customers across the UK.

Our regional teams operate onsite or work from home, ensuring geographical coverage across large parts of the UK. This team has grown by over 40% throughout 2020 and we are therefore putting an increased focus on ensuring our culture cascades effectively throughout all levels of our business. We have a proactive approach to internal training to ensure our team, particularly those that deal with temporary workers daily, are fully aware of the risks of modern slavery. We have also introduced a suite of eLearning alongside specific KPI's linked with this area.

We have introduced central resource to ensure we control, coordinate and manage our temporary workforce and provide additional compliance checks to further reduce the risk of modern slavery. Our payroll procedures, compliance checking, onboarding process and ongoing interaction with the workforce ensures we have regular engagement, check the welfare and support our people.

Our presence in the Warehousing sector has increased throughout 2020, and we recognise therefore that there is an increased risk of modern slavery from the substantial seasonal fluctuations in this sector and have introduced new initiatives to ensure we remain resilient.



3. Policies, procedures and corporate governance

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Our commitment to eradicating modern slavery is weaved into many of our internal policies and procedures to ensure it remains relevant and a high priority in all our activities.

People policies

We cover all aspects of our employee journey (both temporary and permanent colleagues) including:

- Recruitment and Eligibility to Work
- Conduct
- Welfare and Wellbeing
- Whistleblowing
- Performance Management

Our people policies are further embedded into our ISO9001:2015 accreditation, ensuring we engrain quality standards into all that we do.

Supplier policies

We are a predominantly service driven business so have a limited supply chain. Strict controls are in place to reduce our risks, including:

- Annual Supplier Audits
- Requirement to demonstrate modern slavery policies
- Suppliers approved at board level
- Ethical Sourcing Standards (where relevant). Suppliers are risk assessed and an appropriate monitoring plan is agreed at board level and reported quarterly.

As part of our initiatives to improve our approach to modern slavery we have identified our supply chain as an area of concern and will complete additional, unannounced audits of our suppliers on top of our existing annual audits.

External verification

We utilise external HR support to verify all policies and procedures and to identify further initiatives we can introduce to learn best practice from larger organisations. We review our own statement and policies against the actions of larger corporations and industry leaders in all sectors, including entities with large supply chains, significant reliance on temporary labour as well as similar profile companies to our own. Our procedures are reviewed annually by Slave Free Alliance to ensure we remain at the forefront of the fight against modern slavery.

We have attended a variety of seminars provided through our membership of Slave Free Alliance. We learn from our peer group and examples of excellence in the sectors we service and have taken key learnings into our business.



Responding to concerns

We have increased the number of communication points with our workforce and provided additional mechanisms for them to ask for help. These include:

- Internal whistleblowing helplines
- Hope for Justice contact details
- Escalation contacts for complaints about ALS staff treatment
- Customer specific whistleblowing helplines

We recognise that any report of modern slavery from within our workforce presents a fluid and evolving circumstance and that it is difficult to formalise a decision tree or flow chart for our team. As such, we have simplified our approach to any member of our team that feels they have a concern about the wellbeing of their workforce or colleagues to 'if in doubt, shout'. This ensures that a Director takes personal accountability for resolving the concerns about modern slavery, with relevant support from external partners as appropriate.

Corporate Governance

We have increased our Board of Directors to include key stakeholders including our Commercial Director and Operations Director. These individuals are integral to our business and hold key relationships with our larger customers. This helps to ensure that our corporate strategy is communicated clearly, as well as increasing our accountability for ensuring our business has a robust and structured corporate governance plan.

We are increasing our usage of appraisals to introduce formal KPI's in a variety of areas focussed on our employee wellbeing. This will help to integrate our ethos and strategic approach to modern slavery into more elements of our business, ensuring it is a day-to-day focus for our team and not forgotten.

Compliance

The team that faces our temporary workers are regularly trained on our policies and procedures in relation to modern slavery, with refresher training delivered to all personnel in November 2020.

Regular refresher training and spot checks are completed to ensure ongoing awareness. Quarterly appraisals, regular seminars, external training, online training and additional communication all help to ensure our staff remain aware, diligent and empowered to challenge any concerns.

Our head office team remain impartial from any Account Manager, reporting directly into the Financial Controller. Additional verification helps to reduce our risks further. We have invested in our CRM system to ensure we can prevent duplicate records, bank details and other information from being entered.

Regular due-diligence reports are circulated to ensure we continue to monitor information. This is reviewed weekly and in monthly board meetings by the leadership team.



4. Assessing, managing and mitigating risk

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High risk sectors

ALS supply temporary workers to sectors that are deemed to be high risk and targeted by gangs looking to infiltrate an organisation with victims of modern slavery. A substantial number of recent prosecutions and cases have involved warehouse and waste management facilities as well as recruitment agencies.

We recognise that the nature of the roles and the workforce typically used in these sectors means we are more likely to be targeted and therefore need to remain diligent. As such, we need to raise our standards to ensure we are not a 'soft target' by utilising a three-pronged approach:

Customer awareness

Increasing our customer awareness of the risks of modern slavery will help ensure we work collaboratively with them throughout our tenure. Completing joint assessments of the risk, concerns and methods of infiltration of the labour force. Completing collective welfare checks on the workforce and encouraging random dip-sampling and checking on the entire process of the candidate journey with ALS. Joint training sessions will also help encourage dialogue, shared learning and engagement on the topic.

Candidate awareness

We recognise that many victims do not recognise that they are indeed the victim of modern slavery or human trafficking, so we intend to increase our engagement with the workforce with specific 'Spot the Signs' campaigns and demystifying the language around modern slavery through simple, easy to understand and engaging literature, training and communication on our sites. Specific helplines for workers to report welfare concerns about their colleagues will be established so they can also support with identifying potential victims.

Employee awareness

We have increased our team by over 40% during 2020 and as such have a renewed focus on ensuring our recruiters and Account Managers ask open questions and understand the reason 'why' we do certain things the way we do them. We also ensure they understand the implications of modern slavery and our approach to tackling it will help guarantee our culture remains consistent as we continue to grow.

To increase awareness, we have continued to utilise:

- Bespoke posters in multiple languages
- Confidential whistleblower hotline
- External audits from Slave Free Alliance and other organisations
- Toolbox Talks, seminars and training for all staff
- Digital learning content
- Unannounced and random auditing

Fulfilment at peak

We need to encourage our team to engage with our customers early regarding peak fulfilment periods as a vital element of our modern slavery strategy. The effect of Brexit on the availability of temporary workers has been softened by the increased unemployment from the Covid-19 pandemic, however we still feel it is more likely than not that our team may feel pressured to 'fill shifts' during peak periods by whatever means necessary, which leaves us susceptible to the risks of modern slavery.

During peak periods, our auditing regime will be increased to ensure we minimise this risk for our own business. In addition, targeted poster campaigns, proactive worker engagement and surveys will be launched on customer sites to raise awareness of modern slavery and encourage reporting of welfare concerns.

Modern slavery awareness forms part of our broader strategy on empowering our people, ensuring we maintain our ethics and standards, promoting equality and fairness in all that we do. We need to continue to do more to maintain control, structure and discipline in all facets of our business to remain at the forefront of reducing the risk of modern slavery.

Supply chain

Recruitment agencies

We utilise a small number of recruitment agencies to support our business on national contracts. These partner agencies are vetted prior to usage and we have robust procedures for adding new suppliers to our panel. We will increase the level of auditing we complete on our supply chain of recruitment agencies to every six months (from annually) but also ensure that all workers they supply are transacted via our platform for us to complete additional checks directly with the workforce.

Workers, irrelevant of supplier, will be included in modern slavery workshops we complete with customers and will have the opportunity to reach out to ALS and 3rd party confidential whistleblowing helplines.

We set high expectations of our own business and ensure we cascade this same standard to all of our suppliers. We extend our control measures and knowledge to our supply chain to help further reduce the risks of modern slavery and protect our customers and workers. Suppliers are verified, credit checked and audited to ensure compliance at regular intervals. Suppliers who are unable to demonstrate continued competency in this area are removed from our estate and black-marked against future usage.

Personal Protective Equipment

Our PPE is sourced through a Welsh-based, locally owned supplier to ensure we can control an area of our business where we feel there is an inherent and well publicised risk. We recognise that our PPE supplier source products from overseas, including the Far East, and will increase our modern slavery checks to include the secondary level of their supply chain where possible. We have regular dialogue with the senior management team at our PPE supplier to ensure they are aware of the risks of modern slavery and complete a variety of diligence checks on their supply chain.



5. Training and development

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As part of our plans for 2020-21, we committed to participating in collaborative assessments and seminars with Slave Free Alliance, standing alongside our customers to complete gap analysis, training and workshops. These have been completed and will be extended into 2021 alongside our own internal training and development.

Internal training

We have a programme of internal training including:

- Online learning course on modern slavery for all staff and temporary workers
- Slave Free Alliance training for both line managers and frontline colleagues
- Tier 2 line managers are specifically targeted under agreed KPI's on completing spot checks, audits and interviews with the temporary workforce

We have identified a need to upskill our team to ask more 'open questions' when completing welfare interviews with the workforce, ensuring that we observe body language, tone and any other signs to identify potential victims.

External training

We have engaged with Slave Free Alliance and completed a programme of gap analysis, seminars and webinars. These will be expanded in 2021 to include more of our customers attending alongside ALS colleagues to increase their awareness.



6. Tracking our progress

In 2020, we committed to a series of actions to improve our awareness, policies and procedures in incorporating a broader approach to tackling modern slavery. Our Board of Directors have updated our progress on these actions and outlined a series of actions for 2021-22.

Action	Progress	Next Steps
We will improve the communication we provide to customers prior to supplying them with temporary labour, ensuring they mirror our standards on modern slavery and provide suitable welfare facilities for the workforce.	Customers audited by a Director prior to supplying labour, including checks of welfare facilities and customer policies and procedures. Modern slavery statement (where applicable) reviewed.	Formally document the review by a Director and file on CRM system.
We will improve the literature and posters we display around customer sites, ensuring we provide independent advice and hotlines for workers to report concerns.	New suite of posters designed in line with corporate branding and published on all sites in prominent locations. Confidential helplines rolled out.	More discreet communication aimed at workers who may not identify as a victim of slavery to allow for simple welfare reporting.
We will regularly review our progress in all areas with customers and share transparently our findings, objectives, and goals.	Quarterly review meeting with a Director present with all customers. Modern slavery now a specific item discussed as part of formal agenda.	Specifically link modern slavery and welfare checks to contractual KPI's with customers.
We will create champions in areas such as modern slavery, gender equality and protecting vulnerable groups to ensure these remain at the forefront of our strategic vision.	ALS taskforce appointed to include Account Managers, Regional Operations Managers and Board of Directors. Quarterly workshops on key areas to ensure continued focus.	Regional taskforce to include a sample of temporary workers to provide a representative voice. Increase involvement within our own team by expanding taskforce by 3 x members in 2021.
We will be transparent with customers where we utilise a broader supply chain and ensure they maintain similar standards of compliance and diligence.	Full supply chain mapping in place with specific T&C's. Customers receive transparent invoicing outlining supplier, margin and management fee from ALS on a weekly basis.	None required.

We will work with our suppliers who source goods from overseas, ensuring we map potential risks and aim to reduce our exposure to these, even if it means an increased cost to us.	PPE supplier engaged about the level of diligence they complete on their supply chain.	Expand coverage of modern slavery policies to include secondary, high risk suppliers in Far East where possible.
We will integrate increased communication on modern slavery into our induction and onboarding procedures and review this information on a quarterly basis.	Specific content added to all inductions on modern slavery. eLearning course created and completed by all ALS staff.	Simplify messaging on modern slavery to cover: Zero tolerance for anyone suspected of controlling a worker. Simple signs to help identify a victim.
We will engage customers on modern slavery to ensure they are aware of their risks.	Seminars and gap analysis completed with 2 x larger customers. All customers engaged about modern slavery and their own obligations.	Increase gap analysis to 3 x customers by 2021.
We will encourage customers to participate in external seminars, including Slave Free Alliance workshops alongside ALS.	Customers have attended Slave Free Alliance webinars and training sessions with ALS in 2020.	Encourage customers to join Slave Free Alliance independently of ALS and attend workshops and collaborative sessions with ALS.

7. Plans for 2021

In addition to our next steps to carry forward our initiatives from 2020, we have also introduced the following measures:

- Modern slavery taskforce to dip-sample candidate registration packs and welfare interviews, not from their own team members, to increase our impartial view on the candidate onboarding and management processes of each site.
- Specifically link modern slavery to internal KPI's on performance, ensuring these form part of a quarterly appraisal and financial incentives for our team.
- Improve and standardise new starter training for new frontline recruiters and managers to ensure they are aware of the signs of modern slavery, confident in engaging with workers and able to identify potential concerns.
- Targeted campaigns on 'Spot the Signs' to be aimed at specific customers during peak trading periods to reinforce our messaging and ensure we raise awareness during a potentially vulnerable time.
- A quarterly, minuted modern slavery taskforce meeting to ensure continuous improvement and accountability for delivering our campaigns and initiatives, whilst also ensuring our corporate culture remains strong as our team continues to grow.

**This Modern Slavery Statement
has been approved by the Board
of Directors and signed by Steve
Lanigan, Chief Executive Officer
on 25/02/2021.**

