

# Modern Slavery Statement 2023

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# 1.Introduction

March 2023

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**Our progress report for 2022 comes amidst the backdrop of a global Covid-19 pandemic, substantial changes to the UK employment market, migration shifts and the impact of Brexit now being truly felt in the UK. Now more than ever we need to remain vigilant to the risks of modern slavery as organised gangs invariably change their approach to exploiting and abusing labour and the vulnerability of victims increases.**

People are the principle focus of our organisation, our culture and values remain resolute and will continue to be engrained in our organisation as we continue to grow.

Our values are clear:

- We listen
- We care
- We solve problems
- We are approachable
- We challenge

We supply sectors that are high risk for exploitation, human trafficking and modern slavery. We remain abreast of the latest intelligence and regularly attend workshops, seminars and training sessions to ensure our knowledge remains current and that we continuously improve our processes, procedures and practices as the threat of modern slavery evolves.

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.

Our ability to adapt and move forwards in challenging market conditions has helped us to continue to grow and thrive in a challenging recruitment environment. As our team expands, our risk also increases so we are proportionately increasing our in-house compliance checks, audits and inspections whilst also increasing the training our team receive to ensure they remain vigilant.

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.

We have expanded our literature and campaigns deployed on sites and aimed specifically at our workforce, who may not realise that they are at risk or indeed being exploited, ensuring they feel empowered to raise concerns about their wellbeing.

We have increased our collaboration with our customers and worked in partnership to tackle modern slavery. We will ensure we learn from the large companies in the industries we serve, taking inspiration from their initiatives, goals and objectives to work towards a collective goal of eradicating slavery. Where we successfully rescue victims of slavery or prevent risk to our workers, we are committed to talking openly with our customers, suppliers and colleagues about this to help raise awareness.

To that end, we have also spoken at two industry seminars to ensure we remove the stigma and talk openly about our key learnings and experience to ensure a collaborative approach to reducing Modern Slavery. We continue to work closely 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.



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 of PPE supplier with foreign-based secondary or tertiary suppliers (see Risk Profile in Section 4).

We continue to work closely 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.

On top of previous initiatives, our poster campaigns, social media posts, eLearning packages, bespoke training from Slave Free Alliance, worker booklets, PPE campaigns and other initiatives continue to ensure our culture is clear. We will be responsible, ethical and transparent and we will protect our workers above all else.

Further, the heightened risks of exploitation as a result of Covid-19, the current financial crisis, migration and the turmoil in Eastern Europe remain in our minds and are a clear focus.

**We have continued to push the boundaries and engage publicly on Modern Slavery in all its forms, and we're keen to continue to learn so we can stay at the forefront of the fight against Modern Slavery and broader exploitation in all its forms.**



## 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. Following our growth in 2021-22, we have consolidated and enhanced our internal training to ensure all staff mirror our corporate behaviours and expectations.

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. Our Regional Operations Managers have largely been promoted from within, ensuring career progression but also stability and consistency within our team. 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 grown our central compliance resources 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.

The Covid-19 pandemic, the current financial crisis, the war in Ukraine and the migrant crisis are all factors we need to consider that exacerbate our risk of Modern Slavery and increase the vulnerability of our workforce. We need to remain conscious of these and other factors and adapt our internal practices to ensure we reduce the risk of exploitation.

As our middle layers of management grow, our culture remains integral to all that we do. We need to ensure that our culture remains one of openness, fairness and equality, promoting the wellbeing of our colleagues, workers and customers at every opportunity. An increased focus on training for new starters is part of our objectives for 2023 to ensure we recognise that as our team grows, our risk also grows.

In addition, in June 2021 we obtained a licence to allow us to supply sectors regulated by the Gangmasters and Labour Abuse Authority (GLAA). We feel this is a reflection that our policies and procedures are robust. However, as we supply sectors such as food manufacturing, we also recognise the role of the GLAA in those sectors and remain vigilant of the risks of modern slavery.



### 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.

We continue to complete audits on all suppliers in 2022 including a programme of personal inspections on our suppliers, including unannounced audits to ensure their practices remained in line with our expectations.

We have further consolidated our supply chain to ensure we maintain close relationships with trusted partners who reflect our brand values and corporate behaviours.

#### 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
- A staff handbook

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.

In addition, proactive interviews with our workforce, held impartially to the Account Manager for that location have helped us to uncover potential welfare issues with our workforce.

### Corporate Governance

We have increased our Board of Directors to five Directors on Companies House. These individuals are integral to our business and hold key relationships with our larger customers. We have deliberately maintained a lean structure to our business, ensuring that a Director remains accountable for all customer interactions and maintains proximity to our customers to identify any areas for concern.

We increased our deployment of One-to-Ones, appraisals and a company wide incentive plan, with specific measures on compliance, modern slavery and worker wellbeing to ensure this is a clear discussion point during all formal interactions with our team.

### Compliance

The team that faces our temporary workers are regularly trained on our policies and procedures in relation to modern slavery, using industry experience alongside our own experiences to share relatable, relevant and realistic scenarios for our learnings.

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, these are reviewed weekly.

## 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 have increased 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 and proactive welfare interviews are regularly conducted by an impartial member of the ALS team.

### Employee awareness

We have increased our team by over 40% since 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 in 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

We recognise that we work in hard-to-fill sectors and therefore we ensure regular engagement with our customers on the challenges of recruitment.

The effect of Brexit on the availability of temporary workers, alongside retirees and the change of roles through Covid-19 have made this one of the most difficult times in recruitment. Regular and structured dialogue with customers, working in partnership to adjust operations to ensure the best possible service in the circumstances has ensured we remain successful. Our customers recognise the challenges with recruitment and our best relationships are built on trust, a collaborative approach based on mutual respect, transparency and accountability.

During peak periods, our compliance team increase proactive audits to ensure we minimise this risk for our own business. In addition, targeted poster campaigns, worker engagement and surveys have been 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.**

#### **Covid 19**

Covid has inevitably changed behaviours in social settings for the foreseeable future and we need to be conscious this can mask behaviours typically seen as red flags for Modern Slavery. Heightened awareness and increased engagement with workers will help to ensure suitable opportunities to complete welfare checks and identify potential risks.

#### **Financial Crisis**

We're in a difficult financial crisis, with energy costs and broader inflationary pressures creating a perfect storm for those who are vulnerable to exploitation. We recognise that financial incentives maybe offered to our team to engage with traffickers or gangs, and as such we have increased our processes to independently check on the welfare of our workers and shared addresses, bank details etc.

Further, we regularly engage with our customers to ensure pay rates to the workforce remain competitive, ensuring we provide the best possible opportunity for the workforce to earn a fair wage.

#### **Supply chain**

##### ***Recruitment agencies***

We utilise a small and selective 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 have increased the level of auditing we complete on our supply chain of recruitment agencies to every six months (from every year) 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, are included in modern slavery workshops we complete with customers and can 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. Due diligence

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We complete regular and proactive welfare checks with our workers as part of our modern slavery due diligence. This helps to raise awareness to our staff, provides a deterrent to potential gangs and provides an opportunity for early intervention in cases where we have concerns for the wellbeing of a colleague or worker.

These due diligence checks are completed by a senior member from our team, not directly involved in the running of the relevant contract, ensuring an impartial view to encourage dialogue from the workforce, whilst also protecting our business in the scenario of a 'good egg, gone bad' scenario, based on intelligence on cases involving other recruitment agencies.

Additional due diligence checks are completed with workers, either selected at random or based on system generated 'flags'. Flags could include shared bank account details, shared addresses or similar. These are often legitimate (student housing, cohabiting partners etc) but are seen as potential signs of victims of slavery slavery.

Through this methodology, we successfully recovered a victim of modern slavery in January 2021, and this has garnered our efforts to look to recover more victims through increased engagement and awareness.

Further, we have worked in partnership with Cory to ensure a positive legacy from this case, where both Cory and ALS Directors have attended industry seminars to talk openly about our experience, the challenges we faced and the lessons we have learnt through this experience to ensure the broader industry awareness increases.

In addition, we continue to learn from others and engaging with the wider industry. We have sought membership of the Modern Slavery Information Network to share intelligence, ensuring a more holistic view on areas of concern and potential risks of exploitation.

We ensured that we made a positive legacy from our victim, in spite of the obvious emotional and traumatic events associated with the case. We have ensured that internally, our colleague who provided a trusted forum for the victim to make their disclosure has been praised and celebrated for her actions and caring nature.

This behaviour will be championed above all else

Externally, we have talked openly about our case, the diligence we perform and we have strengthened this diligence further through both increased engagement with the workforce, but also the ability for anonymous reporting. We also look to learn from best practice and tighten our own due diligence methods as a result of that experience.

We continue to work proactively with Slave Free Alliance, increasing our engagement and creating bespoke training materials for our team to ensure we understand the potential risks and perform dynamic and proportionate checks on our workforce.

We have also taken the feedback from the gap analysis regularly performed by Slave Free Alliance and taken that forward to other customers, engaging earlier during any competitive tender process to understand their current policies and procedures and ensure they are aligned to our own. This has proven successful and ultimately supports our approach to responsible recruitment.

We have increased the questions we ask during welfare interviews, ensuring these reflect the latest insights and intelligence. Importantly, we recognised the skills needed to ask open questions, to leave pauses, to show empathy and compassion and to provide an environment for someone experiencing this level of oppression and threat to their wellbeing to disclose. We recognise that these soft skills are integral to achieving a positive outcome, and as such we intent to strengthen this training to our team so our due diligence checks are not just seen as a 'tick box' exercise.

## 6. Training and development

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We made several commitments to increase our training over the last 2 years and have a specific focus on the soft skills element for 2023 and beyond. Our team find external sessions insightful, emotionally challenging and thought provoking.

### 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
- Increased training on soft skills, interview techniques and emotional intelligence.

We continue to upskill our team, particularly as our middle management team expands, to ensure we are open, transparent, vigilant and challenging and continue to live to our principles, values and ethics. Additional training, created by Slave Free Alliance and aimed at the sectors we serve forms part of our objectives.

### External training

We have engaged with Slave Free Alliance and completed a programme of gap analysis, seminars and webinars. We are looking to expand this training to include more immersive learning experiences to help further engage our team in 2023.



## 7. Tracking our progress

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In 2022, we committed to a series of actions to improve our awareness, policies and procedures in incorporating a broader approach to tackling modern slavery. Progress on those actions is outlined below:

Action	Progress	Next Steps
Increased system reporting on red flags, with a change of the frequency of reports from monthly to weekly.	Weekly reports now issued and system checks automatically completed. Increased focus on shared addresses and results of welfare checks recorded on candidate record on our CRM.	Identify whether some system checks can be automated.
Increase awareness within our workforce of the signs of a victim, helping to promote to our workforce to raise any wellbeing concerns about a colleague on an anonymous basis.	Red flags now in open spaces on customer sites, encouraging more of a focus on wellbeing and worker engagement. Anonymous reporting available but can be increased.	Improve confidential whistleblower access.
Increase audits of our supply chain to include second tier suppliers.	Consolidated supply chain during 2022, with an increased audit frequency of 6 monthly from annually.	
Refresh our worker-focussed campaigns, ensuring they are aware of 'what a victim could look like', the 'signs of trafficking' and similar messaging.	Increased communication to include a leaflet guide, posters, eLearning, bite-sized content in induction packs.	Integrate modern slavery awareness content into induction pack across all customers.
Expand the coverage and customer base involved in our gap analysis, raising awareness of the support from Slave Free Alliance and the benefits of them also joining.	Some of our customers have also joined SFA during 2022. Larger customers also offered gap analysis and integrated this within contractual obligations.	Futher expand the reach of this offering.
A PPE campaign with branded messages on hi-visibility vests used on our customer sites to raise awareness.	Pilot rolled out, to be expanded in 2023.	Expand PPE campaigns in 2023 to cover more customer sites.

## 8. Our campaigns

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### Posters

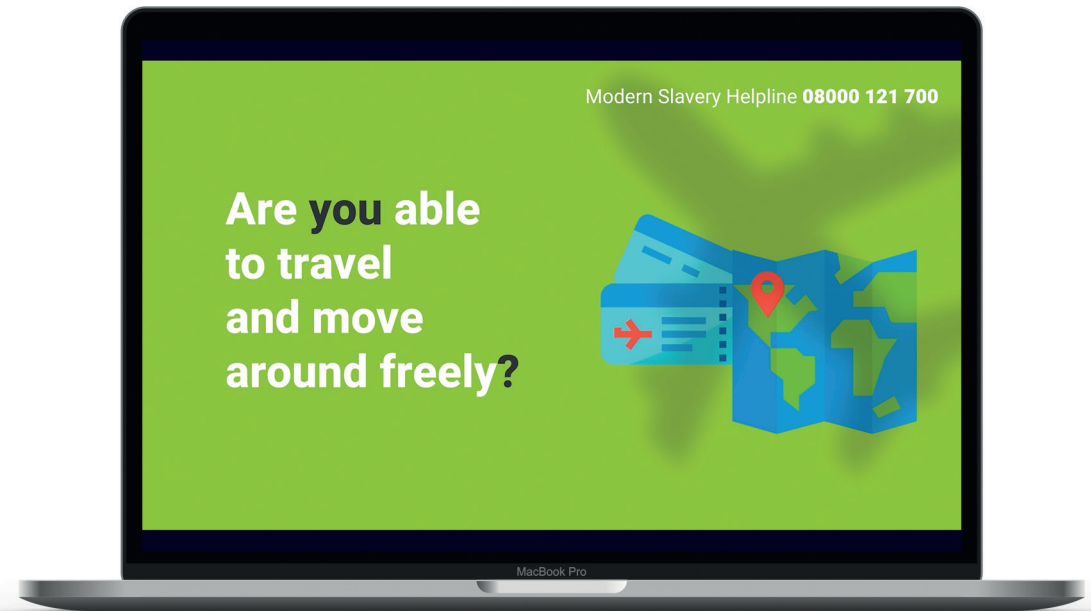
Our activity to help abolish modern slavery extends beyond educating our management teams and permanent employees. We have also created bespoke communications campaigns including eLearning videos, posters and booklets focused on supporting potential victims of modern slavery to recognise the signs of forced labour and exploitation and to reach out and seek help.

These posters are positioned in areas where they are most likely to be viewed by temporary workers such as on the back of toilet doors and in canteen areas. They feature information, advice and confidential helpline numbers for anyone with concerns.



### eLearning

These eLearning videos are short, easy to understand and can be accessed either on a mobile phone or laptop. They are aimed at helping potential victims recognise the signs of slavery and exploitation with clear messaging and the modern slavery helpline number featured throughout.



### Booklets

This pocket-sized modern slavery booklet was designed specifically for anyone to be able to quickly slip it into a pocket or bag. The booklet features information to help workers spot the signs to recognise whether they are at risk of or currently a victim of modern slavery and exploitation. There is advice for anyone with concerns detailed throughout the booklet including confidential helpline numbers.



## 9. Plans for 2023

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We want to continue to challenge ourselves to be better, more proactive and ultimately help reduce the risks of modern slavery to our own business, our customers, our workers and our industries. To help further this, we have also committed to the following in 2023:

- Expand our gap analysis from SFA to include further customer locations.
- PPE campaign to be expanded to further sites
- Integrate modern slavery materials into induction pack across all sites
- Improve access to confidential whistleblower helpline
- Increase system-generated compliance checks to help target welfare interviews and checks
- Rollout a more interactive and immersive learning experience to our sites, raising awareness of the red flags and subtle methods of exploitation.



**This Modern Slavery Statement  
has been approved by the Board  
of Directors and signed by Steve  
Lanigan, Chief Executive Officer  
on 05/04/2023.**

