

# Modern Day Slavery Statement

## PURPOSE OF THIS STATEMENT

**Modern slavery is a global and international crime affecting millions of people worldwide, including many victims within the UK. Men, women and children of all ages and backgrounds are victims of human trafficking, forced labour, domestic servitude or debt bondage.**

**This document sets out the policy of Gi Recruitment Ltd, TACK TMI UK Ltd, Marks Sattin (UK) Ltd and INTOO (UK) Ltd with respect to preventing opportunities for modern slavery to occur both within its own and its supply chain's daily business activities. This fulfils our obligation under section 54 of the Modern Slavery Act 2015.**

## BUSINESS OPERATIONS

The Gi Group is one of the world's leading companies providing services to the development of the labour market. The group is active in the fields of temporary, permanent and professional staffing, search and selection, executive search, outsourcing, training, outplacement and HR consulting.

The UK brands that this statement applies to are Gi Recruitment Ltd (incorporating Draefern Ltd, Gi Group Recruitment Ltd, Excel Resourcing (Recruitment Consultants) Ltd, Grafton Professional Staffing Ltd), TACK TMI UK Ltd, Marks Sattin (UK) Ltd and INTOO (UK) Ltd.

## RESPONSIBILITY FOR THIS STATEMENT

Ultimate responsibility for the implementation of this statement rests with the Executive Management Team (EMT) and the Training, Compliance and Human Resources Departments of the company.

This statement covers the financial year January to December 2020.

## RISK ASSESSMENT PROCESS

During quarter 1 of 2021 Gi Group completed an annual modern slavery risk analysis. This included an annual completion of the Stronger Together Good Practice Implementation Checklist, updating the Modern Slavery Risk Register, conducting a Worker Survey, high risk location risk-assessments and completion of an annual report. Activities are giving a risk rating based on risk scores relating to the likelihood of a breach, severity of impact of a breach, and central controls in place. The process confirmed the following specific areas of risk in relation to our day to day business activities:-

- Internal employees (temp or perm) working directly with a Gangmaster (GSTR) out of choice or necessity
- Existing temporary workers acting as a liaison between ourselves and a GSTR
- Client employees acting as a liaison between ourselves and a GSTR
- Second tier supplier knowingly working with a GSTR
- Second tier supplier unknowingly working with a GSTR – no supplier control
- Key supplier knowingly sourcing goods with slavery in the supply chain
- Key supplier unknowingly sourcing goods with slavery in the supply chain – no supplier control
- Suppliers sourcing goods from high risk countries
- Suppliers providing goods and services at rock bottom prices
- Suppliers utilising agencies themselves or within their primary supply chain

With regards to the supply of temporary and permanent staff Gi Group have focused attention on 24 customers who present the highest risk. These companies have been selected by using specific criteria which highlighted particular risks, such as, volume and frequency of the staff supplied, the location of the company's site and the nationalities of the temporary and permanent candidates that are being supplied.

## PREVENTION

Taking the key areas of risk into account, we aim to prevent opportunities for occurrences of modern slavery by focusing on 3 business activities:

1. Development of policy/codes of practice
2. Raising awareness
3. Effective process implementation/consistent checking and auditing

## POLICY/CODES OF PRACTICE

The Gi Group key policies and codes of practice which relate to the prevention of modern slavery are:

- Gi Global Code of Ethics
- Ethical Recruitment Policy
- Preventing Hidden Labour Exploitation Policy
- Anti-bribery Policy
- Public Interest Disclosure Policy
- ETI Base Code
- Stronger Together Initiative Code of Conduct
- Second Tier Supplier Agreements

## RAISING AWARENESS

### *Permanent Employees*

Gi Group operational permanent employees are made aware of the Gi Group policies and internal process relating to the prevention of modern slavery as part of the core operations training programme. Classroom and on the job training is supported by specific online modules and substantial guidance and reference material which can be located on GiNET. During 2020 we delivered training to 101 employees.

Gi Group commitment as a Stronger Together Business Partner along with our active participation as members of the Association of Labour Providers, the Recruitment and Employment Confederation and the GLAA Labour Provider/User Group open up essential communication channels which enable us to provide a consistent flow of up to date information and support tools.

Strong central control supports the operational network and therefore the Head Office team are clear about the standard checks and subsequent reports that they need to make and produce which

may in turn lead to the identification of potential issues.

### *Temporary Workforce*

No fee or cost of recruitment will be charged to the Gi Group temporary workers.

Initial awareness is raised by playing the Stronger Together video as part of the recruitment process. Additional Stronger Together resources, including advisory posters and leaflets, are placed in prominent positions within all of our locations; and the internal audit process ensures consistent delivery in this.

A temporary worker's welfare also forms an essential part of the initial interview process and then the ongoing relationship that Gi Group has with them. Workers are encouraged to report any concerns that they have at any time during their relationship with Gi Group, including confidential issues.

Gi Group also provides formal communication channels via worker interviews during the internal audit process (59 interviews in 2020), central satisfaction surveys and the Gi Group modern slavery helpline.

Worker Surveys are to be carried out every 6 months, the first of which was completed in February 2021. Questions covered arrangements for obtaining work, transport to work, payment of wages, living arrangements, RTW document availability and knowledge of Stronger Together initiatives. 3998 completed responses were received (20% response rate), and key findings were:

- 88% of respondents state that they do not rely on someone else for transport. 1% of respondents state they get to work via either minibus or in a vehicle with someone they don't know
- 98% of respondents are paid into their own bank account. 0.6% of respondents have their wages paid into a friend or other non-family members account, 12 of whom have worked for Gi Group for more than 6 months
- 65% of the respondents live in rented accommodation. 3.1% of respondents state that they live in rented accommodation and their landlord is employed by Gi Group

- 1.6% of respondents (65 of 3998) state they are not currently in possession of their RTW docs, although most of these state it is due to the documents being submitted to as part of visa application
- 70% of respondents state they have an excellent or good understanding of Stronger Together initiative, and 12% state they have poor knowledge
- 38% of respondents wish to receive further Stronger Together information via email.

A follow-up survey improvement action plan, which includes specific follow-up with some workers, is due to be implemented by 30/04/21.

The Gi Group time and attendance systems safeguard against worker substitution. Processes are in place to identify duplicate bank accounts, home addresses, NI numbers, landlord and next of kin details to support the quarterly monitoring carried out by the compliance team; and concerns are escalated where necessary.

### **Suppliers**

Gi Group have placed suppliers into two categories:

- **Category 1:** second tier suppliers who supply temporary workers to our operational locations
- **Category 2:** those who supply general goods and services to Head Office and the operational network

**Category 1:** Gi Group consider second tier suppliers of temporary staff to be a higher risk as they will face the same key issues as we do ourselves. Prior to being approved, all potential suppliers are issued with the Supplier Code of Conduct, complete the standard Supplier Questionnaire (which from Q2 2020 includes a Modern Slavery section), and sign a Supplier Agreement. Where required they will undergo an audit of their internal process prior to supplying temporary staff. Depending on the frequency of the supply, second tier agencies will also be subject to audits from our internal team. The aim of the audit is to ensure that a second tier supplier is implementing the commitments detailed within the Gi Group.

Policy statement. As part of the audit Gi Group use the Stronger Together Good Practice Implementation checklist to benchmark the current process that each supplier has in place and this will also support the suggestions for actions that can be taken to make improvements to what they already have in place.

**Category 2:** operating predominantly as a service provider, the range of goods and services that Gi Group purchase is relatively limited, however this does not mean that we underestimate the opportunities for occurrences of modern slavery from within our supply chain. Gi Group maintain an approved supplier list, and beginning with the key supplier, risk assessment is to be completed upon renewal / review of supplier arrangements. Once complete, a supplier risk profile is updated with any specific issues being raised on a supplier by supplier basis.

### **EFFECTIVE PROCESS IMPLEMENTATION AND CONSISTENT CHECKS AND AUDITING**

Establishing policy and procedures and raising awareness by delivering training and establishing effective communication channels creates the framework for the prevention of modern slavery and is a natural starting point.

Consistently checking that the theory is being implemented practically on a daily basis establishes the current effectiveness of the framework and will also identify improvements which can be made. All operational locations have the initial responsibility for ensuring that all of the key processes are implemented and that the relevant checks are taking place. The Gi Group central audit team carries out the following audits during the course of a trading year, in relation to the prevention of modern slavery:

- Pre-arranged operational location audits (including temporary worker interviews)
- Pre-arranged audits of live recruitment and induction sessions
- Spot check operational location audits
- Spot check remote operational audits (including RTW) Spot check remote audits of effective use of relevant IT equipment
- Pre-arranged Head Office-specific right to work in the UK audits
- Temporary worker complaint audits
- Second tier/supplier audits

The Gi Group temporary worker management systems enable us to take regular snapshots of the diversity of the nationalities that we currently have working at all operational locations. This enables Gi Group to identify any unusual patterns or concerns relating to nationalities which may pose the highest risk.

We believe that the activities which have taken place during 2020 have been an improvement on those that were previously in place. Improvements include the introduction of a formal quarterly duplicate bank account, home address, and NI number check and report.

A strong active relationship with ALP and GLAA has been maintained in 2020 / 2021, with Gi Group representation in the GLAA compliance process / strategy consultation, GLAA Labour Provider and Labour User Liaison Group meetings, and a Labour

User / Labour Provider and Worker / NGO Liaison Group.

During 2020 Gi Group are aiming to work more closely with both our highest risk customers, second tier suppliers and the enforcement authorities to ensure that strategies and activities become more aligned.

Results of the above are collated and reviewed by the Executive Management Team and subsequently are made available to all internal employees. The Managing Director Corporate Accounts has the direct responsibility for reviewing/evaluating any central reports with a view to identifying, communicating and addressing any potential areas of concern both internally and with the relevant external authority when it is necessary to do so.

**KPIs**

The main KPI / targets performance in 2020 is outlined below:

KPI & Action	Target	Result?
<b>Identifying and addressing MDS concerns:</b> Creation and management of a nonconformity tracker, a more robust monthly bank / address / next of kin / landlord details, and re-introduction of candidate surveys	Identification and closure of a minimum of 2 investigations per quarter	Achieved
	Increase the volume of worker interviews by 10%, which will always include second tier workers where relevant	Reduced by 33% - Not achieved due to Covid-19 restrictions
<b>Training &amp; Awareness:</b> Quarterly training review and follow up	Minimum of 90% of Gi Group operational permanent employees completing the online training	Achieved
<b>Audit:</b> Completion of internal and supplier audits at high risk locations	Internally identify and audit a minimum of 3 high risk sites AND a minimum of 2 high risk suppliers	Not achieved due to Covid-19 restrictions
<b>Compliance:</b> Overall MDS process and controls	Improve the Gi Group score in the Stronger Together Implementation Checklist by at least 5%	Achieved 20% improvement in average score per question (1.44 from 1.15 in 2020) – overall % remained the same (78%) following change to checklist

The main KPI / targets set for 2021 as part of the annual improvement plan are:

KPI & Action	Target	Responsibility
<b>Identifying and addressing MDS concerns:</b> Maintain a nonconformity tracker, completion of quarterly bank / address / NI checks, and worker surveys	Identification and closure of a minimum of 1 investigation per quarter	Compliance Dept / Ops Employees
	Increase the volume of worker interviews by 5%, which will always include second tier workers where relevant (59 completed in 2020)	Compliance Dept
<b>Training &amp; Awareness:</b> Quarterly ops staff training review, improvement of online module and ops manual content, and increases provision of information to candidates	Improve the incident investigation and people-centered safeguarding process within the online training and ops manual using Stronger Together resources (Investigation Checklist, Workplace Critical Issue Reports and Remediation Records)	Compliance Dept
	Increase the % of high risk locations who always provide Stronger Together leaflets and show video during induction by 5% (83% in Q1 2021)	
	Increase the % workers who state their Stronger Together initiative knowledge is good / excellent (70% in Q1 2021)	
<b>Client co-operation:</b> Improve the coordinated MDS activities conducted with clients	Increase the % risk locations who have put a structured MDS plan in place (62% in Q1 2021)	Compliance Dept / Ops Employees
<b>Suppliers:</b> Improve supplier MDS compliance through annual Supplier Questionnaire review / audit	Ensure a min of 50% of second tier agency suppliers are Stronger Together business partners	Compliance Dept / Ops Employees
<b>Compliance:</b> Overall MDS process and controls	Improve the Gi Group score in the Stronger Together Good Practice Implementation Checklist by at least 5%	Compliance Dept / Ops Employees

## REVIEW

Following its initial introduction, this Modern Day Slavery Statement will be reviewed by the Executive Management Team at least annually and may be reviewed from time to time.

**This Policy is approved by the board of directors**

Signed: Paulo Canoa – CEO, 31 March 2021

