

## INDUCTION PROGRAMME

### **MODERN SLAVERY POLICY & STATEMENT**

#### **MODERN SLAVERY POLICY**

1. Shepherd Stubbs Ltd is committed to eliminating modern slavery, human trafficking, forced labour, and similar human rights abuses.
2. The Company is committed to ensuring that its staff and any workers it supplies (directly or indirectly) are not subject to behaviour or threats that may amount to modern slavery, human trafficking, forced labour, and similar human rights abuses.
3. The Company provides appropriate training and awareness information for all of its staff who 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.
4. Any staff, workers or other parties are strongly encouraged to report any concerns or suspicions that they might have to the Operations Managers or Company Directors.
5. Reports surrounding these issues are taken extremely seriously by the Management Team and Directors, who are committed to ensuring that all investigations are prompt and effective. If our investigations reveal any issues, we are committed to taking appropriate action, including but not limited to:
  - a. Working with the appropriate organisations to improve standards,
  - b. Removing that organisation from our preferred supplier list,
  - c. Passing details to appropriate law enforcement bodies.
6. We regularly monitor our risks in this area via a regular review of our supplier list, partner organisations (see also Modern Slavery Statement Section 1.2) and other employment agencies where we offer or receive 2<sup>nd</sup> tier supply of staff to client organisations. In addition, we regularly review our active client list (through our ISO 9001 Quality Management System) to ensure we only deal with ethical organisations.
7. As part of our efforts in this area, we publish our modern slavery statement on our website.
8. This policy is reviewed and updated on a regular basis.

#### **MODERN SLAVERY STATEMENT**

This statement is made as part of Shepherd Stubbs Ltd's commitment to eliminating the exploitation of people under the Modern Slavery Act 2015 (the Act). It summarises how the Company operates, the policies and processes in place to minimise the possibility of any problems, any risks we have identified and how we monitor them, and how we inform our staff.

##### 1. **Our Business**

Shepherd Stubbs is a limited company and independent business operating in the recruitment sector. We supply temporary and permanent staff via our search, selection and introduction services across most commercial, professional and light industrial sectors.

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#### 1.1. Who we work with

All of the hirers that we work with, and all of the work-seekers we provide, are known to and identified by our staff. All of the temporary workers we supply are identified by our staff. The majority of our work-seekers are supplied by us direct to the hiring company but some of our work-seekers are supplied via other recruitment businesses who we are working in partnership, who facilitate providing them to the eventual hiring company.

#### 1.2. Other relationships

As part of our business, we also work with the following organisations:

- the Recruitment and Employment Confederation ([www.rec.uk.com](http://www.rec.uk.com))
- the Gangmasters and Labour Abuse Authority (GLAA)

#### 2. **Our Policies**

Shepherd Stubbs Ltd has a Modern Slavery Policy which is published on the Company's website ([www.shepherdstubbs.com](http://www.shepherdstubbs.com)) In addition, the business has the following other policies which incorporate ethical standards for our teams and our client and candidate customers:

- Customer Service Policy
- Equality & Diversity Policy
- Anti-Bribery & Corruption Policy
- Environmental Policy
- Alcohol & Drugs Policy

#### 2.1. Policy Development and Review

Shepherd Stubbs' policies are developed by our directors, based on advice from industry best practice (including HR), legal advice and in consultation with senior managers. We review our policies on a regular basis or as needed to adapt to changes.

#### 3. **Our Processes for Managing Risk**

In order to assess the risk of modern slavery, we use the following processes with our suppliers:

- When engaging with suppliers, we undertake an assessment of their processes and policies including their approach to modern slavery, human trafficking, forced labour, human rights and whistle-blowing.
- We audit our supplier list annually (or more frequently if information comes to light) as part of our ISO9001 Quality Management System.

After due consideration, we have not identified any significant risks of modern slavery, forced labour, or human trafficking in our supply chain. However, we continue to be alert to the potential for problems.

Additionally, we have taken the following steps to minimise the possibility of any problems:

- We reserve the right to conduct spot-checks of the businesses who supply us, in order to investigate any complaints.

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- We require the businesses we work with to address modern slavery concerns in their policies and the manner in which they do business and treat their employees via their working procedures and where relevant to publish a modern slavery statement.
- Only senior members of staff who have undergone appropriate training for assessing modern slavery risks in the supply chain are authorised to sign contracts and establish commercial relationships in any area where we have identified the potential for risk.
- We follow REC ethical guidelines and work with the GLAA in order to combat the risk of modern slavery and human trafficking.

Our teams are encouraged to bring any concerns they have to the attention of their manager and/or the directors.

#### 4. **Our Performance**

As part of monitoring the performance of Shepherd Stubbs Ltd, the directors and managers undertake the following audit processes in respect of Modern Slavery:

- Ongoing assessments as part of ISO 9000 procedures into the working practices of organisations that we supply
- An assessment of prospective client's practices and reputation prior to the introduction of our recruitment services to that organisation
- A regular review of our current supplier list

#### 5. **Our Training**

All of our team receive Induction Training and on-going awareness-raising information to keep them up to date and so that any concerns or questions can be highlighted and the appropriate actions implemented as necessary. Staff are encouraged to raise any concerns about modern slavery and other wider human rights issues at any time.

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