

Modern Slavery Policy Statement

Introduction to Modern Slavery

Modern slavery can take many forms, including the trafficking of people, forced labour, servitude and slavery. Any consent victims have given to their treatment will be irrelevant where they have been coerced, deceived or provided with payment or benefit to achieve that consent.

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

Modern Slavery Statistics



Our Business

Founded in 1997 in North Wales, we have grown and developed our business within the UK to offer nationwide coverage across seven major regions through high-street branches, specialist divisions and onsite managed solutions. gap personnel group are recognised as the 4th largest independent industrial labour provider in the UK, supplying temporary, contract and permanent workers to companies across multiple sectors.

In 2014 we expanded our operation outside of the UK, opening offices in France and Dubai. In 2016 we secured our presence in Europe by opening two branches in Poland, and acquiring another in Slovakia. In 2017, gap personnel are focusing on cultivating our brand internationally with new branch openings in Australia.

The sectors believed to be most affected by slavery and human trafficking are construction, agriculture, textile, security, and food processing and packaging, constituting much of gap personnel's core business. As a UK leading industrial recruiter operating within these key sectors, gap personnel realise that we are in at the front line of the recruitment process and our position is key to raising awareness of modern slavery and tackling the problem of hidden labour exploitation. gap personnel is committed to developing and adopting a proactive approach to tackling hidden labour exploitation.

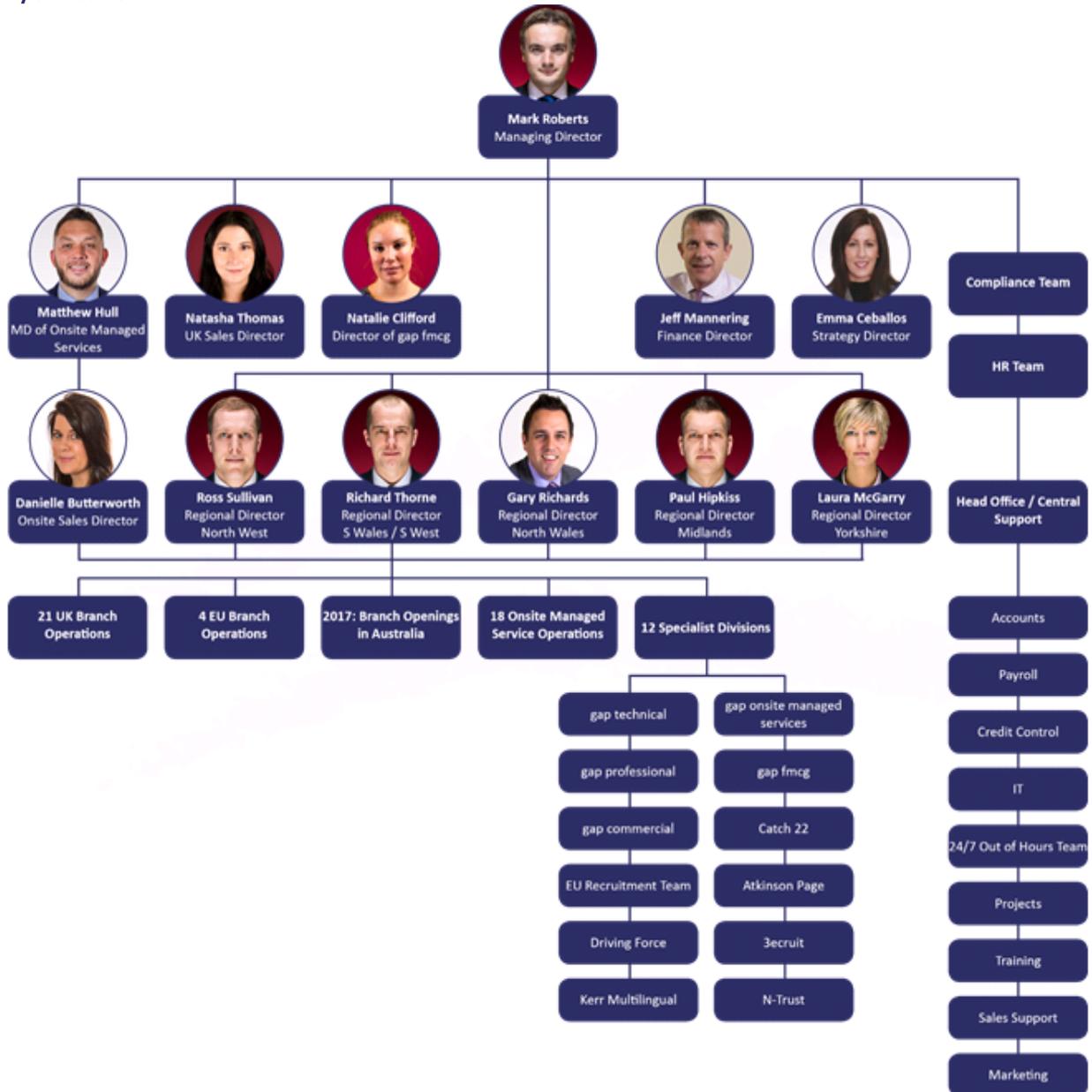
Our clients range from market-leading multinationals through to SMEs and start-ups. All of our clients, work seekers, and temporary workers, are known to, and identified by our staff during the client on boarding and candidate registration process as applicable.

At the time this statement was prepared, gap personnel's annual turnover is in excess of £120 Million.

This policy is applicable to all offices and operations within the gap personnel group.



Company Structure



Memberships, Associations and Credentials

In recognition of the responsibility of gap personnel to our clients, candidates, employees and contractors, it is a fundamental value of gap personnel that all of its business and other practices be conducted at all times in compliance with all applicable laws and regulations of the countries in which it operates, its officiating bodies and associations. This is demonstrated through our long-standing relationships with the following organisations:

- The Recruitment and Employment Confederation
- The Association of Labour Providers
- The Association of Recruitment Consultancies
- GLA Licence Holder
- Business Partner of Stronger Together



Our Policies

gap personnel's Modern Slavery policy is available on our website at <http://www.gap-personnel.com/slavery-and-human-trafficking/>

In addition, gap personnel have the following policies which incorporate ethical standards for our staff, clients and our suppliers:

- [Ethical Trading Policy](#)
- [Bribery and Corruption Policy](#)
- [Whistleblowing Policy](#)
- [HR Policy on Preventing Slavery, Human Trafficking and Hidden Labour Exploitation](#)

gap personnel's policies are established by our Compliance Team, HR Department, Directors and Senior Leadership Team. Based on advice from HR professionals, industry best practice, legal partners, and in consultation with REC, ALP, Stronger Together. We review our policies annually or as needed to adapt to changes.

Managing Risk

We understand that conducting thorough practices and applying due diligence in advance of any engagements we enter into, whether they be with clients, applicants or third party suppliers, is critical to managing the risk of modern slavery and hidden labour exploitation occurring within our business and / or our supply chains.

All external business partners, affiliations and suppliers of gap personnel are expected to familiarise themselves with our Modern Slavery Statement and associated policies and commitments, and operate themselves in a manner which supports our methodology and vision of eliminating the exploitation of people under the Modern Slavery Act 2015 and ensuring this does not occur within our supply chain.

Due diligence – Suppliers

Irrelevant of our suppliers own policy or process in relation to modern slavery the following due diligence is conducted by gap personnel with all suppliers whether they be suppliers of goods and services or 2nd Tier suppliers of labour provision.

[Due diligence – Suppliers](#)

Due diligence – Applicants

As a front-line recruitment agency, we acknowledge that we are in an ideal position to not only increase applicants' awareness and understanding of modern slavery, but to ensure through detailed practices that we can identify early on within our recruitment process any potential victims, and reduce the exposure of our business to instances of modern slavery. Please click the link to access our "Applicant On boarding Process" detailing the measures and procedures in place within our recruitment process.

[Due diligence – Applicants – On boarding process](#)

Due diligence – Workers

The safety and welfare of our workers is paramount to our business principles, as such, the below processes and practices have been designed, developed and implemented with the intention of ensuring our workers' safety and welfare following placement with gap personnel and our clients. Please click the link to access our "Worker On boarding Process" detailing the measures and processes in place to effectively manage and monitor the exposure of our workers once placed.

[Due diligence – Workers – On boarding process](#)

Training



In our commitment to identifying any potential slavery, forced labour or human trafficking, and ultimately Preventing Labour Exploitation from occurring within our operation, we have sourced, developed and undertake the following training programmes.

Internal Training

- All permanent employees are required to attend our Corporate Induction which includes a dedicated session on Stronger Together / GLA / Modern Slavery, and how the key principles are to be applied within our operation.
- Upon completing the Corporate Induction, all employees are asked to commit to preventing labour exploitation by signing and agreeing to the Recruiter Compliance Principles document provided by Stronger Together.
- All internal training courses are informally refreshed and updated as required to ensure the content remains current.

The aims of internal training are to:

- Ensure that all staff responsible for directly recruiting workers are aware of issues around third party labour exploitation and signs to look for and have signed appropriate Recruitment Compliance Principles.
- Ensure that labour sourcing, recruitment and worker placement processes are under the control of trusted and competent staff members.
- Adopt a proactive approach to reporting suspicions of hidden worker exploitation to the GLA, Gangmasters Licensing Authority (soon to be GLAA) and police.

External Training

- Our Compliance Team members that specialise in Social and Ethical Compliance have attended “Tackling Modern Slavery in Global Supply Chains” and “Tackling Modern Slavery in UK Businesses” organised by Stronger Together.
- Regular attendance to ALP and Stronger Together Roadshows and/or Webinars.
- External training is sourced and attended as required based on individual staff needs.

The aims of the external training are to:

- Ensure that our Compliance Team are up to date with current industry guidance and best practice processes so that they may effectively support our operational teams with situations that may arise.
- To identify new methods and processes that can be implemented into our business, ensuring a proactive approach to tackling modern slavery within our organisation and that of our supply chain.

2016 Performance against Modern Slavery Objectives

As a result of our concerted efforts, training and strengthened processes at registration and interview stages of our recruitment process, throughout 2016, gap personnel teams have identified and reported multiple cases suspected to relate to slavery, human trafficking and forced labour.

				
<i>Reported 2 potential cases to the GLA</i>	<i>Reported 1 potential case to the Modern Slavery Helpline</i>	<i>Reported 2 potential cases to the local police</i>	<i>Assisted Human Trafficking Teams with investigations into 3 cases of forced labour</i>	<i>Removed 1 supplier from our PSL</i>

Responsibility





Local representatives have been appointed in the form of our Branch and Onsite Managers. Our managers are trained and tasked with the responsibility of upholding the aims of our Modern Slavery Statement, associated policies and commitments as an approved Business Partner of Stronger Together at a local level, thus enabling the early identification of potential victims of modern slavery.

Responsibility to ensure the policy commitments are upheld, including training, updates and auditing, lies with gap personnel's Compliance Team, with overall responsibility lying with Mark Roberts, gap personnel's Managing Director.

Overview

As a responsible corporate business, gap personnel aim to act in a socially responsible manner at all times by respecting the economic, social, cultural, political and civil rights of those employed through our business, and by complying with Human Rights legislation and the Modern Slavery Act 2015.

Since the publication of our 2016/2017 Modern Slavery Statement, the gap personnel Compliance Team have built in a number of processes to their training, systems, audits and standard business practices which have strengthened our operational understanding, awareness and process relating to modern slavery. Additionally, they have developed links with various external bodies and government authorities to ensure industry issues including illegal working prevention and labour exploitation are effectively managed and escalated where required.

We are proud upon publication of our 2017/2018 statement to be able to demonstrate the effectiveness of the processes we have introduced into our business in relation to tackling modern slavery, human trafficking and forced labour exploitation. The successful identification of 3 significant cases of potential exploitation reinforces the dedication and commitment of our teams to tackling modern slavery.

As a business, we are committed to continuous improvement and strive to identify new methods, processes and practices that can be incorporated into our business operations, ensuring the health, safety and welfare of our workforce.

Mark Roberts
Managing Director

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