



# Modern Slavery and Human Trafficking Policy

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## Policy Statement

PeoplePlus has zero tolerance to slavery, human trafficking and hidden labour exploitation and is committed to ensuring that there is no modern slavery, human trafficking or hidden labour exploitation in any part of our business.

This Modern Slavery Policy is the principal articulation of the PeoplePlus stance against slavery, human trafficking and hidden labour exploitation. It is intended to inform and influence all the operational procedures within the organisation.

Our stated Modern Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure (amongst our other priorities) that slavery, human trafficking and hidden labour exploitation are not taking place anywhere in our business or related supply chains.

We are proud of the conditions of employment for all our employees throughout PeoplePlus. Given the nature of our business, our senior management board considers that there is minimal risk approximating that, either within PeoplePlus or through our supply chains supporting our business activities, that are in any way involved in or even tangentially supportive of, or complicit in slavery and human trafficking. The employment and procurement practices operated by the businesses within PeoplePlus ensure that we are rightly viewed as an excellent and supportive employer. And to the extent that our organisation operates as a purchaser of goods or services we expect a high level of ethical conduct from those businesses with which we do business within our supply chain.

## Modern Slavery and Human Trafficking Statement

In addition to this policy, PeoplePlus also publish a Modern Slavery and Human Trafficking Statement. The Statement is updated on an annual basis to reflect our position against slavery and details the steps to tackle modern slavery taken by the business and our supply chain.

## Hidden Labour Exploitation – what is it?

Hidden labour exploitation is one of the end results of human trafficking in the UK.

It is the exploitation of applicants or workers by third party individuals, gangs or any other party to that of the employer or the labour provider. This can also include rogue individuals working within these businesses without the knowledge of the companies' management.

Hidden labour exploitation and human trafficking for labour exploitation includes payment for work finding services and work-related exploitation such as forced use of accommodation, the forced taking of identification documentations as well as personal bank details. It is understood that these actions are often well hidden by the perpetrators. It is often that the victims themselves are reluctant and frightened to come forward stating that they are a victim of this unnecessary crime.



## Organisation Structure

PeoplePlus is an employment support and training services company helping people transform their lives and businesses through work, training, education and financial services. We help people move into work by enabling them to gain the skills they need to make them employable, providing them with real work experience or helping them onto a traineeship or apprenticeship. We do this as a prime provider on behalf of the Department for Work and Pensions, the Education & Skills Funding Agency, European Social Fund and as part of our work with the Scottish and Welsh governments amongst others. We also work with employers who we can offer a personalised recruitment and training solution for their business; we manage the whole process from vacancy profiling to candidate sourcing, vetting and selection.

## Our Supply Chain

Our supply chain enables us to help more people into work. Our partners are established public and private sector organisations that help us to deliver and maintain high quality job coaching, recruitment and skills development services. The aim of our partnerships is to join forces and expertise in offering a service that can seamlessly fit the needs and requirements of jobseekers, employers and skills learners alike. We work with a variety of established partners who are committed to the same high standards. This is validated through our due diligence processes and for those organisations that meet the threshold of obligations under section 54 (1) of the Modern Slavery Act 2015 we will support our partners to understand those obligations and statutory duties.

## Continual Development and Our Commitments:

- PeoplePlus are committed to working in conjunction with our parent company (Staffline) to fight modern slavery and human trafficking; together we have a great deal of experience and work collaboratively with all of our clients and anti-slavery networks across the UK to share ideas and intelligence to work together to help eradicate modern slavery.
- PeoplePlus will ensure that any recruitment staff or similar will be suitably trained and understand the risks and recognise any issues regarding modern slavery, hidden labour exploitation and modern slavery.
- As an organisation we understand that tackling modern slavery is an ongoing effort; we will regularly monitor and review our supply chain and practices and action accordingly to ensure we adapt and improve as appropriate to mitigate any risk of modern slavery or human trafficking at PeoplePlus.
- PeoplePlus will adopt a proactive approach to reporting any suspicions of modern slavery, human trafficking or hidden labour exploitation to all relevant external authorities, including the Police, Gangmasters Labour Abuse Authority, etc. as appropriate.
- PeoplePlus will require all organisations in our supply chain to acknowledge and understand the risks and issues regarding modern slavery, human trafficking and hidden labour exploitation and adopt their own policies and procedures that are consistent with our approach.



## Due Diligence and Implementation Processes

As part of our initiative to identify and mitigate risk (including in relation to that of human trafficking and slavery) we operate a range of policies and procedures appropriate to the different sectors of PeoplePlus. These include the policies and procedures in the following areas:

- Anti-Bribery and Corruption Policy
- Anti-Money Laundering Policy
- Supply Chain Design
- Supply Chain Review
- Consultancy Policy
- Whistle-blowing Policy
- Recruitment Policy
- Safeguarding Policy
- Equality and Diversity Policy

PeoplePlus also articulates a series of employee rights and benefits available to employees during the employee Inductions and Welcome Events and individual contracts of employment for each member of staff.

PeoplePlus operates an HR department led by the HR Director and a Governance department led by the Governance Director. Each of the Company's Directors and the Managing Director have reviewed and agreed to the terms of our Anti-Slavery statement. Each of these departments has reporting responsibilities to the Senior Management Board. A combination of procedures and functions operates to help identify, assess and monitor potential risk areas in our supply chains and mitigate the risk of slavery and human trafficking occurring in our supply chain.

### Policy Review

PeoplePlus reserves the right to amend this policy as and when required (as a minimum it will be formally reviewed on an annual basis).



## Applicability

This policy applies to all employees of PeoplePlus and any volunteers and anyone working on behalf of PeoplePlus.

## Equality and Diversity

At PeoplePlus we do not tolerate any discrimination, harassment, bullying or victimisation of our employees, volunteers or customers.

Please see the **Equality and Diversity Policy** for further guidance

## Associated Policies and Documents

- Recruitment Policy
- Modern Slavery and Human Trafficking Statement
- Anti-Bullying and Anti-Harassment Policy
- Equality and Diversity Policy
- Safeguarding Policy
- Prevent - Anti-Radicalisation and Extremism Policy
- Whistleblowing Policy
- Grievance Procedure
- Disciplinary Procedure
- Procedure for Managing Allegations of Abuse Against Employees and Volunteers at PeoplePlus
- Code of Conduct
- Health & Safety Policy
- Data Protection Policy
- Company Privacy Notice
- IT Governance Policy
- Policies specific to external sites/establishments/contracts

## Associated Legislation

- Children Act 1989, 2004
- Children (Scotland) Act 1995, 2007, 2016
- Children and Young People (Scotland) Act 2014
- Childcare Act 2006
- Limitation (Childhood Abuse) (Scotland) Act 2017
- Education Act 2002, 2011
- Education and Skills Act 2008
- Safeguarding Vulnerable Groups Act 2006
- Sexual Offences Act 2003
- Sexual Offences (Scotland) Act 2009
- Mental Capacity Act 2005



- Modern Slavery Act 2015
- The Equality Act 2010
- Immigration, Asylum and Nationality Act 2006
- The Human Rights Act 1998
- Police Act 1997 Part V
- Criminal Justice & Court Services Act 2000
- The Care Act 2014
- Working Together to Safeguard Children 2018
- Counter Terrorism Act 2015
- General Data Protection Regulations (GDPR)
- Data Protection Act 2018
- Social Services and Wellbeing (Wales) Act 2014
- Working Together to Safeguard People (Welsh Govt) 2017
- The Protection of Children Act 1999
- Criminal Justice and Court Services Act 2000
- Working Together to Safeguard Children, 2015
- Keeping Children Safe in Education, 2020
- Well-being of Future Generations (Wales) Act 2015
- Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015
- All-Wales Child Protection Procedures
- Protection of Vulnerable Groups (Scotland) Act 2007
- Apprenticeships, Skills, Children and Learning Act 2009
- Protection of Freedoms Act 2012
- Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 as amended

*If you would like any of our policies in any other format such as another language, Braille or large print, or if you have a question about the policy, please email [policies@peopleplus.co.uk](mailto:policies@peopleplus.co.uk) for assistance*

