

# MODERN SLAVERY STATEMENT

## April 2017/18

In accordance with the Modern Slavery Act 2015, this statement has been published to outline the measures First Call Contract Services has taken during the year ending 5<sup>th</sup> April 2018, to prevent modern slavery and human trafficking in its business and the supply chain in which it operates.

### Introduction

First Call Contract Services understand that global migration has given rise to the increasing issue of human trafficking which often encompasses slavery, servitude and forced labour (Modern Slavery). This is a global issue that requires a global response. Every business or industry sector is at risk of being tainted and therefore First Call Contract Services operate a zero tolerance policy within our business and encourage all employees and temporary colleagues to come forward and report any concerns or suspected case of abuse to our management teams, who will act upon them.

### Our Organisation

We are a generalist labour provider, supplying temporary industrial colleagues and drivers from 13 office locations and 11 On-Sites around London; the south east and the midlands. Ranked 42<sup>nd</sup> overall in the Recruiter Top 100 and 39<sup>th</sup> in their productivity growth table in 2017, we supply a large number of temporary workers each week with an annual turnover of £72 million (2017). We are a GLA License holder and a proportion of our business encompasses labour provision into the food and horticultural sector supply chains. We work in close partnership with our clients to ensure ethical standards are maintained.

### Responsibility

All Initiatives, policies and procedures are primarily sanctioned by the Board of Directors prior to implementation by our Compliance Director. Once implemented, our Compliance Director delivers any necessary employee training as required. All initiatives, policies and procedures are continually reviewed to monitor their effectiveness and the results are discussed at Board level. Any changes/amendments are then agreed and implemented by the Compliance Director. Should the need arise, our Compliance Director will conduct preliminary investigations and escalate to the relevant body if applicable.

### Company Policies

First Call Contract Services internal policies include our [Ethical Trading Policy Statement](#) which affirms our commitment to ensuring that our workers are treated fairly and that their basic human rights are respected. Any allegations of abuse will be taken very seriously and dealt with accordingly. We also operate a [Whistleblowing Policy](#) which is primarily aimed at our permanent employees but is also available to our

temporary workers through their Handbook and encourages staff to report any malpractice or ethical violations including cases of Modern Slavery. First Call Contract Services will fully investigate all reported incidents and take the appropriate remedial action. We are business partners of the Stronger Together initiative and have implemented a HR Policy on [Preventing Hidden Labour Exploitation](#) which further upholds our dedication and commitment to dispel any possibility of exploitation from infiltrating our business and to stamp out Modern Slavery from the supply chain.

### Due Diligence and Compliance Modern Slavery Risk Assessment

This Modern Slavery Statement has been drafted by the Compliance Director and agreed by the Board of Directors prior to being published.

We understand that as a labour provider the risk of human trafficking and exploitation of our workers from external sources is high. Through Stronger Together, we have established a set of Alert Flags to highlight potential cases of exploitation within our branches and onsite locations. We have also set in place a specific interview question template which is used during colleague registrations in an attempt to identify likely case of trafficking and exploitation at an early stage.

**First Call Contract Services have implemented a comprehensive auditing regime. All branches and on-site contracts are audited on a regular basis and the following point are covered:**

- Registration Process (Form Completion)
- Right to Work
- Work History
- Multiple Occupancy of Addresses
- Multiple Use of Bank Accounts
- Multiple Use of Phone Numbers
- Multiple Use of Email Addresses
- Payroll (Timesheets; Payslips)
- Worker Interviews/Workshops
- Manager and Consultant Discussions
- ETI Base Code

**All internal audit results are presented to the Board of Directors.**

**We are audited regularly by our clients and furthermore, contribute to our clients own supply chain audits.**

Should non-conformances be identified, corrective actions are issued and preventative measures will be put in place. However, evidence of Modern Slavery will be investigated and reported to the relevant bodies.

### **Training**

All permanent employees undergo an extensive training programme which is completed within their first month of commencing their employment with the company. Subjects covered include GLA Licensing Standards; Right to Work; Modern Slavery and Ethical Trading. Training is delivered by our Compliance Director who has an extensive knowledge in these fields and has received training on 'Investigating Modern Slavery' from the GLA Academy, University of Derby. Our training programme is continually reviewed and updated as required. Refresher training is delivered to all employees as required. Modern Slavery is discussed with our temporary workers during the registration process and the Stronger Together information video is shown to workers during their site induction.

### **Further Steps to Prevent Modern Slavery in our Business**

First Call Contract Services advocate an open book policy with our clients to ensure full transparency of recruitment and business practices is maintained. Our industry experience together with our passion for education and training enables us to incessantly drive our clients and staff awareness of Modern Slavery and protect the basic human rights of vulnerable people. First Call Contract Services undertake to continually review and improve their processes and procedures in a concerted effort to ensure that exploitation does not take place in our business.

**This Modern Slavery Statement has been approved by the Board of Directors**

*David Segust*

David Segust  
Compliance Director

1<sup>st</sup> April 2018