

# MODERN SLAVERY STATEMENT

## April 2018/19

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 2019, to prevent modern slavery and human trafficking in our business and the supply chains in which we operate.

### 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 which 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 offices and 11 On Sites locations. We supply a large number of temporary workers each week with an annual turnover of £76 million (2018). We are a GLAA License holder and a proportion of our business encompasses labour provision into the food and horticultural sector supply chains. We forge close partnerships 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 Team 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 Team. Should the need arise, our Compliance Team 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

Violation's including cases of Modern Slavery. 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 our 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 by the Compliance Team the ALP's Complyer Audit tool and the following points 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.

Branch Managers conduct a monthly compliance check of their own branches, looking for multiple use of addresses, phone numbers, email addresses and other indicators of exploitation. In addition, the Compliance Team check bank accounts for multiple use. Should non-conformances be identified, corrective actions are issued and preventative measures will be put in place. However, evidence of Modern Slavery is investigated and reported to the relevant bodies.

### Measuring Effectiveness

Year	Cases Identified	Cases Resolved	Under Investigation	Investigative Body
2018	2	1	1	GLAA
2017	1	1	0	GLAA

First Call Contract Services have recently assisted the GLAA in relation to external exploitation cases, which have occurred in close proximity to one of our branch locations. Through working closely with the GLAA, we have identified the names of several individuals in the area who are known to control and exploit vulnerable people. This has enabled us to implement extra measures in an attempt to limit the risk of those exploiters infiltrating our business.

### Training

All permanent employees undergo an extensive training programme when commencing their employment with the company. Subjects covered include GLAA 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 GLAA Academy, University of Derby. Our training programme is continually reviewed and updated as required, with refresher training delivered to all employees. 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 inductions.

### 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 client 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. In a concerted effort to spread awareness, First Call Contract Services install TV Screens in office waiting areas which continually scroll Modern Slavery and Anti-Exploitation information videos'.

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

*David Segust*

David Segust  
Compliance Director

15<sup>th</sup> April 2019