

## **Modern Slavery & Human Trafficking Policy Statement – 1<sup>st</sup> February 2023**

Imperial Recruitment Group Ltd (IRG) Company Reg. 12368795 comprises of the following companies:

Imperial Workforce Ltd Company Reg. 10724663 GLAA Reg. IMPE0002 ICO Reg.

Imperial Professionals Ltd Company Reg. 10175951 ICO Reg.

Imperial Drivers Ltd Company Reg. 12446072 ICO Reg.

### **Introduction**

Modern slavery and Human Trafficking; the exploitation of job applicants or workers by third party individuals or gangs other than the client. It includes forced labour and human trafficking for labour exploitation; payment for work finding services and work related exploitation such as forced use of accommodation. Imperial Recruitment Group recognise that all businesses have a responsibility to ensure that modern slavery and human trafficking is not taking place in their businesses or supply chains.

### **About us**

The Imperial Recruitment Group operates as an employment business and employment agency, predominantly sourcing and supplying both skilled and unskilled staff for the food manufacturing/production and FMCG sectors. The nature of our business is such that we deal with temporary and often a transient workforce, who could be susceptible. We recognise this and are committed to developing and adopting a proactive approach to tackling Modern Slavery and human trafficking within our business and in so far as reasonably practicable, within our supply chain. The Imperial Recruitment Group has an annual turnover in excess of £10 million.

### **Supply Chain**

As a staffing provider, all temporary staff who register with The Imperial Recruitment Group for temporary work are interviewed personally by a member of our team and their identification and right to work in the UK documentation is inspected and photocopied. In order to protect the integrity of our processes, we do not sub contract provision of our labour supply.

As workers and prospective employees are directly sourced by Imperial Workforce our link in any supply chain is as a supplier – any supply chain into The Imperial Recruitment Group is incidental, e.g. the purchase of office supplies.

### **Our Policy on Slavery and Human Trafficking**

We are committed to ensuring that we take all reasonable steps to ensure that there is no modern slavery or human trafficking within our business.

Our Policies on Tackling Hidden Labour Exploitation reflect our commitment to acting with integrity and ensuring that our systems and controls are effective in identifying any potential risks in relation to modern slavery and human trafficking.

### **Due Diligence**

- Our contracts with clients reflect the principles within our Ethical procurement policy.
- All prospective new workers are interviewed in person, with questions specifically targeted to try and identify whether they are subject to any form of modern slavery
- We operate a policy of workers only being able to have their wages paid into a bank account that is in their name (individual or joint). We have systems in place to monitor

duplicate occurrences of bank accounts and multiple uses of the same home address so that we can investigate any concerns.

- All staff responsible for recruiting and sourcing workers are trained and required to sign up to a set of recruiter compliance principles that govern their methods of recruiting new staff.
- Imperial Recruitment Group are accredited business partners of Stronger Together and the Association of Labour providers (ALP) maintaining the high standards of operation required to meet the business partner requirements.
- Leaflets and posters on tackling hidden labour exploitation are displayed in all office locations and on client sites (where permitted).
- A confidential helpline is in operation for workers and employees to report any concerns they may have in relation to modern slavery.
- The Imperial Recruitment Group carry out regular unannounced audits of our own office and onsite locations to ensure that our high standards, policies and procedures are being met. We are also subject to numerous client and independent audits that include interviews with randomly selected workers that help us to detect any issues in relation to modern slavery.
- Where Imperial Recruitment Group have supplier agreements in place for office supplies and sundries, wherever possible we utilise trusted local companies with whom we have long standing relationships.

### **Training**

All workers joining the business to work on client sites are provided with an induction that includes information on sources of help should they, or their colleagues/friends be concerned about modern slavery.

All employees working in The Imperial Recruitment Group offices receive an induction that educates them about modern slavery and spotting the potential signs of modern slavery. All staff who are responsible for recruiting workers receive additional training in relation to our Recruiter Principles and are required to adhere to our code of practice. On an ongoing basis, responsibility lies with named Senior Managers to ensure that training and our understanding of the issues involved in modern slavery are kept up to date.

### **Safeguards**

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. The Company will accept and take seriously concerns communicated anonymously. However, retention of anonymity does render investigations and validation more difficult and can make the process less effective. Individuals are therefore encouraged to put their names to allegations.

Any claims or allegations made which are found to be malicious or vexatious will result in disciplinary action being taken against the individual.

## Communication and awareness of this policy

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

## Review

Following its initial adoption, this Anti-Slavery and Human Trafficking Policy will be reviewed by the Group's Board of Directors on a regular basis (at least annually) and may be amended from time to time.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes The Imperial Recruitment Group slavery and human trafficking statement for the financial year 2022/23.

Jason D'Silva  
Managing Director (IW Ltd)

