

MODERN SLAVERY STATEMENT

April 2019/20

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 6th April 2020, 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

First Call Contract Services have been trading for over 23 years and are experienced in the provision of recruitment solutions to a wide and diverse client base from a network of offices and on-site locations. The business is financially secure and has been profitable every year since incorporation growing year on year with an annual Turnover (in excess of £80M 2020). Recognised as the 8th largest supplier within the Industrial / Logistics sector, supplying circa 6,000 workers daily, we are accredited to the highest industry standards, a GLAA License Holder, Stronger Together Business Partners 2020, ISO 9001 and recognised in a number of industry publications, one of only 36 to be listed by the London Stock Exchange '1000 Companies to Inspire Britain', Our Senior Directors sit on the GLAA labour user / labour provider liaison and the Association of Labour Providers Executive Committee. We take pride in forging close partnerships with our clients to consistently improve measures and 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 aimed at both our permanent employees and our temporary workers.

Through their Handbook staff are encouraged to report any malpractice or ethical violations 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.

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.

Modern Slavery Training (Current Employees)	
Employee Groups	Numbers Reached
Management Team	19
Sales Team	6
Service Team	34
Onsite Team	14
Admin Team	9

New Employees Captured (Year on Year)		
2017	2018	2019
32	14	24

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.

First Call Contract Services have identified that the main risks of exploitation affecting our business is from external individuals and or organised gangs introducing workers both in person or anonymously. This often incorporates the controlling of bank accounts, the finances of the victims.

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 cases of trafficking and/or exploitation at an early stage. The Compliance Director conducts an annual review of our Modern Slavery Prevention processes to ensure that they remain fit for purpose. An action plan is then formed from the results and improvements are made where necessary.

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 are put in place. However, if evidence of Modern Slavery is found, it is then investigated and reported to the relevant bodies.

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 Complier 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.

Measuring Effectiveness

Year	Cases Identified	Cases Resolved	Under Investigation	Investigative Body
2019	4	3	1	Police
2018	2	2	0	GLAA
2017	1	1	0	GLAA

First Call Contract Services have assisted the GLAA and the police in relation to external exploitation cases, which have occurred in close proximity to our branch locations.

Through working closely with the GLAA and the police, we were able identify the names of several individuals in the area who are known to control and exploit vulnerable people. This has enabled us to implement additional measures to detect, prevent and disrupt modern slavery in our business.

In October 2019, First Call Contract Services become members Central Intelligence Network, a working group of leading labour provider business and labour users. The aim of the group is to share intelligence, support each other, share best practise ideas and tips and promote a more collaborative approach from the industry.

Governance, Partnerships and Collaborations

We recognise the crucial role of partnerships in tackling Modern Slavery. In the past year, we have continued, or built partnerships with the following organisations:

- Gangmaster and Labour Abuse Authority (GLAA)
- Stronger Together
- Sedex Member
- Central Intelligence Network
- Association of Labour Providers Member (ALP)
- Herts Constabulary – Serious Organised Crime Group

Next Steps

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.

We will continue to:

- Identify Modern Slavery risks in our business and review processes and procedures
- Spread awareness amongst our temporary workforce
- Train employees to raise awareness of our Corporate responsibility
- Review internal training processes
- Strengthen our network industry intelligence
- Integrate any learning from Covid-19 into our future strategy
- Identify and use opportunities for collaboration to verify and help resolve risk issues
- Improve whistleblowing facilities

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

David Segust

David Segust
Compliance Director

April 2020

