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Authorised by: Board of Directors

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# Modern Slavery Statement

## April 2023-24

*David Segust*  
David Segust  
Compliance Director

# Preface

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 6<sup>th</sup> April 2024, to prevent modern slavery and human trafficking.

# 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. First Call Contract Services operate a zero-tolerance policy within our organisation 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 27 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 £90m (2023).

Recognised as the 8th largest supplier within the Industrial / Logistics sector, supplying circa 3,500 workers daily, we are accredited to the highest industry standards, a GLAA License Holder, Verified Advanced Stronger Together Business Partner, and recognised in a number of industry publications, listed as 63rd in the Recruiter Hot 100.

Our Directors sit on the GLAA labour user / labour provider liaison group 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 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.

If Modern Slavery is identified our Compliance Team will conduct preliminary investigations and work collaboratively with investigative bodies to disrupt the exploitation activities and protect victims.

# Company Policies

First Call Contract Services internal policies include our **Responsible Recruitment Policy; Tackling Modern Slavery and Hidden Labour Exploitation Policy** and an **Ethical Trading Policy** which ensure that our workers are treated fairly and that their basic human rights are respected. Any allegations of abuse are taken very seriously and dealt with in line with these policies. A **Whistleblowing Policy** is also established which is aimed at both our permanent employees and our temporary colleagues.

Employees and temporary colleagues are encouraged to report any malpractice or ethical violations including cases of Modern Slavery through the various internal reporting mechanisms available.

First Call Contract Services is signed up to the Responsible Recruitment Toolkit (RRT) and continually strive to develop and improve systems 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; Prevention of Illegal Working; 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 with refresher training delivered to all employees on a bi-annual basis. Modern Slavery risks are discussed with our temporary workers during the registration process and the Stronger Together information video is shown to workers.

# Training Delivery

## Modern Slavery Training (Current Employees)

| Employee Groups | Numbers Reached |
|-----------------|-----------------|
| Management Team | 33              |
| Sales Team      | 10              |
| Service Team    | 42              |
| Onsite Team     | 14              |
| Admin Team      | 16              |
| Vetting Team    | 5               |

## New Employees Captured (Year on Year)

| 2019 | 2020 | 2021 | 2022 |
|------|------|------|------|
| 24   | 33   | 29   | 39   |

## Refresher Training (Year on Year)

| 2023 | 2024 | 2025 | 2026 |
|------|------|------|------|
| 24   | 33   | TBC  | TBC  |



# Due Diligence & Compliance

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 and anonymously. This often incorporates the controlling of bank accounts and the finances of the victims.

Through the Stronger Together Initiative, 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 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. Independent assessments are conducted by Stronger Together every three years to monitor the company's progress in relation to the implementation of measures to prevent modern slavery. First Call Contract Services have recruited a Modern Slavery Champion who supports the Compliance Team in delivering the organisations Modern Slavery prevention and awareness program.

# Due Diligence & Compliance

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 using 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 client's 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 are put in place. However, if evidence of Modern Slavery is found, it is then investigated by the Compliance Team and reported to the relevant investigative and enforcement bodies.

Our organisation also an Advanced Business Partner of the Responsible Recruitment Toolkit (RRT), which further demonstrates our commitment to ethical, fair and lawful recruitment which respects and protects workers rights throughout recruitment, work and post-termination.

# Measuring Effectiveness

First Call Contract Services continue to work in collaboration with the GLAA and the Police to provide support, where required, in relation to external exploitation cases, which have been identified in close proximity to our branch locations.

Through working closely with the GLAA and the police, we have supported to identify 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 the communities we operate.

First Call Contract Services are members of the Compliance 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 and promote a more collaborative approach within the recruitment industry.

| Year | Cases Identified | Cases Resolved | Under Investigation | Investigative Body |
|------|------------------|----------------|---------------------|--------------------|
| 2023 | 1                | 1              | 0                   | Police             |
| 2022 | 1                | 1              | 0                   | N/A                |
| 2021 | 1                | 1              | 0                   | GLAA               |
| 2020 | 2                | 2              | 0                   | GLAA               |
| 2019 | 4                | 4              | 0                   | Police             |
| 2018 | 2                | 2              | 0                   | GLAA               |
| 2017 | 1                | 1              | 0                   | GLAA               |

# Governance, Partnerships & 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 - Verified Advanced Business Partner
- Responsible Recruitment Toolkit - Advanced Business Partner
- Sedex - Member
- Compliance Intelligence Network
- Association of Labour Providers Member (ALP)
- Herts Constabulary – Serious Organised Crime Group
- Norfolk & Suffolk 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
- Continually review internal training processes
- Strengthen our network industry intelligence
- Identify and use opportunities for collaboration to verify and help resolve risk issues
- Improve worker awareness and engagement