

## **Introduction**

Our business recognises that we could be at risk of exposure to modern slavery and human trafficking. We recognise that these practices are serious crimes that violate fundamental human rights and are incompatible with our values and principles. We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business or in our supply chains. This policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere within our supply chains. We all have a responsibility to be alert to the risks, however small.

This statement has been produced in accordance with the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 2024/25.

## **Organisation's structure**

People Solutions is an independently owned recruitment business, established in 1979. As a recruitment business we are fully aware of the risks regarding slavery and human trafficking. People Solutions has circa thirteen offices and we manage multiple sites throughout the UK with a Head Office in the West Midlands.

## **Our supply chains**

Our supply chains include, agencies, distribution, procurement of goods and services.

## **Supplier adherence to our values and ethics**

We have zero tolerance to modern slavery and human trafficking. To ensure that all our supply chains and contractors comply with our values and ethics, we have a dedicated compliance team, which consists of representatives from the following departments: Compliance, Human Resources, Procurement and Sales. We ensure that our supply chains and contractors have a suitable Modern Slavery Policy and Human Trafficking Policy.

## **Our policies on slavery and human trafficking**

We adopt a culture that encourages the identification and reporting of any such risks within our business. Our Anti-Slavery and Human Trafficking Policy (included in our Modern Slavery Policy) reflects our commitment to acting ethically and with integrity in all our business relationships. This is to secure implementation and enforcement of effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in the business or our supply chains.

All policies are reviewed regularly and modified to incorporate any findings from investigations by our trained Compliance team and subject matter experts.

People Solutions are committed to eliminating modern slavery, human trafficking, forced labour and similar human rights abuses.

### Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk, we adhere to our policy standards along with the guidelines from Stronger Together, ALP and the Ethical Trading Initiative. As part of our due diligence, suppliers are audited prior to supply and re-audited every year to ensure adherence to our strict standards of ethically transparent supply chains. Our audits include checks on Right to Work, proof of address and National Insurance Number, payslips, duplicate bank details, monitoring of address checks, holiday pay process, memberships (e.g. Sedex, Stronger Together) and if the supplier has a GLAA licence and certificate.

We also have in place systems to:

- Identify and assess potential risk areas in our supply chains,
- Mitigate the risk of slavery and human trafficking occurring in our supply chains
- Monitor potential risk areas in our supply chains
- Ensure all workers sit with a Consultant to complete a new starter questionnaire to highlight any concerns or support that may be required

It is the responsibility of all employees to report any reasonable suspicions of illegal employment and exploitation of employees, and it is People Solutions policy that an employee should not suffer as a result of reporting reasonably held suspicions and there must be no lawful discrimination on any grounds.

### Whistleblowing Hotline

We have a whistleblowing policy in place and a free, confidential Whistleblowing Hotline for individuals to raise any concerns that they may have. Reports can be made anonymously. We have Whistleblowing posters displayed across our branches, managed sites and Head Office and the poster is available on the worker portal.

As a business we commit to exacting standards of ethical, moral, and legal conduct. We encourage anyone who has any concerns about any aspect of the business to raise them without fear of detriment.

If we receive a report or suspicion of modern slavery or human trafficking, this will be taken extremely seriously, and the report must be made to a director immediately. We will investigate promptly and thoroughly. We will take appropriate action to address any issues identified and will report the matter to the relevant authorities if necessary.

## **Training and Awareness**

We understand the importance of ensuring that all our staff are equipped with the knowledge to allow them to deal with any modern slavery concerns safely and in a timely manner. Staff are provided with appropriate training to ensure that relevant employees understand the risks of modern slavery and human trafficking within our business and supply chains. Employees are encouraged to raise concerns; these include but are not limited to:

- Any suspected or actual act of slavery or servitude
- Any suspected or actual act of forced or compulsory labour
- Any suspected or actual act by a supplier of goods or services of illegal employment or exploitation.

We have reviewed and developed the anti-modern slavery processes and training that is delivered during the induction process and also the mandatory training delivered throughout the year. Our training records capture mandatory refresher dates for current employees ensuring all employees receive modern slavery training as a minimum once a year.

We will provide training to all employees and relevant stakeholders to ensure they understand the risks of modern slavery and human trafficking and their responsibilities under our policy. We have a dedicated in-house training team who facilitate and deliver training for all employees. To ensure a high level of understanding of the risks of modern slavery and human trafficking, as well as all aspects of regulations, laws and standards in our supply chains and our business, we provide training to all our employees. All employees are required to complete an assessment following any training with a set pass rate to be achieved. Additional training is delivered if required.

In line with our ISO9001:2015 accreditation all our training materials and support documents are standardised to ensure complete clarity and understanding of the information that is provided.

All new starters are required to attend a Company induction which includes a dedicated module covering Modern Slavery and Human Trafficking, GLAA, Stronger Together, Employee Safeguarding and Wellbeing, and Ethics. This identifies the key areas, what to look for and what to do if concerns are raised. Feedback is obtained for all training modules in order that any suggestions or developments can be built into future training.

All employees receive mandatory refresher training, followed by an assessment, annually, including those staff involved in the supply chain, e.g. Procurement, Sales etc. to ensure that they are aware of our stance on preventing slavery and human trafficking within our business and supply chains.

Our Learning and Development team provide bespoke training for individuals and teams throughout the business, working alongside our clients, drawing upon previous cases and investigations that have been publicised. If any areas are identified as requiring improvement during bespoke training a development plan is put in place where needed.

We also now have established a relationship with Bright HR, where the HR team can access and assign e-learning modules to our employees ad-hoc. The modules include modern slavery, anti-bribery and corruption, anti-money laundering and whistleblowing.

Representatives from the dedicated Compliance team including, Human Resources, Procurement and Sales along with nominated employees attend workshops, roadshows, and webinars, provided by Gangmaster Labour and Abuse Authority, Association of Labour Providers, Stronger Together and HMRC.

Stronger Together Posters are distributed across all sites and branches to raise awareness of modern slavery and any actions that should be taken.

We regularly review and update our policies and procedures to ensure they are effective in preventing and detecting modern slavery and human trafficking.

All employees have access to the following policies incorporating ethical standards and can be accessed via a temporary worker portal or company intranet:

- Anti-Slavery and Human Trafficking Policy
- Harassment and Bullying Policy
- Whistleblowing Policy
- Equal Opportunities Policy
- Stronger Together information
- Preventing Hidden Labour Exploitation Policy
- Anti-Corruption & Bribery Policy
- Data Protection Policy
- Company Values – Including 'Protect on all fronts'

Local and national cases of combating modern slavery are shared to our employees via the company intranet when new information is available.

### **Our effectiveness in combating slavery and human trafficking**

Monitoring our effectiveness in the prevention of slavery and human trafficking is taken very seriously at People Solutions. We use the following means to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Business function reports including duplicate mobile phone number checks, address checks and bank details
- Monitoring working hours to ensure compliance across the workforce over a seventeen-week period
- Internal staff training and induction process. The training includes our brand and our standards, right to work, proof of address and National Insurance, assignment details,

Modern Slavery videos from Stronger Together, what is modern slavery, labour exploitation, spotting the signs, what we do as a business, what to do if you suspect, Whistleblowing and external bodies we work with. At the end of each training session the employee completes an assessment to assess their understanding of the training

- Our suppliers are obliged to audit their own supply chains and report on their findings in 2025/2026
- Internal audits including worker interviews, checking of bank details, email addresses for payslips, right to work checks, proof of address and National Insurance linking to business function reports, new starter questionnaires specifically designed to spot modern slavery, medical questionnaires and 48 hour opt-out
- Compliance department complete weekly welfare calls to help identify if there are any issues, where a potential issue is discovered, this is immediately highlighted to either the HR Director, Compliance & Business Support Director and/or the HR team to allow action to be taken promptly

This statement is approved by the Board of People Solutions on 1<sup>st</sup> April 2025.

**Matthew Reddy**  
**Chief Executive**