

## 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 have a zero-tolerance policy towards modern slavery and human trafficking and will take all necessary steps to ensure that they are not present in any part of our business or 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 2023/24.

## Organisation's structure

People Solutions is an independently owned recruitment business, established in 1979. People Solutions has offices and we manage 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, outsourcing and subcontracting.

## Supplier adherence to our values and ethics

We have zero tolerance to modern slavery and human trafficking. To ensure that all in our supply chain 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 are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of 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 developed and reviewed regularly to incorporate our 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 and the Ethical Trading Initiative. As part of our due diligence, we ensure that all new suppliers are visited on site, 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, to include country and business transaction risk. Potential risk is a fraudulent ID Card
- Mitigate the risk of slavery and human trafficking occurring in our supply chains
- Monitor potential risk areas in our supply chains
- Ensure all workers complete a welcome questionnaire in order to highlight any concerns or support that may be required

### Whistleblowing Hotline

We have 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 visible on the worker app and portal.

As a business we commit to high 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. We will conduct an investigation 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. We have reviewed our induction process over the previous year, developing the anti-modern

slavery processes and training delivered. The induction process incorporates modern slavery training for all new starters in the first module. Our training records have also been developed to 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 of our employees.

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.

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’

Regular business updates are also communicated on the company intranet, detailing local and national cases of combating modern slavery.

All our employees are aware that it is their responsibility to report any concerns or non-compliance of our policies to the nominated people within the Company or via the ‘Whistleblowing Hotline.’

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

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 2024/2025
- 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 monthly welfare calls to help identify if there are any issues

This statement is approved by the Board of People Solutions on 1<sup>st</sup> April 2024.

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