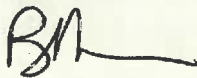


## Modern Slavery Statement

Modern Slavery can take many forms and is not always obvious. Cases of modern slavery are happening all the time and often on our doorstep go un-noticed. Modern slavery can take many forms including human trafficking, forced labour, exploitation of children or vulnerable adults and domestic servitude. Hewett Recruitment are passionate about protecting the workers they provide to clients and proactively apply processes to their recruitment & selection and supply chain to help eradicate any form of slavery.

This statement is made as part of Hewett Recruitment's commitment to eliminating the exploitation of people under the Modern Slavery Act 2015 (the Act). It summarises how Hewett Recruitment operates, the policies and processes in place to minimise the possibility of any problems, any risks we have identified and how we monitor them, and how we train our staff.

This statement is published in accordance with section 54 of the Act, and relates to the financial year April 2023 to March 2024. It was approved by the board of directors on 22<sup>nd</sup> May 2023.



**Signed Ben Mannion, Owner Director**

### **1 Our Business**

Hewett Recruitment is a limited company operating in the recruitment sector. We provide introduction services and the supply temporary workers in Industrial, Engineering, IT & Technical, Financial and Commercial sectors.

Hewett Recruitment is an independent business.

#### **1.1 Who we work with**

All of the hirers that we work with, and all of the work-seekers we provide, are known to and identified by our staff. All of the temporary workers we supply are identified by our staff. Some of these work-seekers operate through their own limited companies. Some of our work-seekers are supplied via other businesses, who facilitate providing them to the eventual hiring company.

#### **1.2 Other relationships**

As part of our business, we also work with the following organisations:

- sector-specific professional and regulatory bodies
- the Recruitment and Employment Confederation ([www.rec.uk.com](http://www.rec.uk.com)) and the Institute of Recruitment Professionals ([www.rec-irp.uk.com](http://www.rec-irp.uk.com))
- Gangmasters Licencing Authority [www.gla.gov.uk](http://www.gla.gov.uk)

## 2 Our Policies

Hewett Recruitment has a modern slavery policy. In addition, Hewett Recruitment has the following policies which incorporate ethical standards for our staff.

- Equality & Diversity Policy
- Customer Service & Complaints Policy
- Whistle Blowing Policy
- Anti-Corruption & Bribery Policy
- REC Code of Ethics

### 2.1 *Policy development and review*

Hewett Recruitment's policies are established by our leadership team, based on advice from HR professionals, industry best practice and legal advice, and in consultation with any relevant governing or regulatory body. We review our policies annually, or as needed to adapt to changes.

## 3 Our Processes for Managing Risk

Hewett Recruitment recognise the importance of all staff having awareness of the severity of modern slavery and as such have introduced the following processes and checks into its day to day recruitment of temporary workers:

- Red Flag Checklist
- Modern Slavery Worker Questionnaire
- Development of an 'Escalation Process'
- Temporary Workers Welcome pack
- Formal monthly auditing of key flag data areas

In order to assess the risk of modern slavery, we use the following processes with our suppliers:

- We review the potential for risk at regular intervals including the possibility of re-auditing a supplier or conducting spot checks.
  - Reviewing our supplier list
  - Identifying potential risks based on nature of business and sector

After due consideration, we have not identified any significant risks of modern slavery, forced labour, or human trafficking in our supply chain. However, we continue to be alert to the potential for problems.

Additionally, we have taken the following steps to minimise the possibility of any problems:

- We collaborate with our suppliers in order to improve standards and transparency across our supply chain by asking suppliers if they have their own Modern Slavery Policy/Statement
- Our staff are encouraged to bring any concerns they have to the attention of management.

## 4 Our Performance

As part of monitoring the performance of Hewett Recruitment, we track the following general key performance indicators:

- the percentage of workers supplied from audited businesses / our preferred supplier list. This is generally zero as we source our own workers.
- the effectiveness of enforcement against suppliers who breach policies
- the amount of time spent on audits, re-audits, spot checks, and related due diligence
- the level of modern slavery training and awareness amongst our staff

We carefully consider our indicators, in order to ensure that we do not put undue pressure on our suppliers that might increase the potential for risk.

## 5 Our Training

All of our staff receive training and support that is appropriate to their role. In particular:

- All of our staff receive informal awareness training as part of their initial staff induction, information around issues involving modern slavery and human trafficking, so that they can bring any concerns they have to the attention of Directors.
- The 'Red Flag list is discussed and the Modern Slavery Policy is explained in depth.
- As part of this, our staff are encouraged to discuss any concerns that they have. Training is refreshed when required and forms part of the formal employee induction programme.
- A dedicated training module on Modern Slavery is provided via our online training provider iHasco. This ensures all staff have awareness training surrounding Modern Slavery and ensure this topic is at the forefront of all staff's mind, in particular Temp consultants as they are the first line of defence and for Payroll.

## Modern Slavery Policy

1. Hewett Recruitment is committed to eliminating modern slavery, human trafficking, forced labour, and similar human rights abuses.
2. Hewett Recruitment is committed to ensuring that its staff and any workers it supplies (directly or indirectly) are not subject to behaviour or threats that may amount to modern slavery, human trafficking, forced labour, and similar human rights abuses.
3. Hewett Recruitment provides appropriate training and awareness information for all of its staff.

In particular:

- All of our staff receive awareness-raising information around issues involving modern slavery and human trafficking, so that they can bring any concerns they have to the attention of management.

4. Any staff, workers or other parties are strongly encouraged to report any concerns or suspicions that they might have to a director of the business
5. Reports surrounding these issues are taken extremely seriously by our board of directors, who are committed to ensuring that all investigations shall be prompt and effective. If our investigations reveal any issues, we are committed to taking appropriate action, including but not limited to:
  - Working with the appropriate organisations to improve standards including;
    - i. Stronger Together
    - ii. Hope for Justice
    - iii. Recruitment & Employment Confederation
  - Removing any individual from such a situation where appropriate
  - Removing that organisation/individual from our supply chain,
  - Passing details to appropriate law enforcement bodies.
6. We regularly monitor our risks in this area at regular intervals, including the possibility of re-auditing a supplier or conducting spot checks. Monthly checks of temporary workers data include:
  - **Addresses** – checking for multiple occupancy of either one residence or block of flats, close proximity
  - **Contact numbers:** checking for same contact numbers of sequential numbers leading in to potential control of workers by and individual issuing multiple phones
  - **Next of Kin:** checking for potential non-related names individuals or same contact for multiple individuals
  - **Bank details:** checking if bank account is in own name, no duplicate bank account numbers etc
  - **Change of bank details:** ensuring any subsequent request or change of bank details also match the individual personally
7. We have in place a number of processes and systems in place to deliberately test for and help identify vulnerable workers including:
  - **Numeracy and English Test** – these tests are to ensure the level of comprehension and understanding by temporary workers. These tests are administered on site and are completed alone with no support or intervention from anyone accompanying the worker. (The English test also ensures sufficient comprehension of the English language from a Health & Safety perspective for individuals entering the workplace)
  - **Face to face interviews** - all potential workers are required to undertake a face to face interview, an opportunity for the consultant to explore their work experience, circumstances and ability to perform the job they are applying for. If any individual is seen to speak on behalf of a worker then the applicant is removed and an interview conducted in private.
  - **No use of interpreters** - we do not permit the use of interpreters. From a H&S perspective individuals must have suitable command of the English language to be able to respond swiftly and safely in case of emergency at their place of work. Those who are unable to demonstrate clear communication are encourage to go away and practice their use of the English language and return when they feel their level has

improved to a sufficient level. *This limits the risk of individuals being spoken for and potential for incorrect information or force being used on an individual who cannot communicate freely or themselves.*

- **Modern Slavery Worker Questionnaire:** a list of interview questions specifically relating to modern slavery have been adopted to help identify any potential flags or concerns.
- **ID and Right to Work Checks**
- **Proactively working on verifying EU Worker Settlement Status**
- **Red Flag Checklist** – posters in the office and provided at induction as a reminder of potential flags for identifying vulnerable individuals and may act as a prompt for individuals to self-identify.
- **Development of an ‘Escalation Process’:** any and all concerns relating to potential modern slavery are escalated directly to a company director
- **Temporary Workers Welcome Pack:** includes the addition of a dedicated section on modern slavery, highlighting to individuals the importance Hewett’s place on tackling modern slavery. It is hoped this will provide peace of mind for candidates and offer information to help individuals self-identify as well as acting as a deterrent to potential traffickers.
- **Car Sharing** – we do not permit car sharing, which could encourage multiple occupants of houses or those under control being shipped to site by a controlling individual. This is also to ensure that each worker is responsible for attending site (should the owner of the vehicle be unable to attend work this could render several temporary workers unable to attend site and cause a detriment to the service we provide to our clients).
- **Formal monthly auditing of key flag data areas:** Monthly auditing is in place in order to cross-check data for similarities/duplications in temporary worker data.
  - **Addresses** – checking for multiple occupancy of either one residence or block of flats, close proximity
  - **Bank details:** checking if bank account is in own name, no duplicate bank account numbers etc

**As part of our efforts in this area, we publish a modern slavery statement on an annual basis.**

8. We would also recommend reading this in conjunction with our other policies, including our:
- Equality & Diversity Policy
  - Customer Service & Complaints Policy
  - Whistle Blowing Policy
  - Anti-Corruption & Bribery Policy
  - REC Code of Ethics

This policy was adopted in April 2017 after being agreed by our Board of Directors. It is reviewed annually to ensure it continues to support the organisations commitment to eliminating Modern Slavery.

## RED FLAG ALERTS FOR SIGNS OF MODERN SLAVERY

	What to Look for (flags):
<b>CONTROL</b>	<ul style="list-style-type: none"> <li>Worker is introduced to company by person claiming to be their family member or friend.</li> <li>Worker speaks on behalf of other workers, acts as interpreter.</li> <li>Person befriends staff and office workers at short notice.</li> </ul>
<b>APPLICATION FORMS</b>	<ul style="list-style-type: none"> <li>Not completed by applicant.</li> <li>Person present who acts as interpreter.</li> <li>Similar errors/same handwriting on forms/false references.</li> <li>Scant details on form.</li> </ul>
<b>APPLICANT</b>	<ul style="list-style-type: none"> <li>Appear frightened, agitated, secretive and acts as though instructed by another.</li> <li>Unable to speak the language of country where job will be.</li> <li>Answers appear scripted.</li> </ul>
<b>MOBILE PHONES</b>	<ul style="list-style-type: none"> <li>No contact number/provides a number that is not theirs.</li> <li>Number is the same for several workers.</li> <li>Sequential numbers for applicants.</li> <li>Same number for several workers/next of kin/emergency contact</li> </ul>
<b>BANK ACCOUNTS</b>	<ul style="list-style-type: none"> <li>Worker does not have a bank account.</li> <li>Same bank account for multiple workers.</li> <li>Applicant provides bank details written down.</li> <li>Worker does not have bankcard or PIN number written on back</li> </ul>
<b>ACCOMODATION</b>	<ul style="list-style-type: none"> <li>Multi Occupancy of the same address (3+)</li> <li>Poor quality accommodation/overcrowded.</li> <li>Applicant does not know their address or landlord's details</li> <li>Rents house from employer or person working for company</li> </ul>
<b>TRANSPORT</b>	<ul style="list-style-type: none"> <li>Applicant has no means of transport to work.</li> <li>Workers transported to work in mini bus/people carrying vehicle.</li> <li>Charged excessive transport costs.</li> <li>Transported to work when no work or not collected from work.</li> <li>Driver of transport not employed by company or agency.</li> </ul>
<b>WORKER</b>	<ul style="list-style-type: none"> <li>Lifestyle does not reflect monies earned (poor health/unkept)</li> <li>Does not engage with other workers/staff.</li> <li>Malnourished/unexpected injuries.</li> <li>Not registered for dentist/doctor/pregnant woman not attending anti natal classes.</li> </ul>
<b>WORK PLACE</b>	<ul style="list-style-type: none"> <li>Worker appears controlled in the workplace.</li> <li>Increase of same nationality as supervisor/recruiter.</li> <li>Increase in near misses or reported accidents at work.</li> <li>Workers always at work (not taking holiday/working overtime)</li> </ul>
<b>LEAVERS</b>	<ul style="list-style-type: none"> <li>Increase in turnover of staff.</li> <li>Increase in turnover of staff based on nationality.</li> <li>Staff leaving that have connections to staff member/recruiter who leaves.</li> </ul>
<b>WORK INTERVIEWERS</b>	<ul style="list-style-type: none"> <li>Worker doesn't know the full name of person finding job or accommodation.</li> <li>Worker discloses 'paid cash for job' or 'work hours'</li> <li>Worker does not receive payslips and not aware of actual pay</li> <li>Worker appears reluctant to answer questions</li> </ul>

## Modern Slavery – Worker Questionnaire

These questions must be incorporated into the standard candidate interviewing process for ALL temporary workers.

	Comments
<p><b>1. <u>Where they lived/Family &amp; Friends</u></b></p> <ul style="list-style-type: none"> <li>➤ Explore with Worker his/her Country of Origin, place they/she lived, details of their family, which members live in UK and who they work for.</li> <li>➤ If any of the following terms are mentioned e.g. friend, brother, uncle etc, establish what they actually mean.</li> <li>➤ Identify their level of English. If it is not great ask what they are doing to improve it?</li> <li>➤ Who provides translation for them outside work</li> </ul>	
<p><b>2. <u>Work History</u></b></p> <ul style="list-style-type: none"> <li>➤ Try and establish their work history from When they left school to now.</li> <li>➤ Obtain as much detail as possible and include skills gained and pay they have received</li> <li>➤ Do they have a CV?</li> </ul>	
<p><b>3. <u>Why they came to the UK to work</u></b></p> <ul style="list-style-type: none"> <li>➤ Explore reason they came to UK and full Details of how they got here and any costs they had to pay.</li> <li>➤ Are they still having to pay costs to anyone? If so – who? Take details</li> <li>➤ Explore why they came to that area of UK</li> </ul>	
<p><b>4. <u>Living arrangements?</u></b></p> <ul style="list-style-type: none"> <li>➤ Where do they live?</li> <li>➤ How did they end up living there? What arrangements were made? Why are they living in this house?</li> <li>➤ Who helped make the arrangements? How do they know this person? Take details</li> <li>➤ What money do they pay to live there? How do they pay and to who? Is anything in writing?</li> <li>➤ What is the condition of the house they live</li> </ul>	



<p><i>in? Is it clean and tidy? Do they like living there?</i></p> <ul style="list-style-type: none"> <li>➤ <i>Do you have access to medical treatment away from work? How would you do this and where?</i></li> <li>➤ <i>Where do you keep your valuables at home? Can you access them whenever you want?</i></li> </ul>	
<p><b>5. Receipt of Wages/Debts</b></p> <ul style="list-style-type: none"> <li>➤ <i>Do you know how much you should be Getting paid working in the UK?</i></li> <li>➤ <i>What did you get paid in your old job?</i></li> <li>➤ <i>Do you have to pay any of your wages to anyone else? If so-who? Take details</i></li> </ul>	
<p><b>6. Overtime</b></p> <ul style="list-style-type: none"> <li>➤ <i>Have you ever worked overtime or do you Want to work overtime if it ever becomes available?</i></li> <li>➤ <i>Is this your own choice? Why do you want to work overtime or why have you worked it in the past?</i></li> <li>➤ <i>Are you aware of how many hours you can do during the working week in the UK?</i></li> </ul>	
<p><b>7. Support Mechanism</b></p> <ul style="list-style-type: none"> <li>➤ <i>If you have any problems with anything away from work who do you go to for help? What would you go to?</i></li> </ul>	
<p><b>8. Transport</b></p> <ul style="list-style-type: none"> <li>➤ <i>How do you get to and from work? Do they pay? Who do you get to work with?</i></li> <li>➤ <i>How do you get home at night? Have you got any arrangement you have to keep? With who?</i></li> </ul>	
<p><b>9. Worker Rights</b></p> <ul style="list-style-type: none"> <li>➤ <i>Explore if they understand their rights as a worker in UK.</i></li> <li>➤ <i>If left an agency explore if they were paid outstanding holiday pay or if anything else was owed to them</i></li> <li>➤ <i>Have you received your terms of employment/contract from the agency/Forest Garden (if perm) and you understand them?</i></li> <li>➤ <i>Are you free to stop working here if you</i></li> </ul>	

<i>Chose to?</i>					
<b>10. Workplace/Agency Issues</b> <ul style="list-style-type: none"> <li>➤ <i>Explore if there are any workplace/Agency issues e.g. do you feel you are being discriminated against in the workplace by the company or any of your colleagues?</i></li> <li>➤ <i>Do you pay or did you pay a fee to the Agency to get this position?</i></li> </ul>					
<b>11. Health and Welfare</b> <ul style="list-style-type: none"> <li>➤ <i>Are they registered with a GP?</i></li> <li>➤ <i>Are they registered with a dentist?</i></li> </ul>	<table style="width: 100%; border: none;"> <tr> <td style="width: 50%; text-align: center;">YES</td> <td style="width: 50%; text-align: center;">No</td> </tr> <tr> <td style="text-align: center;">YES</td> <td style="text-align: center;">No</td> </tr> </table>	YES	No	YES	No
YES	No				
YES	No				
<b>12. Any other comments</b> <ul style="list-style-type: none"> <li>➤ <i>Have you ever heard of the term 'Modern Slavery'?</i></li> <li>➤ <i>What does it mean to you and what do you think it is?</i></li> <li>➤ <i>Where do you think it happens?</i></li> </ul>					
<b>13. Any other comments</b>					

If you think you have identified one or more concerns or potential flags or wish to report anything else then please contact your line manger immediately.