



MODERN SLAVERY STATEMENT 2020

Brightwork
Recruitment

Introduction

Brightwork is part of the Staffline Group which is the UK's leading provider of blue collar, temporary workers, supplying over 60,000 personnel per day to circa 1,700 private sector clients, operating over 400 locations in UK, Eire and Poland. This labour provision spans a wide range of industries including agriculture, drinks, driving, food processing, logistics and manufacturing.

Brightwork recognises that Modern Slavery and Human Trafficking could be potential risks to our business, and we are proud of our experience that has grown through the journey since we first started our campaign to join with other, like-minded businesses to help victims of modern slavery and human trafficking in the UK.

- There are an estimated 10,000 - 13,000 victims of modern-day slavery within the UK costing the UK economy about £4.3bn per year
- For each and every modern slavery crime discovered in the UK the estimated cost is over £330,000 including support for lost earnings and enforcement
- The number of potential victims (in Scotland) directed to the National Referral Mechanism increased by 125% in 2019.

Brightwork is committed to working with all organisations that take the issue of modern slavery as seriously as we do and who share our goal to reduce and eliminate this threat in the UK. Integrity is one of our core values. We have strict policies and procedures in place to ensure the consistent monitoring of our workforce for the signs of human trafficking and labour exploitation.

These checks are paramount in enabling us to investigate and identify exploitation at the earliest possible stage and are embedded into our policies and daily

procedures throughout our business, both through our front-line staff and centrally from our business support services team.

Brightwork founded the Scotland Against Modern Slavery Movement in 2017 which is focused on raising awareness of modern slavery in the Scottish business community. We partner with the Scottish Government, Police Scotland, Gangmasters Labour and Abuse Authority, Migrant Help and several other organisations, NGO's and charities, as part of this group, leading a number of funded events since 2017 to help educate businesses and generate awareness.

The Scottish Government's Human Trafficking and Exploitation Act 2015 provides further legislative grounding in Scotland and Brightwork collaborates with the Scottish Government's Human Trafficking Team to ensure that the Scottish business community is aware of this.

We partner with Migrant Help in Scotland which is contracted with the government to provide support and help for those victims of modern slavery who are rescued. Brightwork has committed to help find work for those victims through our client and community relationships.

We are confident that we have the right checks in place to minimise the risk of modern slavery, human trafficking and labour exploitation taking place within our supply chain. However, should our business be infiltrated, we are able to react quickly and efficiently to resolve cases. This response is due to the knowledge and experience held within the Brightwork Compliance Team, the awareness levels of the wider workforce, and the relationships we hold with the relevant government authorities.



Due Diligence, Processes and Action Taken

Throughout our working relationship with every worker, our commitment is to ensure the safety, health and wellbeing of that individual. We have processes, policies and a programme of training in place to ensure all our staff conduct correct and regular checks, enabling the swift identification of any issues or concerns. We invest heavily in compliance via a dedicated team of highly experienced individuals trained in assessing risk and capable of dealing with any problems confidently, competently and timeously.

From the moment a potential worker chooses to engage with Brightwork, the checks commence. All interviews are completed face-to-face with each potential worker on a one-to-one basis, making sure that they have freely chosen to attend, they have control of their own documentation and have a clear understanding of our safeguarding processes. In addition, throughout the registration and interview process, all information provided on application and registration documents is checked and verified as being the worker's own. We also discuss with the worker how they heard of Brightwork, what attracts them to the role about which they are enquiring and how they travelled to the interview and how they intend to commute to and from work.

All information is uploaded onto our central IT platform which provides full visibility to our Compliance Team. Data validations, both manual and automated, will highlight anything that may look suspicious, such as shared bank accounts, email addresses, telephone numbers and addresses.



In the event that any of our staff identifies anything suspicious either through the interview itself or from analysis of the information once interrogated via Compliance, our Red Flag Policy details how the matter must then be escalated and managed. The Compliance Team is always on hand to offer any help and advice required.

Worker education begins at the induction stage, giving an insight into modern slavery, explaining why it is illegal in the UK and what the worker should do if they suspect it is happening to a colleague or they are a victim themselves.

Brightwork is entering into our third year as a business partner of the Stronger Together alliance and our induction programme currently shares their awareness video (Daniel and Weronika) with all our workers. Their literature is also provided to each worker, which includes contact details for the relevant authorities who can assist them.

During their employment, regular checks are conducted on workers' welfare in the form of surveys and worker interviews and our Compliance Team also undertakes regular on-site audits. Continuous monitoring of workers' details for data considered to be "red flags" is carried out via the Staffline centralised IT division.

Where we use additional avenues of recruitment, such as other recruitment agencies supplying labour into Staffline and Brightwork, whether based in the UK or overseas, we ensure that these are licensed by the Gangmasters Labour and Abuse Authority and remain compliant with the GLAA's standards. We also conduct our own regular, internal audits on these "second tier" suppliers to ensure they meet our strict standards.

In addition, we expect all labour suppliers in our supply chain to have implemented a process which includes the necessary checks to help identify indicators of modern slavery throughout their business. All these "second tier" suppliers are required to sign a statement of commitment to this process before we undertake to use their services.

Brightwork is totally committed to our compliance and ethical standards and we strive to operate best practices at all times. Everyone in the company is introduced to and trained to comply with our compliance standards and operating procedures at the start of their employment.

All staff are provided with the tools to identify indicators of human trafficking and forced labour, and the reporting channels are very clear for any points of concern. If an exploitation issue arises, it is immediately flagged to the appropriate authorities for investigation with the full co-operation of Brightwork and Staffline supporting throughout the case.

Over the years we have built up an excellent relationship with enforcement and regulatory bodies and we regularly seek advice and guidance on any matters of concern. We are active members of the GLAA Labour Provider Labour User forum, recognising that this type of collaboration promotes sharing of good practice with other businesses.



As a direct result of a collaboration between other industry members and the GLAA, Staffline helped write, produce and fund a short film on modern day slavery within the UK to assist other businesses with identification and prevention. This year we have also invested in a further supply chain risk strategy to ensure that any potential areas are quickly identified, and processes amended as appropriate.

We are active within anti-slavery networks, working with others to ensure that victims are identified and looked after and, once they are ready to go back into employment, we can help with their future placements for employment, helping them get their lives back on track.



Effectiveness and commitment

At Staffline we are fully aware and accept that with modern slavery can happen anywhere, at any time, and in any part of our business.

We hope that one day the steps we have taken and continue to take will eradicate this, but we continue, as in previous years, to be vigilant, keep all our staff fully updated with new developments, and constantly strive to monitor the effectiveness of our processes and policies.

As we have previously alluded, if an issue exists we are confident it can be correctly identified and that our staff are sufficiently trained to know what to do and when, without placing any of our workers at any further risk. We will continue to work effectively and efficiently with our partners, especially those within enforcement, to ensure that any identified victim is provided the full support of the business in support of their recovery.

Modern slavery and human trafficking is an international problem, and with the links to many criminal organisations it remains a high risk to any supply chain or business.

Brightwork, through our parent company Staffline, will continue its investment in the identification and prevention of modern slavery. It remains a high priority for the business and that of our valued clients.

Signed:



Frank Atkinson, Group Managing Director

For and behalf of Staffline Recruitment Limited

