



MODERN SLAVERY STATEMENT 2021-2022

Brightwork
Recruitment

Introduction

The COVID-19 pandemic and subsequent economic impacts have presented completely unprecedented scenarios for all businesses and communities in the last year. Swathes of the economy have been forcibly closed for long periods and this has left more people than ever before facing real hardships and leaving them far more vulnerable to exploitation and modern slavery.

Increasing demands across industry sectors such as food distribution and logistics have presented challenges to Brightwork, and all other labour providers, throughout the pandemic. However, at the same time, the pandemic exposed greater opportunities for the activities of illegal gangmasters and exploiters to flourish undetected and undisturbed around the world.

At Brightwork we recognise that modern slavery and human trafficking could be potential risks to our business, and our experience in this matter has grown and evolved 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.

Brightwork is part of the Staffline Group which is the UK's leading provider of temporary workers, supplying around 35,000 personnel per day, operating within 400+ locations throughout the UK, Eire and Poland. This labour provision spans a wide range of industries including agriculture, drinks, driving, food processing, logistics and manufacturing.

We are 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. Doing the right thing 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, NGOs 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 Compliance function, the awareness levels of the wider workforce, and the relationships we hold with the relevant government authorities.

Due Diligence, Processes and Action Taken

In the event that any of our staff identifies anything suspicious either through an interview or from analysis of information once reviewed 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 fourth year as a business partner of the Stronger Together alliance and our induction programme currently shares a wide range of their training resources 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 employees 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.

This year, Brightwork has started broadcasting a series of news podcasts with guests ranging from the UK’s Independent Anti-Slavery Commissioner to the Scottish Government Cabinet Secretary for Justice and we have launched the Scotland Against Modern Slavery (SAMS) website. The SAMS movement now has 20+ Corporate Partners signed up and committed to playing their part in eradicating human trafficking and modern slavery by sharing good practice and intelligence across the corporate sector, and assisting victims in Scotland by finding them sustainable work and helping them to become survivors. Each organisation within the Corporate Partner group has appointed an ambassador whose remit is to take a lead role within their respective organisations, delivering the Scottish Government’s Human Trafficking and Exploitation Team strategy, ensuring they exemplify best practice and generating awareness of modern slavery to their stakeholders and other businesses across Scotland.

Effectiveness and commitment

At Brightwork 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 employees 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 employees 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

