

ENABLING PEOPLE INTO GOOD WORK.

MODERN SLAVERY STATEMENT 2022-2023

ISSUED BY FRANK ATKINSON,
GROUP MANAGING DIRECTOR

JULY 2022



INTRODUCTION

At Brightwork-Staffline, we place the welfare of all colleagues, whether permanent or temporary, at the heart of everything we do.

Everyone who works with us, whether they be direct employees or those within our supply chains, is treated with the upmost respect. We do what we can to assist them and help make their workplaces and environments safe, secure and free from harm.

We recognise that rogue gangs of unlicensed gangmasters will aim to target businesses like ours. Because of this, we maintain close working relationships with all the relevant UK enforcement authorities, anti-slavery networks and specialist charities to be alert to the issues and learn from any cases so that we can build more barriers to help prevent modern slavery taking place. It's a continuous learning path and we will always have an extremely strong focus on understanding more about these crimes and we take a zero-tolerance approach within the business.

In 2021 our organisation carried out 55 investigations in which worker welfare concerns had been raised. Of these, 33 were identified as having an element of modern slavery. This led to the rescue of 54 potential victims. We are pleased to have helped the authorities by providing evidence and witness testimonies involving 17 victims.

Time and time again, we are in awe of the amazing work that charities, the Gangmasters and Labour Abuse Authority (GLAA) and other like-minded businesses are doing to educate, train and raise awareness. We feel fortunate to be able to align closely with these experts, working with them to form an important link in the process, offering survivors of modern slavery a safe place to work when they are ready to get back into working life.

We are honoured to have assisted with the placement of 37 survivors of modern slavery into work since 2021.

ABOUT US

Established in 2006, Brightwork-Staffline is Scotland's largest recruiter and workforce provider, delivering recruitment and workforce solutions to leading brands. We work in partnership with clients and candidates, meeting business needs and matching people with opportunities. Our vision is to be Scotland's most trusted recruitment business.

Brightwork-Staffline is part of the Staffline Recruitment business, the UK's leading provider of temporary workers, supplying around 35,000 personnel per day, operating within c.400 locations throughout the UK and Ireland.

Our labour provision spans a wide range of industries including agriculture, drinks, driving, food processing, logistics and manufacturing.

Thanks to our industry-leading technology, we now have an unrivalled database of eligible workers and the means to engage them. This, alongside "Have Your Say" (our experience management platform), ensures the highest levels of worker satisfaction and drives increased worker retention.

We will continue to invest in both our technology and experience solutions and ensure that we remain the trusted market leader.

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.

Our culture and philosophy are encapsulated within our brand purpose, of "Enabling People into Good Work".

TRAINING & AWARENESS

Keeping the subject of modern slavery and how it impacts our brand (and our clients) is paramount in looking after all workers and helping prevent the exploitation of individuals.

We begin the education with our permanent colleagues when they join us at our company welcome day, with insights into modern slavery and how we can help potential victims of this terrible crime.

Following on, there is an eLearning module with material updated constantly sharing news, headlines and topical briefs to keep it in the forefront of our colleagues' minds whilst they are liaising day to day with the workers on our front line.

Displaying posters, leaflets and helplines at all of our locations is a given and freely accessible for all of our workers to see. We encourage all of our operational teams to report any signs of exploitation into our Central Investigations Team, who are experienced in dealing with cases and co-ordinating with enforcement authorities and regulators.

Worker education begins at the induction stage, explaining how to recognise modern slavery and the forms that exploitation can take, and why it is illegal in the UK as well as guidance on what the worker should do if they suspect it is happening to a colleague or they are a victim themselves.

COLLABORATION

We welcome any partnerships with other businesses that want to work with us to improve standards, preventative measures, and controls to help join together in the fight to tackle modern slavery in the UK.

Brightwork-Staffline 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.

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.

Brightwork-Staffline director, Shan Saba, is a Trustee for the "Refugee Survival Trust" charity. The Trust provides refugees and people seeking asylum with practical support when it's most needed, building connections and campaigning for change. Many of the Trust's service users remain ineligible for work in the UK whilst they navigate the Home Office asylum process.

Often their workplace skills have been eroded, they are destitute and highly vulnerable to exploitation. On behalf of the Trust, we run educational workshops to prepare these people to become "work-ready", helping them to recognise exploitation and identify what "good work" (and good employers) looks like, how to write CVs, prepare for interviews, etc.

With a war underway in Ukraine in 2022, Brightwork has reached out to Ukrainians coming to Scotland through the Family and Homes for Ukraine visa schemes. We recognise that this population are at significant risk of exploitation and have been supporting a number of Ukrainians into work and assisting their families, hosts and employers with additional support, providing advice and guidance on how to recognise and avoid exploitative work.

POLICIES & PROCESSES

We are an advanced business partner and huge supporter of the Stronger2gether initiative.

Our policies are aligned with the Responsible Recruitment Toolkit to maintain high ethical standards and support our company values, one of which is to **“Do the Right Thing.”**

Our central SharePoint has been re-structured at the beginning of this year to hold all policies in one place for easy access for all of our teams across the business.

Investing in our IT platform to evolve our systems is a continuous improvement strategy, helping to strengthen the barriers to prevent infiltration from unlicensed gangmasters into Staffline and amongst our workers.

All Investigations undertaken by the compliance team have a closed loop process allowing all stakeholders to be updated, key learnings shared and a continuous evolution process to take place, improving reporting and for full transparency.

SCOTLAND AGAINST MODERN SLAVERY

Scotland Against Modern Slavery (SAMS) podcasts are hosted and broadcast via Brightwork with guests and speakers ranging from the UK's Independent Anti-Slavery Commissioner, to the Scottish Government Cabinet Secretary for Justice, even a previous UK Prime Minister.

The SAMS website enters into its second year with 50 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, 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.

During spring 2022, the Home Office worked with SAMS, delivering compliance workshops to SAMS Corporate Partners.

The Scottish Government's Trafficking and Exploitation Strategy Annual Progress Report highlights Brightwork's contribution via our work in developing SAMS, helping to inform and share best practice about human trafficking and exploitation throughout the business community in Scotland, commenting that SAMS success in raising awareness and supporting victims has been integral to the government's future strategy.

RISK ASSESSMENTS & MANAGEMENT

We understand that at times we will engage with other recruitment partners to assist supply to our clients.

We use GLAA licenced agencies, and audit them annually and check that they are all committed to preventing modern slavery and have the right level of due diligence checks in place. Being an active member of the Compliance Intelligence Network allows us to liaise with other like-minded labour providers.

Most cases involve close worker welfare checks and interviews, ensuring that we learn how we can improve our checks and make them more robust is fundamental. This in turn allows the Compliance intelligence Network to share to broader groups to help the wider industry.

MEASURING EFFECTIVENESS

Tackling modern slavery remains of the highest priority for us and our valued clients. Although there are many more tools out there to engage with to help every business, we recognise it's an ever-evolving cycle.

Experience shows that traffickers change their methods, the crime is hidden and not always easy to spot, and with various obstacles that we have all strived to overcome in the last two years, not least of which being a global pandemic, modern slavery is still very much prevalent.

We continuously review our investigative ways of working, take the time needed after every case that we are either involved in, or hear about and review and reflect, finding ways to improve our processes and practices.

Year on year, we learn more, develop and strengthen our processes, and engage with more partners building more and more relationships to help spread the messaging and do everything we possibly can to help prevent modern slavery in our supply chains.

COMMITMENT & SUMMARY

We continue to feel reassured that both the scale of our business and the high level of experience in our team helps immensely in our work with others to eradicate modern slavery from the UK.

Continuously reviewing our policies and processes, promoting our workers' rights and adapting to change is the key to staying ahead and protecting our workers. Keeping the communication channels open for all to report, the checks embedded through our values and principles and being approachable to all of our workers at all times through their journey working with us, is vital.

Brightwork-Staffline is totally committed to protecting our workers, our brand and those of our clients and will continue to work closely with our regulators and enforcement authorities to provide a safe place to work.

We believe there is no room for complacency and will continue our work and investment into the identification and prevention of modern slavery. Tackling human trafficking and labour exploitation and collaborating with others to raise awareness and prevent this from happening remains one of our highest priorities.

Signed:



Frank Atkinson, Group Managing Director
For and on behalf of Brightwork-Staffline

