



# Modern Slavery Statement



2022-2023

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# Introduction

**This statement is made as part of Safehands Recruitment's commitment to eliminating the exploitation of people under the Modern Slavery Act 2015 (the Act).**

It summarises how we operate, the policies and processes we have in place, how we identify and manage the risks, and how we train our staff. It is published in accordance with section 54 of the Act and relates to the financial year, 1st of August 2022 to 31st July 2023. It was approved by the Board of Directors in August 2023.



# About Us

Safehands Recruitment is a limited company that provides essential recruitment services within the health and social care sector.

Details of our group structure are available [here](#).

We supply both temporary and permanent staff, operate ethically and in a worker's best interest. The Core Values that drive us to be a leading service provider within the markets we operate in are very important to us as a company and they consist of:

## Guiding Principles



### Collaborative

We work collaboratively towards a shared goal of becoming the best and most professional business partner our clients could wish for, becoming an extension of their team, helping to shoulder their burden, and achieving mutual success.

### Brave

We're never afraid to challenge the status quo and actively encourage each other to be bold and inventive in our thinking to find the best solutions possible for our clients, our candidates and our business.

### Authentic

We remain true to the principles that have brought the business to where it is now, never forgetting that we are a people business, and that developing long lasting, genuine and human relationships is key to our success.

### Resilient

When faced with challenges, we show the strength of character needed to find new ways to get the job done, and to recover quickly from any setbacks we may face.

### Loyal

We're committed to the people around us, and demonstrate our loyalty by trusting, nurturing and supporting each other at every turn.

### Empowered

Our biggest asset is our people and we want them to grow in confidence and ability - so we empower individuals to make their own decisions free from the shackles of bureaucracy and a strict KPI structure.

### Inclusive

We're open-minded and listen carefully to all our colleagues' ideas and suggestions without pre-judgement. And we always remain mindful of our language and behaviour towards others.

# Our Commitment & Policies

**We commit to developing and adopting a proactive approach to prevent, respond to, and remediate issues of Modern Slavery and human trafficking. Our policies are developed and approved by our Senior Management Team to reinforce legal and ethical obligations. They apply to all individuals working for us and on our behalf in any capacity, including direct employees, agency workers, contractors, clients, consultants, and business partners. We enforce the policies through training and regular communication with our staff, as well as via contractual arrangements with our customers. All policies are reviewed annually or more regularly where appropriate.**

We have developed a Modern Slavery and Human Trafficking Policy which sets out main objectives for the business and outline our commitment to act legally, ethically and with integrity. It is supported by other internal documents, see pages 4 and 5.

The policies are based on the following standards:

- Care Quality Commission Standards
- Gangmaster and Labour Abuse Authority Licensing standards
- Ethical Trading Initiative Base Code
- International Labour Organisation Fair Recruitment Initiative
- The Employer Pays Principle
- The Dhaka Principles for Migration with Dignity
- The Guiding Principles on Business and Human Rights

# Internal Documents

1

## Anti-Bribery and Corruption Policy

This outlines our zero-tolerance approach to bribery, corruption, and fraud.

2

## Public Interest Disclosure (Whistleblowing) Policy

This provides guidance on confidential reporting and sets out process of investigation.

3

## Eligibility to Work Policy and Procedure

This provides details of, and business expectation related to right to work check process.

4

## Responsible Recruitment Policy

This defines our recruitment methods and practises.

5

## Ethical Trading Policy Statement

This outlines our commitment to ethical operations within the supply chain.

6

## Incident Reporting Process (Modern Slavery)

This provides step by step guidance for our staff members on how to report any Modern Slavery red flags.

# Internal Documents

7

Human Rights Policy

This outlines standards and principles we follow and expect from our stakeholders.

8

Young Workers Policy

This details measures the business takes to prevent risk to young workers.

9

Corporate Social Responsibility

This highlights our commitments and provide details of our cooperation with internal and external stakeholders.

10

Workers Handbook

This emphasises our values, outlines right and responsibilities of our workers and details ways of reporting concerns.

11

Modern Slavery Due Diligence Questionnaire

This is issued to customers and suppliers as part of our due diligence and risk assessment process.

# Our Partners

We recognise the importance of collaboration, which can further increase potential in tackling Modern Slavery. We partner with experienced external consultants and organisations to strengthen our knowledge, capability to detect, prevent and report, as well as ensure continuous improvement. This includes:

- Recruitment and Employment Confederation - corporate member since 2004
- Stronger Together - Business Partner since 2020 and Business Partner Advanced since 2022
- Association of Labour Providers – member since 2004
- Customers and suppliers to ensure aligned approach.

“As part of our improvement strategy in 2022/23, we invited a former GLAA and police officer to collaborate. They have assessed our practices and provided suggestions for further progress based on their experience and knowledge.”



# Training & Awareness

**Our Modern Slavery training forms a fundamental aspect of raising awareness of the issue and is delivered as follows:**

- All staff members undertake awareness training during their onboarding.
- Managers and recruiters attend more in-depth training sessions that focus on indicators and reporting.
- Leadership Team training covers supply chain due diligence, wider assessment of Modern Slavery risk and remediation for victims.
- Compliance and HR Team have additionally attended: Advanced Tackling Modern Slavery in UK Businesses and Investigative Interviewing Skills in the Workplace, delivered by Stronger Together.
- All workers are educated on Modern Slavery indicators and ways of reporting concerns at the beginning of the relationship and receive multi-lingual awareness materials.

In 2022, we started to offer further support, training and help with policy development to our clients, who feel like they do not have sufficient knowledge about Modern Slavery risk areas.



# Assessment & Management of Risk

Modern Slavery and human trafficking form part of our overall Business Risks, Opportunities and Interested Parties Register, which is managed by our Senior Management Team. It outlines any possible concerns associated within sectors we operate in, enables us to identify high risk areas and put measures in place to protect candidates, workers, clients, and us as recruiters.

Our due diligence and mitigation depend on the scale of the risk identified:

## Recruitment Fees

We do not use third parties to recruit overseas and only employ recruiters, who are pre-assessed and experienced. We gather feedback from workers about the onboarding process as part of anonymous surveys and internal auditing, to assess our practises and identify areas for improvements.

## Workers' Awareness

We deliver introductory training to all overseas applicants and explain Modern Slavery indicators, ways of reporting and possible remediation process. Workers are asked to download and use the Just Good Work app to further ensure understanding of their rights in the UK.

# Assessment & Management of Risk

## Clients' Awareness

We assess our clients' practises by auditing them prior to supply, issuing Modern Slavery questionnaires as part of our due diligence process and gathering workers' feedback. We work with them to raise awareness, share resources as Stronger Together Advanced Business Partner or offer necessary training.

## Governance

We have identified Modern Slavery Champions amongst our team, who are responsible for implementation of related policies and promoting a pro-active approach to tackle labour exploitation.

## Processes

We assess our operations and training efficiency by regular internal audits and frequent files spot checks conducted by our Compliance Team. We generate reports of post codes that have been frequently provided by our workers to eliminate any Modern Slavery red flags associated with accommodation. What is more important, we gather feedback from candidates, workers and clients. By constant interactive communication, the assessment of our practises is more accurate.

# How Do We Measure Our Performance

We have incorporated measurable factors into our strategy to enable us to track progress. Key Performance Indicators for 2022/23 financial year:

Key Performance Indicators for 2022/23 financial year:

Percentage of staff members trained on Modern Slavery and human trafficking	100
Number of cases of potential labour exploitation that we have investigated, none of which required further action from external bodies.	2
Percentage of workers interviewed as part of our internal audit process, that is part of Modern Slavery due diligence.	10
Percentage of customers who undergo an audit as part of our Modern Slavery due diligence. We issued Modern Slavery Questionnaires to all existing clients across the business to check their internal processes and awareness.	100
Number of partnerships developed to tackle labour exploitation. We have engaged with an experienced external consultant to improve our existing practises, offered training and assistance to 2 customers who have not had enough experience within Modern Slavery to develop internal policies.	2

# Our Strategy

**Our strategy remains focused on prevention and improvement. Baselines have been set for 2023/24 year, when we are planning to:**

- Strengthen our relationships with external stakeholders by increasing further the percentage of those who respond to our due diligence documents,
- Assess workers' retention rates more thoroughly to identify any possible reasons for unsatisfactory experience,
- Increase number of partnerships developed to tackle labour exploitation to strengthen our capabilities.



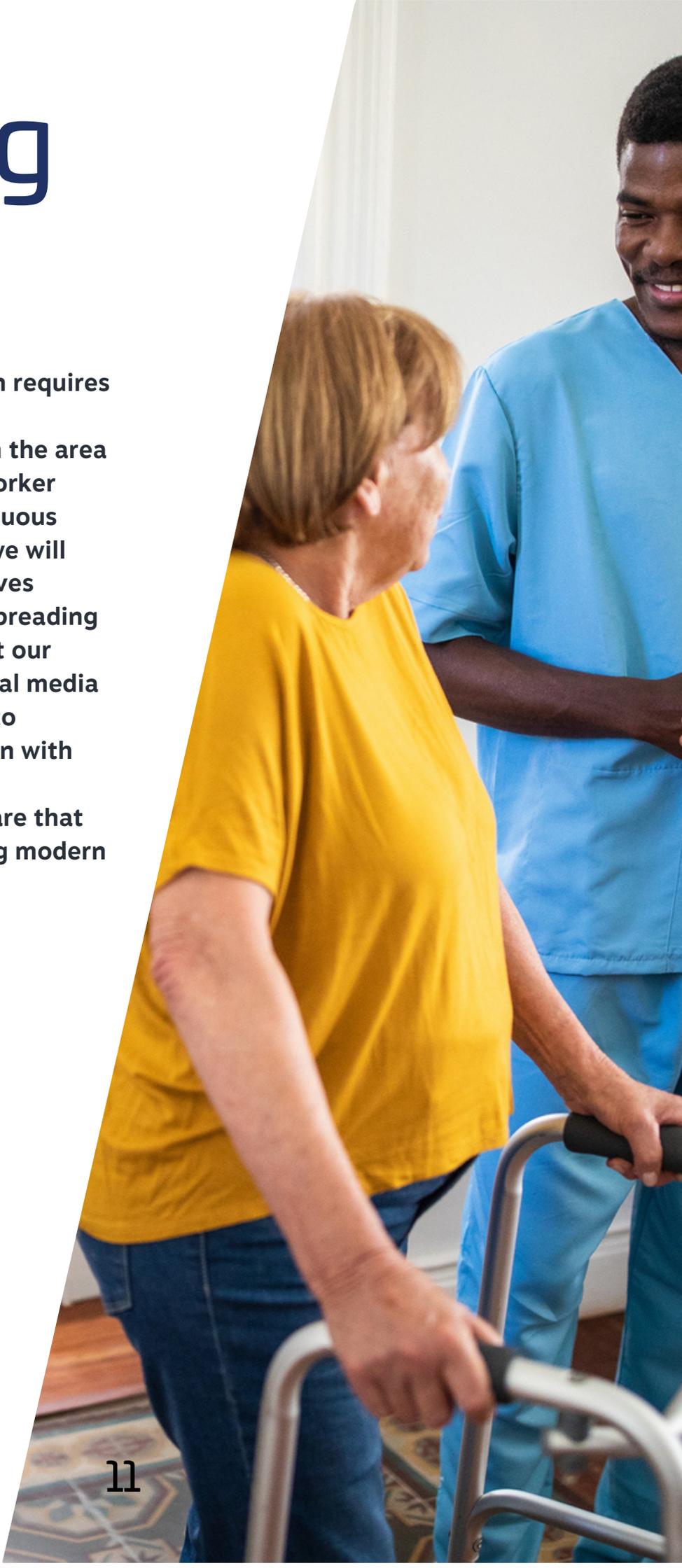
"Our strategy remains focused on prevention and improvement"

# Looking Ahead

Tackling labour exploitation requires commitment. As a leading recruitment business within the area and part of the Seasonal Worker Scheme, we strive to continuous improvement. In 2023/24 we will continue promoting initiatives alongside local NGOs and spreading awareness directly amongst our workforce and through social media channels. We are planning to strengthen our collaboration with clients and other external stakeholders, as we are aware that aligned approach in tackling modern slavery can reach further.



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