



# Modern Slavery Policy 2021

This statement is made as part of Engage Services commitment to eliminating the exploitation of people under the Modern Slavery Act 2015 (the Act). It summarises how Engage Services 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 2021 to April 2022. It was approved by the board of directors 12th April 2021.

## Introduction

This statement constitutes Engage Services Groups' modern slavery and human trafficking transparency statement as of May 2018. The statement sets down Engage Services commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

## 1 Our Business

Engage Services is a limited company operating in the recruitment sector. We provide introduction services and supply temporary workers in the education and construction sectors. Engage Services 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. We do not supply work-seekers to hiring companies through any intermediaries. The hiring companies that we work with are located in the UK. The workers we supply live in the UK, Ireland, Canada, Australia, South Africa, and the UAE.

### 1.2 Other relationships

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

- The Department for Education
- Crown Commercial Services
- the Recruitment and Employment Confederation ([www.rec.uk.com](http://www.rec.uk.com))

## 2 Our Policies

Engage Services has a modern slavery policy that is available to view on our website.

In addition, Engage Services has the following policies which incorporate ethical standards for our staff and our suppliers. To view a list of our data processing policies, please visit the Privacy page on our website:

<https://engageeducationalservices.com/policies/>

### 2.1 Policy development and review

Engage Services' policies are established by our senior leadership team, which include our CEO, Head of Education and Head of Marketing, based on advice from HR professionals, industry best practice and legal advice, and in consultation with our Head of HR, HR advisory consultants and the REC. We review our policies on a regular basis, or as needed to adapt to changes.



### 3 Our Processes for Managing Risk

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

When engaging with suppliers, we ask for evidence of their processes and policies, including commitments around modern slavery, human trafficking, forced labour, human rights, and whistle-blowing.

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.

After a review of our business activities, the Management can confirm that there are no high-risk activities or at risk of modern slavery or human trafficking. Responsibility for the Company's anti-slavery initiatives is as follows:

- Policies: The Head of HR is responsible for creating and reviewing policies. The process by which policies are reviewed is on an annual basis whereby they will look at industry best practices and implement any relevant amendments to the Company.
- Risk assessments: The Office Manager is responsible for risk assessments in respect of human rights and modern slavery by a process of reviewing our business activities, confirming the right to work of all candidates and that the rates of pay for all candidates are in accordance with the local legislation.
- Due Diligence: The Finance Director is responsible for due diligence in relation to known or suspected instances of modern slavery and human trafficking. The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence process includes a review of their financial history, what governing or regulatory body they are a member of, and customer references if a material supplier. Our aim is to build long-standing relationships with suppliers and make clear our expectations of business partners.

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

- We reserve the right to conduct spot-checks of the businesses who supply us, in order to investigate any complaints.
- We require the businesses we work with to publish a modern slavery statement.
- We collaborate with our suppliers in order to improve standards and transparency across our supply chain.
- Only senior members of staff who have undergone appropriate training for assessing modern slavery risks in the supply chain are authorised to sign contracts and establish commercial relationships in any area where we have identified the potential for risk.
- 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 Engage Services, we track the following general key performance indicators:

- The level of training amongst our staff;
- The speed with which we investigate related complaints, and the effectiveness of our whistle-blowing procedures;
- The level of compliance and transparency we have established in our supply chain.



- Review of our sage payroll and CRM to review our employee and candidate salaries to ensure they are above the national living wage.
- This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. The Board of Directors endorses this policy statement and is fully committed to its implementation.

Based on the potential risks we have identified, we have also established the following key performance indicators, which are regularly assessed by the senior leadership team:

- the percentage of suppliers who sign up to an appropriate code / provide their own modern slavery statements
- 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:

- Our leadership team receive detailed training in identifying and resolving concerns around modern slavery and human trafficking.
- Our recruiters undertake training courses that include guidance around modern slavery and human trafficking, as well as other wider human rights issues.
- 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.

As part of this, our staff are encouraged to discuss any concerns that they have.

Training is refreshed annually.



## Annex A – definitions contained in the Modern Slavery Act 2015

### Section 1 – Slavery, servitude and forced or compulsory labour

- (1) A person commits an offence if—
  - (a) the person holds another person in slavery or servitude and the circumstances are such that the person knows or ought to know that the other person is held in slavery or servitude, or
  - (b) the person requires another person to perform forced or compulsory labour and the circumstances are such that the person knows or ought to know that the other person is being required to perform forced or compulsory labour.
- (2) In subsection (1) the references to holding a person in slavery or servitude or requiring a person to perform forced or compulsory labour are to be construed in accordance with Article 4 of the Human Rights Convention.
- (3) In determining whether a person is being held in slavery or servitude or required to perform forced or compulsory labour, regard may be had to all the circumstances.
- (4) For example, regard may be had—
  - (a) to any of the person's personal circumstances (such as the person being a child, the person's family relationships, and any mental or physical illness) which may make the person more vulnerable than other persons;
  - (b) to any work or services provided by the person, including work or services provided in circumstances which constitute exploitation within section 3(3) to (6).
- (5) The consent of a person (whether an adult or a child) to any of the acts alleged to constitute holding the person in slavery or servitude, or requiring the person to perform forced or compulsory labour, does not preclude a determination that the person is being held in slavery or servitude, or required to perform forced or compulsory labour.

### Section 2 – Human trafficking

- (1) A person commits an offence if the person arranges or facilitates the travel of another person (“V”) with a view to V being exploited.
- (2) It is irrelevant whether V consents to the travel (whether V is an adult or a child).
- (3) A person may, in particular, arrange or facilitate V's travel by recruiting V, transporting or transferring V, harbouring or receiving V, or transferring or exchanging control over V.
- (4) A person arranges or facilitates V's travel with a view to V being exploited only if—
  - (a) the person intends to exploit V (in any part of the world) during or after the travel, or
  - (b) the person knows or ought to know that another person is likely to exploit V (in any part of the world) during or after the travel.
- (5) “Travel” means—



- (a) arriving in, or entering, any country,
- (b) departing from any country,
- (c) travelling within any country.

(6) A person who is a UK national commits an offence under this section regardless of—

- (a) where the arranging or facilitating takes place, or
- (b) where the travel takes place.

(7) A person who is not a UK national commits an offence under this section if—

- (a) any part of the arranging or facilitating takes place in the United Kingdom, or
- (b) the travel consists of arrival in or entry into, a departure from, or travel within, the United Kingdom.

### **Section 3 – Meaning of Exploitation**

- (1) For the purposes of section 2, a person is exploited only if one or more of the following subsections apply in relation to the person.

Slavery, servitude and forced or compulsory labour

- (2) The person is the victim of behaviour—
  - (a) which involves the commission of an offence under section 1, or
  - (b) which would involve the commission of an offence under that section if it took place in England and Wales.

Sexual exploitation

- (3) Something is done to or in respect of the person—
  - (a) which involves the commission of an offence under—
    - (i) section 1(1)(a) of the Protection of Children Act 1978 (indecent photographs of children), or
    - (ii) Part 1 of the Sexual Offences Act 2003 (sexual offences), as it has effect in England and Wales, or
  - (b) which would involve the commission of such an offence if it were done in England and Wales.

Removal of organs etc

- (4) The person is encouraged, required or expected to do anything—
  - (a) which involves the commission, by him or her or another person, of an offence under section 32 or 33 of the Human Tissue Act 2004 (prohibition of commercial dealings in organs and restrictions on the use of live donors) as it has effect in England and Wales, or



- (b) which would involve the commission of such an offence, by him or her or another person, if it were done in England and Wales.

#### Securing services etc by force, threats or deception

(5) The person is subjected to force, threats or deception designed to induce him or her—

- (a) to provide services of any kind,
- (b) to provide another person with benefits of any kind, or
- (c) to enable another person to acquire benefits of any kind.

#### Securing services etc from children and vulnerable persons

(6) Another person uses or attempts to use the person for a purpose within paragraph (a), (b) or (c) of subsection (5), having chosen him or her for that purpose on the grounds that—

- (a) he or she is a child, is mentally or physically ill or disabled, or has a family relationship with a particular person, and
- (b) an adult, or a person without the illness, disability, or family relationship, would be likely to refuse to be used for that purpose.