



## ANTI SLAVERY AND HUMAN TRAFFICKING POLICY

### INTRODUCTION

Modern Slavery is a term used to encapsulate two offences in the Modern Slavery Act 2015;

- Slavery, servitude and forced or compulsory labour
- Human trafficking. We have a responsibility to ensure that workers are not being exploited, that they are safe and that relevant employment, health and safety, human rights laws and international standards are adhered to, including freedom of movement and communications.

Deanston Cooper is committed to improving our practices to combat slavery and human trafficking.

### OUR BUSINESS

Our business is a construction recruitment business and recruitment agency providing recruitment services to clients across the UK.

### OUR POLICIES

We have the following policies relating to Slavery and Human Trafficking;

- Anti-Slavery Policy
- Health and Safety Policy
- Sustainability Policy
- Quality Policy

Within our Quality Management System we have a Procurement process.

### OUR SUPPLY CHAIN

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place in our supply chains.

We procure products and services in order to sustainably develop our business. The key areas of procurement are;

- I.T. hardware, software and telecommunications
- Stationary
- Office furniture
- Advertising
- Travel services

### IDENTIFICATION OF POTENTIAL RISK OF SLAVERY AND HUMAN TRAFFICKING AREAS IN THE BUSINESS

We have identified the following business areas as the most significant potential risk;

- The provision of Agency labour
- The supply chain

## The Provision of Agency Labour

- 1. The Potential Risk**  
Enslaved or human trafficked individuals are placed in work as agency labour with clients
- 2. Risk Control**  
Deanston Cooper undertakes rigorous checks on each individual including; eligibility to work, references, qualifications, Proof of NI (UK), and bank details to ensure each person is acting in their own right.

## The Supply Chain

- 1. The Potential Risk**  
The use of suppliers that contravene the Modern Slavery Act 2015
- 2. Risk Control**  
All suppliers are required to complete and return a supplier appraisal questionnaire and to commit to their adherence to the Modern Slavery Act 2015.

## DUE DILIGENCE PROCESS FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk;

- We conduct internal audits on our recruitment process to ensure that only eligible workers are engaged for agency work
- We review our supplier appraisal questionnaires as required by our Procurement Process in our Quality Management System.

## TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business and our supply chains we will provide relevant training to all staff via our induction process.

Mr R McCaig, Managing Director, has overall responsibility for Anti Slavery and Human Trafficking and to whom reference should be made in the event of any breach of this policy. Management have the responsibility for communicating and implementing this policy throughout the company and all employees are expected to act in accordance with this policy at all times.

This policy is to be reviewed annually at management review meetings.



**Russell McCaig, Managing Director**

**Date: 1<sup>st</sup> March 2016**