

# Modern Slavery and Human Trafficking Statement

## PeoplePlus Slavery and Human Trafficking Statement

We are proud of the conditions of employment for all our employees throughout PeoplePlus. Given the nature of our business, our senior management board considers that there is minimal risk approximating that, either within PeoplePlus or through our supply chains supporting our business activities, that are in any way involved in or even tangentially supportive of, or complicit in slavery and human trafficking.

The employment and procurement practices operated by the businesses within PeoplePlus ensure that we are rightly viewed as an excellent and supportive employer. And to the extent that our organisation operates as a purchaser of goods or services we expect a high level of ethical conduct from those businesses with which we do business within our supply chain.

## Organisation Structure

PeoplePlus is an employment support and training services company helping people transform their lives and businesses through work, training, education and financial services. We help people move into work by enabling them to gain the skills they need to make them employable, providing them with real work experience or helping them onto a traineeship or apprenticeship.

We do this as a prime provider on behalf of the Department for Work and Pensions and the Education & Skills Funding Agency and the European Social Fund. We also work with employers who we can offer a personalised recruitment and training solution for their business; we manage the whole process from vacancy profiling to candidate sourcing, vetting and selection.

## Our Supply Chain

Our supply chain enables us to help more people into work. Our partners are established public and private sector organisations that help us to deliver and maintain high quality job coaching, recruitment and skills development services. Before they are issued a contract to deliver on behalf of PeoplePlus they go through a robust due diligence process, where a thorough check is made of a number of areas of their business.

The aim of our partnerships is to join forces and expertise in offering a service that can seamlessly fit the needs and requirements of jobseekers, employers and skills learners alike. We work with a variety of established partners who are committed to the same high standards. This is validated through our due diligence processes and for those organisations that meet the threshold of obligations under section 54 (1) of the Modern Slavery Act 2015 we will support our partners to understand those obligations and statutory duties.

## Anti-Slavery Policy Statement

PeoplePlus has zero tolerance to slavery and human trafficking and is committed to ensuring that there is no modern slavery or human trafficking in any part of our business.

This Anti-Slavery Policy Statement is the principal articulation of the PeoplePlus stance on slavery and human trafficking. It is intended to inform and influence all the operational procedures within the organisation.

Our stated Anti-Slavery Statement 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 (amongst our other priorities) that slavery and human trafficking is not taking place anywhere in our business or related supply chains.

## Due Diligence and Implementation Processes

As part of our initiative to identify and mitigate risk (including in relation to that of human trafficking and slavery) we operate a range of policies and procedures appropriate to the different sectors of PeoplePlus. These include the policies and procedures in the following areas:

- Modern Slavery and Human Trafficking Policy
- Anti-Bribery and Corruption Policy
- Anti-Money Laundering Policy
- Supply Chain Design
- Supply Chain Review
- Consultancy Policy
- Whistle-blowing Policy
- Recruitment Policy
- Safeguarding Policy
- Prevent – Anti-Radicalisation and Extremism Policy
- Equality and Diversity Policy

PeoplePlus also articulates a series of employee rights and benefits available to employees during the employee Inductions and Welcome Events and individual contracts of employment for each member of staff.

PeoplePlus operates an HR department led by the People Director and a Governance department led by the Governance Director. Each of the Company's Directors and the Managing Director have reviewed and agreed to the terms of this statement. Each of these departments has reporting responsibilities to the Senior Management Board. A combination of procedures and functions operates to help identify, assess and monitor potential risk areas in our supply chains and mitigate the risk of slavery and human trafficking occurring in our supply chain.

## Training

We will communicate this statement to all our staff to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business and in future will include references as part of the Company's training, induction and information materials.

## Measuring Effectiveness

We believe that you can never really stop learning about the crime of Modern Slavery, although there are many more tools out there to engage with to help every business, it's an ever-evolving cycle.

Experience shows that the traffickers change their methods, the crime is hidden and not always easy to spot, and with various obstacles that we have all overcome in the last 2 years, including the 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.

### **Risk Assessments and Management**

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

Within our recruitment businesses, 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. Chairing and 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.

### **Modern Slavery and Human Trafficking Policy**

In addition to this statement, PeoplePlus also has a complete Modern Slavery and Human Trafficking Policy. Please see the policy for more details on our commitments to tackling modern slavery and human trafficking.

### **Legal and Regulatory Purpose of this Statement**

This statement is made with regard to the obligations under section 54(1) of the UK's Modern Slavery Act 2015 (the Act). Accordingly, this statement should be considered to constitute the slavery and human trafficking statement for PeoplePlus for the 2022 financial year and all future financial years until it may in future be modified or amended.



**Steven Bell**  
**Governance Director**