

## **Aqumen Policy with respect to “Tackling Modern Slavery and Hidden Labour Exploitation”**

### **Policy Statement**

*AQUMEN RECRUITMENT is a trading style of AQUMEN BUSINESS SOLUTIONS Ltd. and commits to developing and adopting a proactive approach to prevent, respond to and remediate the risks of modern slavery, forced and debt-bonded labour, human trafficking and hidden exploitation within its workplaces.*

**Modern slavery** is a broad term used to encompass offences that involve one person depriving another person of their liberty, in order to exploit them for personal or commercial gain.

**Forced labour** is all work or service that is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily.

**Debt-bonded labour** is where a person’s labour is demanded as a means of repayment for a loan or service.

**Human trafficking** is the recruitment and transportation of persons by threat, force, coercion or other abuse of power or vulnerability to achieve the consent of a person having control over another person for the purpose of exploitation.

**Hidden labour exploitation** is action up to and including modern slavery which involves the exploitation of workers and job applicants by internal or external individuals without the sanction or explicit knowledge of the employer or labour provider.

### **Scope**

This Policy applies to our Head Office at Bank House, 12 Bank Street, Castleford, West Yorkshire, WF10 1HZ and all of our client sites throughout the UK.

### **Responsibility**

Andy Taylor **Director (with responsibility for compliance)** has overall responsibility for this policy and Ellie Davies **Client Services Director** has specific responsibility for ensuring that the recruitment team are fully aware of and fully understand this policy and adhere to it fully whilst recruiting staff and fulfilling client assignments. **Recruiters and consultants** are responsible for the ethical recruitment of workers in line with this policy including in particular but not limited to adherence to the Recruiter Compliance Principles.

### **Policy Commitments**

#### **A. COMMITMENT to tackle modern slavery risks within your business**

1. These are the roles and responsibilities for tackling modern slavery risks within AQUMEN.
  - Director Compliance – responsible for:

- Policy and management systems in relation to eliminating the potential for modern slavery within Aqumen.
  - Coordination with ALP, GLAA and other external bodies
  - Advising the board and management where appropriate in relation to Modern Slavery.
  - Overseeing and Championing the “Tackling of Modern Slavery” as it applies to Aqumen.
  - Carrying out due diligence and audit and improvement of internal processes to manage the risk of “Modern Slavery” with in Aqumen.
  - Where appropriate managing the Internal Investigation, reporting and remediation of victims of suspected instances of modern slavery within Aqumen.
  - Client Service Director will:
    - Ensure that all staff adhere to the relevant management systems and policies designed to manage modern slavery within Aqumen.
    - Will support and train recruiters and consultants in the standard operating procedures created to ensure that modern slavery is prevented from entering Aqumen.
  - Recruiters and Consultants will:
    - Follow the company standard operating procedures and management systems designed to protect Aqumen and its staff from the scourge of modern slavery.
    - Understand, sign up to and adhere to the Aqumen Compliance Principles.
    - Understand and apply their understanding of the “ Labour providers good practice to identify and deter hidden Labour Exploitation”
2. This is the training that AQUMEN business undertakes to build capacity and capability to prevent and address modern slavery risks
- Director Compliance –
    - attended workshops “Tackling Modern Slavery in UK Business” July 2015
    - attended workshop “ Tackling Modern Slavery in UK Business “ 24<sup>th</sup> February 2021
    - attended workshop “ Advanced Tackling Modern Slavery in UK Business “ 25<sup>th</sup> March 2021
  - Customer Services Director –
    - Will attend workshops “Tackling Modern Slavery in UK Business” in 2021

- Consultants and Recruiters-
    - Briefed on modern slavery including:
      - Viewing video-
      - Compliance Principles
      - Awareness of “Alert Flags” and “Labour Provider Good Practice to Identify and deter Hidden Labour Exploitation”
      - Attend internal Stronger Together Briefings/Work shops
3. These are the management systems that AQUMEN has developed and implemented to prevent and address modern slavery risks at our sites.
- Key elements of the Management System are:
    - This Policy
    - Aqumen Anti-Bribery and Corruption Policy
    - Responsible Recruitment Policy
    - Recruiter Compliance Principles
    - Stronger Together embedded into electronic recruitment processes
    - Stronger Together embedded into IS9001 process including internal audit
    - From time to time Aqumen initiates external ethical audit of its systems including Complyer
    - Use of the Stronger Together “Good Practice Checklist” as a monitoring and continuous improvement tool.
    - Serious incident procedures

## **B. ASSESSMENT of modern slavery risks within your business**

- A Modern Slavery Risk Assessment process is being developed and this will be applied retrospectively to existing and all new sites.

## **C. ACTION to prevent and deal with identified risks of modern slavery within your business**

1. The following actions have been implemented to ensure ongoing Workforce Awareness Raising and Engagement to prevent and deal with identified risks of modern slavery

- Stronger Together questions in relation to payment of job finding fees and other indicators embedded into initial worker screening interview process.
  - Stronger Together leaflets embedded into electronic registration process including links to Stronger Together Video
  - Stronger Together video link and Confidential Whistle blower information part of worker Welcome Pack.
  - Recruiters and Consultants must comment on “demeanour” in relation to established indicators of modern slavery of potential workers as part of completing the registration check list which is mandatory.
  - Online questionnaires in relation to modern slavery to be sent to workers randomly from time to time as a part of ongoing due diligence.
  - Modern slavery and labour exploitation briefings to form part of worker on “site surgeries”.
  - Posters and Flyers displayed and distributed from time to time at client sites, AQUMEN head office and electronically.
2. These are the actions to ensure ongoing Supervisor/Team Leader/Support Staff Engagement to prevent and deal with identified risks of modern slavery
- Regular briefings / workshops
  - Consultants and recruiters are required to read and confirm understanding of Compliance Principles on an annual basis.
  - Stronger Together to become an agenda item in Staff KPI one to ones.
3. Outline your good practice in the recruitment of directly employed workers to prevent risks of modern slavery
- The recruitment of all directly employed staff are vetted by the MD or Director responsible for compliance.
4. AQUMEN proactively analyse worker records for modern slavery “Alert Flags” as follows:
- Recruiters are trained to spot suspicious use of the following:
    - Multiple use of same home address by unrelated workers
    - Multiple use of one bank account or third party accounts
    - Multiple use of same contact mobile number

- Systematic interrogation/analysis of data base enables suspicious use of the following to be highlighted:
  - Multiple use of same home address by unrelated workers
  - Multiple use of one bank account or third party accounts
  - Multiple use of same contact mobile number

5. AQUMEN has established the following systems to enable reporting of potential indicators of modern slavery.

- Whistle blower telephone line
- Agenda item for daily morning meeting
- Director – (Responsible for Compliance) “virtual open door” policy

#### **D. RESPONDING to protect and provide remedy for victims of modern slavery within your business**

1. AQUMEN will ensure that it responds effectively to potential indicators of modern slavery to safeguard and provide appropriate support to victims by establishing the following:

- The safety and welfare of suspected victims and other workers and Aqumen staff will be at the forefront of any response made by Aqumen to suspected instances of modern slavery.
- All suspected instances will first be reported to the Aqumen Director in charge of compliance who will oversee the situation.
- Appropriate investigations will be made where ever appropriate in partnership with the client labour user.
- Where the suspected victim(s), other workers or client or Aqumen staff are considered to be in danger or their welfare is threatened then the GLAA or Police will be informed immediately.
- All efforts will be made to deal with the matter discretely so as not to cause danger to any parties involved or to raise the alarm with suspected perpetrators before they can be properly investigated.
- All facts determined by investigation will be accurately recorded.

- In responding to suspected instances of modern slavery Aqumen will refer to advice documented in Sections 12 and 13 the “Stronger Together Tackling hidden labour exploitation toolkit” and or will take specific advice from the ALP, GLAA or Police.
2. AQUMEN will support and enable victims to receive relevant information, access to justice and reparation for harm suffered, with the objective of restoring individuals to the situation in which they would have been, had the impact not occurred. This will be pursued as follows:
- Victims will be supported by Aqumen and labour user to where ever practicable remediate them for the harm caused by instances of modern slavery.
  - Where appropriate and where necessarily authorised by the suspected victim Aqumen will contact First Responders in the form of the Salvation Army or Migrant Help to support the remediation process.

**E. MONITOR progress to prevent, respond to and remediate the risks of modern slavery within your business**

1. AQUMEN propose to monitor the progress made to prevent, respond to and remediate the risks of modern slavery within their business with regards to the workers that they supply via the following process:
- The Labour Provider Good Practice Checklist will be updated biannually as tool to monitor Aqumens progress in this matter. This will be reported in board meetings and Quality System management reviews.
2. The process for ongoing continuous improvement and for formally reviewing all procedures and arrangements will be as follows:
- The quality management system will be used to identify improvements to be implemented in the following 12 months.
  - Stronger Together becomes embedded into the Aqumen continuous improvement program.

**F. COMMUNICATE the steps that you have implemented to prevent, respond to and remediate the risks of modern slavery within your business**

1. AQUMEN communicates its efforts to prevent, respond to and remediate modern slavery risks and the effectiveness of these to relevant stakeholders via the following:
  - Aqumen will continue to be a Business Partner of Stronger Together and will upload continuously improving evidence of its commitment to Stronger Together via the on line portal.
  - Aqumen will make potential modern slavery and related issues an agenda item for client operational review meetings.

Andy Taylor Director (Responsible Compliance) Aqumen Recruitment