

Modern slavery and human trafficking statement

Introduction

This statement sets out Servoca and subsidiaries actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 October 2021 – 30 September 2022.

As part of the staffing solutions and outsourced services industry, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and operates a zero tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or in any of our supply chains.

Organisational structure and supply chains

This statement covers the activities of Servoca Plc and its subsidiaries:

Servoca operates through a number of individual trading brands, each targeted towards specific niche markets and services.

Servoca PLC operates in four primary markets:

- **Education Recruitment**
(A-Day Consultants, Classic Education & Term Time Teachers)
- **Healthcare Recruitment**
(Servoca Nursing & Care & Firstpoint Healthcare)
- **Homecare**
(Firstpoint Healthcare)
- **Criminal Justice**
(Servoca Resourcing Solutions)

Servoca delivers a wide range of specialist recruitment and outsourcing services to clients in both the public and private sectors.

- The nature of the supply chain is principally related to the provisions of recruitment and outsourcing as well as suppliers used for sourcing office equipment.

The organisation currently operates across the UK and 1 office operating outside of the UK.

- We use Risk Management processes to assess which of our own activities and supply chains represent the highest risks in respect of slavery or human trafficking in particular, geography, sector and cost of supply.

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.

Other relationships

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

- *Care Quality Commission (www.cqc.org.uk)*
- *The Recruitment and Employment Confederation (www.rec.uk.com) and the Institute of Recruitment Professionals (www.rec-irp.uk.com)*

Responsibility

Responsibility for the organisation's anti-slavery initiatives is as follows

- **Policies:** Reviewing and putting in place the relevant policies in relation to slavery and human trafficking is the responsibility of the Directors within each part of the business.
- **Investigations/due diligence:** The Directors are responsible for compliance in their respective business units and for their supplier relationships.
- **Training:** We will provide training to relevant members of staff at induction and throughout employment where relevant to ensure that they understand the risks of modern slavery infiltrating our business or supply chains. Effective operation of our policies and procedures are aimed at mitigating this risk.

Relevant policies

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations

- **Whistleblowing policy** The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking or prohibiting of freedom, association or movement. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- **Employee code of conduct** The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Recruitment/Agency workers policy** The organisation uses only specified, reputable employment businesses and agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. It must be explicit that they prohibit the use of worker-paid recruitment fees.

Examples of Modern Slavery

The International Labour Organization (ILO) list of the most common signs of forced labour include:

- Restriction of movement
- Abuse of vulnerability
- Deception
- Isolation
- Intimidation and threats
- Withholding wages
- Abusive working and living conditions
- Physical and sexual violence
- Retention of identity documents
- Excessive overtime
- Debt bondage

Due diligence

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- Mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- Evaluating the modern slavery and human trafficking risks of each new supplier;
- We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.
- Engage with our suppliers both to convey to the Anti slavery and human trafficking policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses;
- Where possible we build long standing relationships with suppliers and make clear our expectations of business behaviour;
- Audits of suppliers in relation to modern slavery with regards to freedom of association, movement or employment, harsh or inhuman treatment and human trafficking;
- Terms of business with suppliers include a modern slavery clause to match our organisations policy;
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

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.

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

- We reserve the right to conduct spot-checks of the business who supply us, in order to investigate any complaints
- We require the business we work with to address modern slavery concerns in their policies
- 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.

Communication and awareness of this policy

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

The policy will be communicated to all employees across the business and training provided where appropriate. Employees will be expected to familiarise themselves with the statement.

The Company statement will be communicated on our company website and intranet page.

Signed: 

Name: CHRIS HINTON

Position: CFO

Date: 21st September 2021