

Modern Day Slavery Policy

UK & Ireland

This policy is non-contractual and does not form part of your terms and conditions of employment and may be varied or withdrawn at any time without notice.

Introduction

The Modern Slavery Act 2015 makes it a criminal offence in the UK to hold a person as a slave or servitude or to force an individual to perform forced labour.

We take an absolute zero tolerance on these inhumane practices in both the UK and Ireland. As a recruitment business, we need to be vigilant to ensure that we do not unknowingly place modern slaves into temporary assignments.

Scope

All colleagues, UK and Ireland Only.

Policy

There are examples in the UK and Ireland where individuals (Gangmasters) seek vulnerable people and force them into work which they are charged for, with often the majority, if not all, of the salary being paid to the Gangmaster.

We need to be vigilant that we do not inadvertently “support” these practices. There are some warning signs which may lead us to believe that there are organised Gangmasters within our business:

- An individual tries to register on behalf of another individual(s) for low skilled work and provides their mobile number as the point of contact. Often this is claimed to be as the candidate does not speak English.
- The candidate’s bank details are that of another person.

Of course the above does not always mean that our candidate is in a modern slave situation, and there are likely to be a number of other warning signs which should be flagged to us, so we ask that you remain vigilant and apply your common sense.

We do on a periodic basis review our payroll file to identify where wages are being paid to another individual and this is discussed on a case by case basis.

Supply Chain

We expect any business we partner with to hold the same high standards in relation to slavery as we do. Any new suppliers on-boarded to Kelly will be asked to complete a questionnaire on what they do to prevent modern slavery within their organisation and

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supply chain.

We will not work with any supplier where we have reasonable belief that they do not work to the same ethical standards which we observe.

Process

If you have any concerns that one of your candidates is potentially a modern slave or you have a suspicion that a supplier we are using is knowingly or unknowingly involved in modern slavery, this should be reported immediately to the HR team.