



Company Name	Highgrade Recruitment LTD
Document	Modern Day Slavery
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Version	2



Modern Slavery Policy

1. Highgrade Recruitment LTD is committed to eliminating modern slavery, human trafficking, forced labour, and similar human rights abuses.
2. Highgrade Recruitment LTD is committed to ensuring that its staff and any workers it supplies (directly or indirectly) are not subject to behaviour or threats that may amount to modern slavery, human trafficking, forced labour, and similar human rights abuses.
3. Highgrade Recruitment LTD provides appropriate training and awareness information for all of its staff. In particular:
 - Our recruiters undertake training courses that include guidance around modern slavery and human trafficking, as well as other wider human rights issues.
 - All of our staff receive awareness-raising information around issues involving modern slavery and human trafficking, so that they can bring any concerns they have to the attention of management.
4. Any staff, workers or other parties are strongly encouraged to report any concerns or suspicions that they might have to Claire James.
5. Reports surrounding these issues are taken extremely seriously by senior leadership team who are committed to ensuring that all investigations shall be prompt and effective. If our investigations reveal any issues, we are committed to taking appropriate action, including but not limited to:
 - Working with the appropriate organisations to improve standards,
 - Removing that organisation from our preferred supplier list,
 - Passing details to appropriate law enforcement bodies.
6. We regularly monitor our risks in this area through the use of relevant key performance indicators, including:
 - The amount of time spent on audits, re-audits, spot checks, and related due diligence, and
 - The level of modern slavery training and awareness amongst our staff.
7. As part of our efforts in this area, we publish a modern slavery statement on an annual basis.
8. We would also recommend reading this in conjunction with our other policies, including our:
 - Corporate social responsibility policy,
 - Ethical procurement policy,
 - Anti-bribery / corruption policy, and
 - Whistle-blowing policy.

This policy was adopted on 18/12/2018 after being agreed by our board of directors. It is reviewed annually.



Modern Slavery Statement

This statement is made as part of Highgrade Recruitment LTD's commitment to eliminating the exploitation of people under the Modern Slavery Act 2015 (the Act). It summarises how Highgrade Recruitment LTD operates, the policies and processes in place to minimise the possibility of any problems, any risks we have identified and how we monitor them, and how we train our staff.

This statement is published in accordance with section 54 of the Act, and relates to the financial year April 2018 to April 2019. It was approved by the board of directors on 18/12/2018.

Claire James
Manager

Our Business

Highgrade Recruitment LTD is a limited company operating in the recruitment sector. We supply temporary workers in the education sector.

Highgrade Recruitment LTD is an independent business.

Who we work with

All the hirers that we work with, and all of the work-seekers we provide, are known to and identified by our staff. All the temporary workers we supply are identified by our staff. We do not supply work-seekers to hiring companies through any intermediaries.

The hiring companies that we work with are located across South Wales. The work-seekers we supply live across South Wales

Other relationships

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

- the Recruitment and Employment Confederation (www.rec.uk.com) and the Institute of Recruitment Professionals (www.rec-irp.uk.com)

Our Policies

Highgrade Recruitment LTD has a modern slavery policy

In addition, Highgrade Recruitment LTD has the following policies which incorporate ethical standards for our staff.

- Whistleblowing.
- Complaints policy and procedure.
- Customer Service.

Policy development and review



Highgrade Recruitment LTD's policies are established by our directors, based on advice from HR professionals, industry best practice and legal advice. We review our policies annually, or as needed to adapt to changes.

Our Processes for Managing Risk

In order to assess the risk of modern slavery, we use the following processes with our suppliers:

- When engaging with suppliers, we ask for evidence of their processes and policies, including commitments around modern slavery, human trafficking, forced labour, human rights, and whistleblowing.
- We review the potential for risk at regular intervals, including the possibility of re-auditing a supplier or conducting spot checks.

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 businesses who supply us, in order to investigate any complaints.
- We require the businesses 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.
- We ensure that all of our suppliers are members of appropriate industry bodies and working groups.

Our staff are encouraged to bring any concerns they have to the attention of management.

Our Performance

As part of monitoring the performance of Highgrade Recruitment LTD, we track the following general key performance indicators:

- The speed with which you investigate related complaints.
- The level of compliance and transparency we have established in our supply chain.
- The level of training amongst our staff.

Based on the potential risks we have identified, we have also established the following key performance indicators, which are regularly assessed by our board of directors:

- the percentage of candidates supplied from audited businesses / our preferred supplier list
- the effectiveness of enforcement against suppliers who breach policies
- the amount of time spent on audits, re-audits, spot checks, and related due diligence
- the level of modern slavery training and awareness amongst our staff

We carefully consider our indicators, in order to ensure that we do not put undue pressure on our suppliers that might increase the potential for risk.



Our Training

All of our staff receive training and support that is appropriate to their role. In particular:

Our recruiters training courses that include guidance around modern slavery and human trafficking, as well as other wider human rights issues.

- All of our staff receive awareness-raising information around issues involving modern slavery and human trafficking, so that they can bring any concerns they have to the attention of management.

As part of this, our staff are encouraged to discuss any concerns that they have.

Training is refreshed annually



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