

# 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 within PeoplePlus and having assessed our supply chain using the Interactive Map for Business of Anti-Human Trafficking Organisations and internal assessments we believe this risk to be minimal throughout our supply chains 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.

### About Us

PeoplePlus is one of the leading adult skills and training providers in the UK, delivering adult education, prison education, skills-based employability programmes and support to enable people to live independently across the country.

Skills and training – market leading provider of adult education supporting people into training and ultimately back in to work. Offering training to individuals as well as businesses who are looking to up-skill their workforce.

Justice and Community – largest independent provider of education and training services for prisoners and ex-offenders, as well as individual support services for carers and people with disabilities, both at home and in the workplace.

Employability – market leading provider of programmes providing back-to-work education, skills support services to the unemployed and enterprise advice to individuals wanting to start their own business

### Organisation Structure

PeoplePlus is part of The Staffline Group which has 4 divisions: Staffline Recruitment GB, Datum RPO, PeoplePlus, and Staffline Recruitment Ireland. Brightwork operates in Scotland as a subsidiary of Staffline Recruitment GB, and Omega, Techsearch, and A La Carte operations are trading names of Staffline Recruitment GB.

For more information on the structure of Staffline Group Plc, [click here](#).

We consult internal experts across the Staffline Group to ensure joint consensus in the approach to tackling Modern Slavery. As a wider organisation we are actively involved with NGO's and Anti-Slavery Networks across the country and review the Ethical Trading Initiatives evaluation framework, the ILO indicators of Modern Slavery and UN Guiding Principles when developing our Modern Slavery Statements.

### 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, and these are reviewed and updated regularly. 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
- Partner Management Framework - Design
- Partner Management Framework - Review
- Whistle-blowing Policy
- Recruitment Policy
- Safeguarding Policy
- Prevent – Anti-Radicalisation and Extremism Policy
- Equality and Diversity Policy

PeoplePlus articulates a series of employee rights and benefits available to employees during employee inductions, 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 Group Managing Director have reviewed and agreed to the terms of this statement. Each of these departments has reporting responsibilities to the Senior Management Board, which has approved this Modern Slavery Statement.

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 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 will include references as part of the Company's training, induction, and information materials.

Training and awareness materials are readily available to all permanent members of staff so that their

continuous professional development can be supported; training topics include safeguarding, whistleblowing, reporting on incidents, and how to spot the signs of Modern Slavery and Human Trafficking.

## **Measuring Effectiveness and Implementing Performance Indicators**

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 is 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.

To measure our impact this year we will:

1. **Supplier Engagement:** Monitor the percentage of suppliers engaged in discussions or training/commitments related to modern slavery prevention.
2. **Training and Awareness:** Log the number of employees accessing modern slavery training/awareness materials.
3. **Investigations:** Record the number of incidents and investigations conducted into reported cases of modern slavery, including internal and external investigations.

## **Risk Assessments and Management**

At PeoplePlus, we understand that at times we will engage with other recruitment partners through our Social Recruitment Framework to assist with the supply of candidates 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. 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.

We have assessed our risk as low utilising the Interactive Map for Business of Anti-Human Trafficking Organisations and internal assessments. This will be continuously monitored to identify any new potential risks.

To fulfill our commitment, we will:

1. Conduct due diligence to identify and assess potential modern slavery risks in our operations and supply chains.
2. Take appropriate action to address any identified risks and work with our suppliers and partners to improve their practices.
3. Provide access to training materials and collateral to increase awareness of modern slavery and how to identify and report any potential cases.

4. Encourage and support the reporting of any suspected cases of modern slavery and human trafficking.
5. Regularly review and monitor our policies and practices to ensure that they remain effective in preventing modern slavery and human trafficking.

We are committed to continuously improving our efforts to prevent modern slavery and human trafficking and to complying with all relevant laws and regulations.

### **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 2023-2024 period until it may in future be modified or amended.



**Steven Bell**  
Governance Director