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# MODERN SLAVERY ACT COMPLIANCE STATEMENT

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This statement has been published in line with the requirements of the Modern Slavery Act 2015 and sets out the Company's position on the prevention of modern slavery and human trafficking for the financial year ending December 2018. It was approved by the Board of Directors in March 2019.

Name: Damian Whitham

Signature: 

Commercial Director

## Our Business

Brook Street is a limited company operating as both an employment agency and business in the UK. We are a subsidiary of ManpowerGroup.

Brook Street was founded in 1946, operating solely within the UK providing temporary and permanent recruitment services. We specialise in office based and light industrial workers across all industry sectors. Our workforce is therefore not only made up of our permanently engaged employees but also our registered work-seekers.

All the clients we work with and all the work-seekers we provide are known to and identified by our staff. The hiring companies that we work with are all located in the UK. The work-seekers / workers we supply live in the UK.

## Our Policies

As a company we have the following relevant policies in place:

- Modern Slavery and Human Trafficking Policy
- Fair Labour Practices – worker questionnaire (anonymous)
- Whistleblowing Policy
- Employee Guide to the Code of Conduct – Our Principles of Ethical Business Conduct
- Corporate Social Responsibility Policy
- Supply Chain Business Partner Policy
- Ethical Purchasing Policy

These policies are available to all employees on the Company intranet and are first introduced as part of their initial on-boarding induction when joining the Company.

Brook Street's policies are established by our Board of Directors, based on advice from HR professionals, industry best practice and legal advice. We review our policies on a regular basis and as needed to adapt to changes.

## Our Processes for Managing Risk

Our standard practices are designed to protect and promote human rights and fair labour practices throughout the recruitment, selection and employment of both our employees and the work-seekers we place with our clients. Brook Street operates within appropriate recruitment legislation.

- Our Compliance and Audit Team carry out regular audits of our branch network. These audits include establishing we hold appropriate eligibility to work documentation, proof of national insurance numbers, references and qualifications (as relevant) for all our temporary workers.
- Our Payroll Department carries out regular checks on our worker-seekers' bank details to identify where individuals may be sharing bank accounts, or addresses, as this could be an indication of illegal behaviour.

- All worker-seekers have on-line access to their weekly pay records allowing them to view all deductions we legally make from their salaries.

Branches supplying into sectors with a higher risk of modern slavery being present display Stronger Together leaflets and posters.

## Due diligence

A commitment to human rights, fair labour practices and ethical business dealings is essential to our principle-based culture.

Brook Street:

- is a member of the Recruitment and Employment Confederation (REC) and has representation on the Employment Policies Committee.
- has held a corporate Gangmasters licence since the inception of the Gangmasters and Labour Abuse Authority (GLAA) (formally known as the GLA) which was formed as an independent body arising out of the Gangmasters (Licensing) Act 2004. Its Mission Statement is to work in partnership to protect vulnerable and exploited workers
- is part of the group of organisations that founded SAFERjobs (Safe Advice for Employment and Recruitment). This is a Recruitment Industry Counter-Fraud Forum, which is a non-profit making organisation created to raise awareness and combat criminal activities that may be attempted on those within the industry or through the services provided by the industry. SAFERjobs works with the Metropolitan Police, Business, Energy & Industrial Strategy (BEIS), Department for Work and Pensions (DWP), Trading Standards, City of London Police, recruitment industry trade associations and private sector recruitment businesses.
- seeks positive assurance, within our UK supply chain, that they agree to comply with the principles of our Corporate Social Responsibilities Policy, which forms part of the contract with our supply chain. Where appropriate, we carry out due diligence on prospective suppliers, as well as auditing existing and prospective suppliers about legal and contractual compliance.
- takes a risk-based approach to addressing concerns that may arise from our supply chain. We expect all suppliers to operate in accordance with our Supply Chain Business Partner Policy. We procure that our supply chain disseminates these terms down to their own suppliers and subcontractors.

## Our Performance

There haven't been any breaches of the Modern Slavery Act reported during 2018.

We review our policies and procedures on a regular basis to ensure not only ongoing compliance to our standards but that our supply chain shares the same principles and commitment to the Modern Slavery Act.

## Training

Our Code of Business Conduct and Ethics provides guidance to all our staff on the conduct of our business according to the highest moral standards. The Code and our other ethics policies help to focus our staff on the areas of this type of risk. It offers guidance in recognising and dealing with any ethical issues and provides mechanisms to report unethical conduct without fear of retaliation.

Our code provides a compliance hotline for employees to inform (on an anonymous basis) any concerns with activities of the Company or the supply chain.

All staff are required to complete the **Business Conduct and Ethics training and certification** annually to build their training and knowledge.

Additionally, where we have supply arrangements in a sector where the use of modern slavery practices have been evidenced (e.g. food pickers and packers), we have introduced further training from **Stronger Together** for the recruitment teams involved.