

DATED 16/04/2020

**VOLUNTARY SLAVERY AND
HUMAN TRAFFICKING STATEMENT**

Glu Recruit Limited



INTRODUCTION

Section 54 of the Modern Slavery Act 2015 (“the Act”) requires any commercial organisation that supplies goods or services, carries on a business or part of a business in the UK, and whose annual turnover is £36 million or above, to produce a statement for each financial year.

Glu Recruit Ltd (“Glu Recruit”, “we”) has an annual turnover of less than £36 million. However, we have chosen to make this voluntary statement under section 54 of the Act to show our commitment to ethical trading principles and to set out the steps we are taking to tackle modern slavery and human trafficking in our business and in our supply chains.

STRUCTURE AND SUPPLY CHAINS

Glu Recruit is a specialist recruitment agency that places high calibre candidates at all levels into permanent and temporary roles throughout Yorkshire and the Midlands.

As a specialist recruitment agency, our permanent workforce consists of office-based workers including recruitment consultants, and administrative staff. As of March 2020, we had seven employees working at our offices based in Rotherham. We also engage and supply numerous temporary agency workers across a range of disciplines, including office support, sales and creative roles.

Our supply chain consists of goods and services procured to enable us to provide our recruitment services. Our relationships with employers, sub-contractors, business partners and other third parties include training providers, IT support, facilities management services, utility providers and payroll.

DUE DILIGENCE AND RISK ASSESSMENT

We understand the inherent risks associated with the recruitment sector in relation to modern slavery and human trafficking. These risks are the result of various factors, such as a high turnover of workers and the often-limited face-to-face contact that we have with our candidates. To mitigate these risks, we apply stringent checks in order to verify every applicant’s identity and their right to work in the UK before we enter into any employment relationship with them. This includes requesting proof of identification (including name, date of birth and address) and thoroughly checking the information provided in their application form. Any data that we collect in respect of the applicant is

then securely uploaded on to our IT system and reviewed against the details provided by other applicants for suspicious patterns (such as repeated addresses or bank details).

Following the initial verification stage, we have in place additional protective measures to check an applicant's identity and the authenticity of the information that they have provided. These include:

- Conducting face-to-face interviews with the applicant
- Asking the applicant how they came to apply to Glu Recruit
- Only corresponding directly with the applicant and not through a third party
- Making additional enquiries in the event that suspicious payment details are provided (such as where we are instructed to make payment into a non-personal bank account or the account of another third party)

To help identify and monitor the risk of slavery and human trafficking in our supply chain, we ask appropriate questions of our suppliers, such as the steps taken to prevent and detect modern slavery and human trafficking. We also aim to include anti-slavery and human trafficking provisions in all our contracts with suppliers and keep our contracts under regular review.

POLICIES AND STAFF TRAINING

Our commitment to preventing and tackling modern slavery and human trafficking is underpinned by our internal policies and practices, which reflect our commitment to acting ethically and with integrity in all our business relationships. This includes our **Whistleblowing Policy**, which enables our staff to confidentially report any concerns surrounding modern slavery and human trafficking in the knowledge that their concerns will be taken seriously and appropriately dealt with; and our **Anti-Corruption and Bribery Policy**, which sets out our internal rules for employees dealing with third parties on our behalf.

All of our employees are made aware of our policies and procedures relating to modern slavery and human trafficking (including those highlighted above) and have an explicit responsibility for upholding them. To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we also provide our employees with regular training. This includes training on how to detect and prevent possible instances of modern slavery and the procedure for reporting any concerns. Our Managing Director has responsibility for ensuring our staff training is kept up to date and our internal policies and procedures are also kept under regular review.

MEASURING EFFECTIVENESS

Despite the stringent measures that we have in place, we are yet to report any instances of modern slavery or human trafficking in our workforce or supply chains. However, we are aware that modern slavery and human trafficking can happen at any time and remain vigilante to this prospect. This means keeping our policies and activities under regular review and exploring further steps that we can take to combat modern slavery and human trafficking (see below).

FURTHER STEPS

We will review the effectiveness of our steps as listed under the heading “due diligence and risk assessment” to ensure that there is no slavery or human trafficking in our supply chains or workforce. We intend to review these actions and take further steps in the following instances:

- (a) Where we are on reasonable suspicion of an act of modern slavery or human trafficking in our workforce or supply chain. Where such suspicion arises we will enact further steps in the following two instances:
 - (i) following making a report to the proper authorities we will review the steps taken to ensure they are effective;
 - (ii) where a report is not warranted we will consider further steps as appropriate.
- (b) Following a period of 5 years from the approval of the statement and each 5 year period thereafter.

APPROVAL OF THIS STATEMENT

This voluntary modern slavery and human trafficking statement is made in connection with section 54(1) of the Modern Slavery Act 2015, following the financial year ending 30th June 2019. It was approved by the board on 16th April 2020.