



HEADS
RECRUITMENT

PART OF THE **PROMAN** GROUP
RECRUITMENT

Tackling Modern Slavery Policy 2017

1. HEADS Recruitment Ltd is committed to eliminating modern slavery, human trafficking, forced labour, and similar human rights abuses.
2. HEADS 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. HEADS Recruitment Ltd provides appropriate training and awareness information for its entire staff. In particular:
 - Our leadership team receive detailed training in identifying and resolving concerns around modern slavery and human trafficking.
 - All of our staff receives 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 the Patrick Ramsdale, the Legal & Compliance Director.
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,
 - 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 (*available in Resources / Company Policies*)
 - Anti-bribery / corruption policy (*available in Resources / Company Policies*)

This policy was adopted on 10th January 2017 after being agreed by our board of directors. It is reviewed annually.

Signed:

Patrick Ramsdale
Legal & Compliance Director