

## Modern Slavery Statement 2021

This statement refers to the financial year ending 31st December 2020 (updated January 2021 and September 2021) and details the steps taken by The Recruitment Co. to prevent modern slavery and human trafficking in our business and supply chains.

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## Introduction

This statement covers the activities of Twenty20 Capital Bidco 1 Limited, trading as the Cordant Group, and the trading subsidiary companies listed below:

- The UK Recruitment Co.

It has been published in accordance with the Modern Slavery Act 2015 and details the action taken by us to prevent and combat modern slavery and human trafficking within our business and supply chain. This is our fifth annual statement.

Modern slavery is a crime and a violation of fundamental human rights which is estimated to affect c.21 million victims worldwide. It takes various forms; slavery, servitude, forced and bonded labour; and human trafficking; all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

In 2020, 10,613 potential victims of modern slavery were referred to the NRM; a similar number to 2019<sup>1</sup>. The plateau in numbers is primarily thought to result from the Covid-19 pandemic and associated restrictions. PMP Recruitment recognises the need to raise awareness and to be proactive in working to prevent all aspects of modern slavery.

We have a zero-tolerance approach to modern slavery and expect all who have, or seek to have, a business relationship with Cordant, to familiarise themselves with our anti-slavery and human trafficking policy and to act at all times in a way which is consistent with this policy.

We are committed to acting transparently, ethically and with integrity in all our business transactions and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or in our supply chains.

We believe in a society united by shared opportunities where everyone can maximise their potential.

## Our Business

We provide recruitment services, supplying temporary labour and managed service solutions we're experts in peak productivity management, as well as permanent hires. We blend our experience with industry knowledge and digital capabilities to create seamless processes which boost performance and profitability.

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<sup>1</sup> [National Referral Mechanism Statistics 2020](#) - annual figures published March 2021

Our mission is to attract and retain the best job-seekers, manage successful recruitment campaigns, and to be a sustainable business.

## **Our Supply Chains**

Our supply chains are limited to those individuals and organisations who provide Cordant with the goods and services needed to operate its business, such as the sourcing of materials, stationery, workwear, PPE, cleaning materials, telecoms and IT equipment; and other materials principally related to the provision of our services, security, cleaning, recruitment, integrated services and installation and maintenance.

## **Our Policies in relation to Modern Slavery**

Our commitment to ensuring that Modern Slavery is eradicated and exposed is supported by a suite of policies and processes including the following:

- Anti-Slavery & Human Trafficking Policy
- Ethical Worker Sourcing and Supply Policy
- Whistleblowing Policy
- Supplier Code of Conduct
- Eligibility to Work Standard Operating Procedure
- Payroll Standard Operating Procedure

We have developed our policies and procedures in alignment with the following six UN Sustainable Development Goals:

- No Poverty
- Good Health and Wellbeing
- Quality Education
- Good jobs and economic growth
- Reduced Inequality
- Responsible consumption

These policies and processes are informed by internationally recognised standards and declarations;

- The Base Code of the Ethical Trading Initiative
- The UN Universal Declaration of Human Rights
- The International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work
- The UN Guiding Principles on Business and Human Rights

Colleagues are encouraged to report concerns using the available reporting channels, all reports are investigated and if applicable the relevant authorities contacted. colleagues that report concerns whether openly or confidentially, are taken seriously and receive full protection under our Whistleblowing Policy. All policies are available on our intranet.

Alternatively, for more information or guidance, or to report a case of modern slavery, we advise that suppliers and colleagues can contact Unseen / the government's Modern Slavery Helpline on 08000 121 700 should they wish.

### **Tackling Modern Slavery - Our Business**

We have focussed our efforts in raising awareness of the issue amongst our temporary workforce by providing information to all workers registering with us and supporting those affected, or potentially affected by modern slavery, and promoting and supporting modern slavery charities and the work they do to help the survivors of this crime.

We have undertaken a risk analysis of all our brands, this identified that PMP Recruitment faced the highest risk of modern slavery due to the volume of temporary colleagues working.

In order to raise awareness we have and continue to;

- Provide Modern Slavery training for all front line colleagues
- Provide Modern Slavery training for clients (as requested)
- Display and promote the Modern Slavery Helpline & Stronger Together - online, on our intranet, via training and worker communications, handbooks and visual materials in our locations
- Publish details of the Confidential Helpline on our payslips
- Use systems to prohibit colleagues using bank account that is not in their own name, unless proof of relationship with the account holder can be established
- Use systems and checks to monitor and flag high multiple use of the same home address

### **Stronger Together**

We are Stronger Together Business Partners. This is a multi-stakeholder initiative aimed at reducing modern slavery, particularly within labour supply chains. The following group companies are Stronger Together Business Partners:

- The Recruitment Co. - provides recruitment services to over 2000 customers across the UK

All have uploaded evidence to publicly demonstrate their commitment to tackling hidden labour exploitation.

### **Our Training and Due Diligence**

To ensure a high level of understanding of the risks of modern slavery and human trafficking we have mandatory e-learning for all of our colleagues involved in recruitment or the management of our supply chain. All frontline recruiters complete training and acknowledge their understanding via our Recruiter Compliance Principles.

We raise awareness of modern slavery issues by publishing and emailing our Modern Slavery Statement to all colleagues and our intranet, this is recommunicated annually. We have also developed and launched dedicated Tackling Modern Slavery resources within our intranet.

This is available to all colleagues and includes all training assets, policies and information on how to report any suspected / confirmed instance of modern slavery.

We have a half day Modern Slavery workshop available for colleagues and clients (on request) which covers:

- What modern slavery, human trafficking and bonded and forced labour are
- The benefits for tackling modern slavery to the individual, the team and the business/industry
- The impacts of modern slavery through examples
- How to deter and detect hidden exploitation including spotting the signs
- How to protect potential victims and evidence

### **Tackling modern slavery - our supply chains**

All suppliers are issued with a copy of our Modern Slavery Statement and our Supplier Code of Conduct, this is communicated at the beginning of our business relationship and reinforced as appropriate thereafter.

We expect the same level of commitment and high standards in tackling modern slavery from suppliers, contractors and business partners and as part of our contracting processes we will review evidence of their commitment to tackling modern slavery and expect all our suppliers to hold their suppliers to the same high standards.

### **Our Commitment and Raising Awareness**

This policy reflects our continue commitment to providing training to increase awareness, enforcing processes and controls to ensure slavery and trafficking are not occurring in our business and supply chains. During the course of 2020;

- 152 permanent colleagues completed our online Modern Slavery training
- We provided Stronger Together information to all new applicants via posters, web links and in worker handbooks
- 7 potential cases of exploitation were spotted and highlight to the authorities
- Issued our updated supplier code of conduct throughout our supply chain

### **Impact & Monitoring**

We report quarterly to our individual brand SMT and Executive teams on:

- Number e-learning modules completed
- Workshops delivered and attendee numbers
- Confidential helpline calls identified as potential Modern Slavery
- Any engagement with GLAA, Police or NCA
- Any NGO / government engagement relating to Modern Slavery
- Number of multiple occupancy addresses identified
- Number of shared bank accounts identified

- Number of clients influenced to consider Modern Slavery as a risk in their supply chain
- Number of duplicate “Next of Kin” details identified

### **Our Plans for 2021**

We are committed to reviewing and improving what we do each year to prevent modern slavery and human trafficking. Our 2021 initiatives will continue to build on our work and will target brands in order, as identified in our risk analysis. This year we will continue to:

- Ensure that all frontline recruiters and site teams in all brands are aware of the tools available to them including the Modern Slavery intranet
- Work with clients to provide support and guidance to limit risk
- Work with government and NGOs to develop strategies to remove risk from the sectors we operate in
- Increase internal awareness on identifying and reporting incidents of modern slavery and human trafficking and we will improve by:
  - Providing reminders and training utilising technology
  - Review our upwards supply chain to ensure Modern Slavery statements are available

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our modern slavery statement for the financial year ending December 2020.



29/01/2021

**Jamie Reynolds**  
**Group Chief Executive Officer**

**Date**

Signed on behalf of the Board of Directors of Cordant, who have read and authorised the publication of this statement

Further information on modern slavery:

<https://www.unseenuk.org/modern-slavery/facts-and-figures>

<http://www.nationalcrimeagency.gov.uk/publications/national-referral-mechanism-statistics>

<http://www.gla.gov.uk/>