

Ignition Driver Recruitment Modern Day Slavery Statement

Slavery, servitude, forced labour and human trafficking (modern slavery) are issues of increasing global concern, affecting all sectors, regions and economies. Modern slavery is fundamentally unacceptable within our business and supply chains and is an important element in our overall approach to business and human rights. Ignition Driver Recruitment are committed to respecting, protecting and championing the human rights of all those who come into contact with our operations, including employees, temporary workers, customers and local communities. We accept our responsibility to support transparency and honesty; to find and resolve problems, and to work with others to protect the rights of workers, particularly those who are most vulnerable to abuses such as modern slavery.

This statement has been published in accordance with the Modern Slavery Act (2015). It sets out the steps Ignition Driver Recruitment will take during the year, ending 30th April 2020 to prevent modern slavery in our business operations and supply chains.

About Ignition Driver Recruitment

Ignition Driver Recruitment are a temporary recruitment agency offering flexible recruitment solutions across various sectors within the logistics industry supporting staffing requirements across, warehousing & Industrial, HGV driving, home delivery logistics and administration and support.

Our largest peak period of recruitment runs from September to December whereby we require considerable additional resource for the seasonal Christmas period aligned with the logistics industry. Other peak periods of the year are at Easter and the summer months where we see an increase in the need for temporary labour supply within our client operations.

Policies & Contractual Controls

Ignition Driver Recruitment has several policies and controls which govern our modern slavery statement, of which all employees, suppliers and business partners adhere to. Set policies are included in our employee handbook which is provided to all new starters on week one of starting an assignment or employment with us. Our business policies are also available for permanent employees on our internal HR portal for all to view.

Ignition acts to embed a culture of trust where workers are valued and treated with dignity and respect and can raise issues without fear of retribution.

- Anti-Slavery and Human Trafficking Policy
- Recruiter Compliance Principles (Permanent employees)
- Whistle Blowing Procedure, Equality Act opportunities and employee code of conduct (Employee Handbook)
- Terms of Business, Supplier Contracts and Client Agreements (Containing specific clauses relating to anti-slavery and human trafficking which interlink with our policy)
- GLAA licence holder showing full compliance standards

Ignition Driver Recruitment are also members of Stronger Together, a business-led multi-stakeholder initiative working to reduce modern slavery particularly hidden forced labour, labour trafficking and

other third-party exploitation of workers. We use their expertise and resources to support us in implementing policy and control within our operations.

Due Diligence & Risk Assessment

Ignition recognises that there is a risk of modern slavery in any area of our business where there is:

- Migrant Labour (Country to country or within a country)
- High presence of refugees and European workers
- Women workers
- Outsourced labour supply functions (2nd Tier suppliers)

Ignition's Directors and the Modern Slavery Committee are responsible for ensuring Ignition meets its human rights responsibilities.

The modern slavery committee consists of our head of operations from each area of the UK across all contracts, the Compliance & HR Department (including HR Director) and the advertising and marketing team. The committee meet on a quarterly basis to discuss the following:

- Preventions of modern slavery in supply chain (looking at start to end, e.g. job boards, 2nd tiers, refer a friend schemes to placement and thereafter)
- Eliminating modern slavery in our business
- Modern Slavery client commitment and partnership
- Issues and concerns seen in the business and/or within the local areas and community
- Actions from previous quarter
- Actions for next quarter

We continue to monitor, evaluate and address any risk of modern slavery through the following methods: –

- During the recruitment process, our temporary employees are taken through an induction which includes information, guidance and a video on modern slavery, including the importance of reporting any suspicion to team leader and managers
- We display Modern Slavery posters either branded by the GLAA, Stronger Together or Ignition Driver Recruitment across all branches and on-site warehouses (including in private areas such as toilets, canteens and locker rooms) to raise awareness
- We promote through all operations a trusted communication method which links directly to our HR department through our management team.
- Our HR department hold regular "HR Surgeries" at each of our client warehouse locations which allow individuals to speak to HR on a confidential basis, at a time that suits them, raising any issues or concerns to improve worker In addition to this, the team also do floor walk arounds which allow workers to speak to HR on an informal basis, building a relationship with each worker to encourage day to day discussions.
- On a monthly basis, we run a HR report that determines where we have duplications in our employee records. We particularly look for where workers are sharing living arrangements, telephone numbers, and next of kin details. Our sites are also tasked to detect multiple occupancy during a registration or interview session with workers and highlight this to the HR department immediately. If we determine an employee to be "high risk" we conduct a Modern Slavery Risk Assessment, which is completed by our on-site team. This assessment is

also used in any instances where we feel we need to investigate potential cases of modern slavery.

Since last year we have implemented a number of new initiatives which embed respect for human rights and zero tolerance of modern slavery across the business.

Key Areas of Improvement in 2019/20

- Supporting Modern Slavery Charities (charity events/raising awareness/raising funds/building partnerships)
- “Know your employees” expanding on day to day relationship building with temporary employees to improve welfare. Opening discussions that may highlight exploitation or mental health issues.
- Annual refresher training with all permanent employees, providing case studies and lessons learnt including our action plan for 2019/20 contained in the annual Modern Slavery Statement.
- Multi-Lingual briefings surrounding modern slavery to be conveyed quarterly across temporary workforce (mixture of all nationalities)
- Translation of policies and employee handbooks for temporary and permanent workforce
- Implement “Text Aid” service nationally across all client sites and internal branches
- Promotional campaign to be ran on world Modern Slavery where we hold a specific Modern Slavery open day on the 18th October 2019 at each of our sites. The promotion will also consist of text & email campaigns and leaflet distribution. We are looking to also work with an expert on this day, that can be a key support function on the HR surgery talks with our employees.

Action

Throughout the course of 2018 we have worked with a GLAA Officer focusing in the Mansfield, Nottinghamshire area. Within our partnership throughout the year, we identified and provided evidence for 7 cases of Modern Slavery within the local area. On the back of our joint approach, there were 2 arrests made. Since working with the GLAA officer, we have made the following changes:-

- Consultants and account managers are required to understand and sign the companies Recruitment Compliance Principles
- Business cards are provided to “at risk” workers containing a confidential direct HR contact and the clients Welfare Officer
- ID must be seen at registration and then again on first day at induction to cross reference ensuring individual has access to own ID
- We offer support to individuals who do not have a bank or NI Number
- Our branch locations now play the GLAA modern slavery video on loop within the waiting area
- CCTV has been installed both inside and outside the branch to support the GLAA investigations

Once we suspect a Modern Slavery case, we follow this process:-

- Modern Day Slavery Candidate Risk Assessment to be filled out by the Recruiter & Coordinator

- A welfare meeting is held with the worker discretely
- Full investigation carried out/observations/investigation
- Notify GLAA

Training

Last year, the company paid for external training from our partner Stronger Together. We had a range of various managers, from different site locations attend the course which took place across a day. The training covered all aspects of modern slavery, how to spot the signs and how action should be taken on a site and national level. Each new start of the company is also taken through training on exploitation and slavery, specifically on how to spot the signs and how to raise concerns within senior managers, including the complaints procedure and whistleblowing procedure.

The training conducted with all new starters, also includes a short video produced by the GLAA which shows real-life examples of exploitation, which really provides an understanding to our team how exploitation takes place, and how we can support the GLAA with enquiries.

We run an annual email campaign each year, promoting the use of our Modern Slavery toolkit, whereby we also re-share our policy and the GLAA video, to re-iterate the importance and awareness.

Our company directors are the main drivers of all our internal policies and are therefore integral in driving the Anti-Slavery and Human Trafficking policy. The directors ensure the training conducted by the HR and operational team is of excellent standard for our permanent and temporary employees.

The company have determined our temporary workforce are at the highest risk of modern slavery, in particular, our European temporary employees. Our largest sites with high European workforces' run a short induction presentation with all new starters during the interview and registration process. The induction covers all aspects of the role and our company policies and procedures, including Modern Slavery training and the GLAA video. Our employees are encouraged to report any signs of exploitation to their managers and are fully aware they have a central HR contact should they wish to raise concerns outside of the workplace. The training is provided to well over 2,000 new starters every year.