



## Modern slavery statement

### Organisation

This statement applies to Talent84 Ltd (referred to in this statement as 'the Organisation'). The information included in the statement refers to the financial year 2020.

### Organisational structure

Established in September 2020, the Organisation is one of the North East's leading temporary workforce providers. Working in partnership with a large number of clients and workers, specialising in high volume, flexible, temporary workforce recruitment and permanent recruitment across professional services. We support a range of sectors including food production, manufacturing, construction, driving and logistics, oil and gas, IT, office support, finance and engineering.

Head office is in Newcastle upon Tyne, with branches located in Middlesbrough, South Shields, Sunderland and Wakefield.

The organisation is controlled by an Operational Board made up of Lucille Lowe, Director and nine Operations Managers.

The main activity carried out by the Organisation is the supply of high volume, temporary workforce. Demand for high volume, temporary workforce is consistently high throughout the year and is therefore not seasonal.

### Definitions

The Organisation considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse or the threat of abuse
- being dehumanised, treated as a commodity or being bought or sold as property
- being physically constrained or to have restriction placed on freedom of movement.

### Commitment

The Organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Organisation does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom.



### **Potential exposure**

The Organisation considers its main exposure to the risk of slavery and human trafficking to exist in its temporary workforce.

In general, the Organisation considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

### **Impact of COVID-19**

During the reporting period covered by this statement, the COVID-19 pandemic had taken hold. For several months, the UK was placed into lockdown to stem the spread of COVID-19. This created several challenges for the Organisation, as it did for others across the nation.

The Organisation welcomes the UK Government's decision, as confirmed in April 2020, to allow for a delay of up to 6 months in the publication of modern slavery statements without the risk of facing penalty.

Despite the permitted, delay, the Organisation remains in a position to publish its statement for the financial year 2019/2020 in line with the original publishing requirements.

The Organisation concludes that the COVID-19 pandemic did adjust the risk of modern slavery to a level above that which existed before the pandemic, which is as set out under 'POTENTIAL EXPOSURE' above.

The risk of modern slavery increased because demand for our temporary labour services was significantly higher than normal in order for our clients to meet the need of its customers.

During the pandemic, the Organisation's employees still had access to the grievance procedure to raise any concerns that they may have had.

In line with emergency legislation passed by the Government, employees have been paid Statutory Sick Pay during periods of self-isolation where it has not been possible to agree a temporary period of homeworking.

The Organisation's modern slavery risks were subject to the same monitoring procedures during the pandemic as at all other times.

### **Steps**

The Organisation carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.



In accordance with section 54(4) of the Modern Slavery Act 2015, the Organisation has taken the following steps to ensure that modern slavery is not taking place:

#### Steps for candidates

As a supplier of high volume temporary labour, we ensure the following checks are carried out and issues arising are investigated fully.

Visual welfare checks, to ensure no visible signs of abuse, such as:

- Old very worn clothing which can indicate the individual is not responsible/has access to own earnings
- Timid or scared demeanour if accompanied by another person
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Key Data check which includes

- Bank account details – these must be in their own name and proof of relevant documentation taken
- Address – ensure the same address isn't registered for large numbers of other workers
- Contact information – workers must have their own mobile phone and email address
- Changes to information – these must be done in person at one of our locations

#### Supply chain

The Organisation observes strict due diligence checks within our supply chain network, to ensure all legislative obligations are complied with, ensuring the safety of the supplied temporary work force. Onsite meetings with their responsible person are carried out before the supply of any labour. Whilst in attendance their Modern Slavery statements are obtained and verified to ensure they meet our high standards. All relevant processes and policies are collated and forwarded to our HR department to ensure compatibility with our own. Any discrepancies are addressed before the supply commences.

Onsite audits are carried out at regular intervals to identify any potential risks which may result in more strict measures being applied to individual sites. Spot checks also carried out on a monthly basis by Consultant/Representative of the Organisation.

Guidance is regularly taken from GLAA, ALP and Stronger2gether to ensure most up to date legislation and measures are being upheld.

#### Key performance indicators

The Organisation has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in the Organisation or its supply chains.

- We assess and measure proactive cases identified across our business as we actively encourage and support our staff to speak up if they see any red flags
- Evaluate risk related activities including emerging risks relating to Covid-19
- Continuous improvement plans for staff training and development to increase knowledge and awareness to improve compliant, ethical practices
- Strengthen networks that support our ethos to eradicate Modern Slavery
- Review supply chain transparency and risk across the business and our clients



- Keep the subject alive by sharing headlines from cases in the UK, key learnings shared by the enforcement authorities
- Keeping our workers at the heart of everything we do
- All of our compliance team are on a continuous learning path keeping linked into the SMEs including the front line charities that help victims of trafficking picking up key information.

## Policies

Looking after our workers and their wellbeing is at the core of our business and reflected throughout our company values.

Each case gives us valuable learning and feedback from all of our partners organisations that we work with, to help improve our processes to strengthen them and create new checks as soon as we hear how the traffickers are evolving and learning new ways to infiltrate businesses like ours and those around us.

We continue to invest in our IT systems to help us run checks throughout our whole database, providing valuable information to the enforcement authorities when requested, for assistance with cases. New bespoke reports will be used, tweaked and changed to be fit for purpose to help us identify more potential victims of trafficking tracking throughout a worker's journey, to identify potential signs of Modern Slavery.

We check for any patterns with other workers details to look for signs of sharing, watch out for anomalies and trends along with and investigating any areas of concern, at our earliest opportunity.

We use a variety of communication methods to deliver Modern Slavery and worker welfare strategies and monitor data to improve our operations and worker experience. Our staff and our workers are integral to our strategy to identify Modern Slavery, exploitation, and worker welfare concerns.

Working better with the local councils, we do what we can to link up with them to investigate further any houses of multiple occupancy and any overcrowding issues that arise from these alerts, as we recognise that this is a common symptom of potential Modern Slavery.

Our internal audits ensure Modern Slavery information is displayed in all our offices and staff are familiar and complying with the Organisations policies and processes to protect worker welfare.

Material from the GLAA and Stronger Together in various languages delivers that clear strong message to encourage workers to report in any concerns.

We maintain a centralised repository of company policies, ensuring all of our staff have access and visibility of company policies. We regularly review and communicate via multiple digital methods policy updates and company principles.



Our internal reviews implement continuous improvement plans including updating our Modern Slavery Statement to comply with the UK Government statutory guidance to cover six key pillars and driving effective change to continue to tackle Modern Slavery across our business.


Our Compliance Manager reviews root cause and continuously implements improvement and training across our company, where appropriate we endeavour to remedy, support any individuals to seek justice and compensation.

**Slavery Compliance Officer**

The Organisation has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the Organisation's obligations.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Date of approval:

Signed:   
Print name: LUCILLE LOWE  
Job Title: DIRECTOR  
Date: 07/10/21

