Introduction

The Modern Slavery Act 2015 requires large employers to be clear about their efforts to remove Human Trafficking and Slavery within their supply chain.

As a labour provider we are on the front line in upholding the Act's intention to stop slavery and human trafficking in our business and wider supply chain. We recognise the important responsibility we have given the nature of our business, and we continue to strive to operate our business in an ethical manner, and we are committed to combatting trafficking and slavery at every opportunity.

In accordance with the Modern Slavery Act, this statement communicates the policies and practical outworking of how Thorn Baker attempt to recognise and prevent human trafficking and slavery in the supply chain.

Business Structure

Thorn Baker Limited is a labour provider, operating primarily in the Industrial, Construction and Facilities Management sector's. Typically we will supply around 1850 workers to over 390 clients each week in the UK.

We employ 85 staff across our local branch network, on site locations and Group Service support function.

Slavery & Human Trafficking in our Business and supply chain

In tackling human trafficking and slavery within our business we commit to the following steps;

- Identify any areas of risk within Thorn Baker and our wider supply chain
- Takes steps to mitigate any risks highlighted
- Regularly review the effectiveness of our risk prevention
- Protect and encourage whistle blowers

Policies

Thorn Baker has a Modern Slavery policy, and in addition have a number of other policies which give clear guidance to our employees. We pride ourselves in trading in an ethical manner;

- Corporate Social Responsibility policy
- Anti Corruption & Bribery Policy
- Equality, Diversity & Inclusion Policy
- Whistle Blowing Policy

Our Policies are established by the Senior Leadership Team and are reviewed on an annual basis by the Board of Directors. These policies are available upon request, please email matthew.dann@thornbaker.co.uk

Operational Procedures

As a provider of labour it is vital that we do all we can to protect workers from slavery and human trafficking. We have implemented a number of robust processes within our business and have the support of an internal Compliance Manager to oversee the effective out working of these processes. There is no single process that will entirely eradicate the risk of slavery and trafficking, the following are the key steps we take to detect and prevent modern slavery within our workforce.

Recruitment of temporary workers

- The majority of applicants are interviewed face to face in one of our branch or on site locations. If this isn't possible applicants are interviewed via Video
- All applicants complete their own registration documentation – and are all interviewed individually as part of the process
- Right to work documentation is reviewed for all applicants by our trained teams
- All operational staff are trained to look for any evidence of modern slavery, and how to provide a safe environment for workers to approach us with any concerns
- As part of our applicant registration process all applicants are provided with written information giving relevant contact details and resources about slavery and human trafficking
- All of our office locations have notices and posters displaying contact details and other resource information about slavery and human trafficking

Payment of temporary workers

- Payslips are made available to workers individually by either email or post.
- Workers are paid by BACS payment weekly, into their own bank account, the only exception to this would be for wages to be paid into their partners account

Due Diligence

- We have a dedicated Compliance Manager who conducts scheduled audits of our worker database, checking for any duplicated bank account details, email addresses, home addresses provided or duplicate contact numbers (mobile or landline)
- If any potential activity is highlighted, Senior Management team are notified and will investigate
- In the event any Gangmaster activity is identified we will work with the Gangmaster and Labour Abuse Authority (GLAA) to find a solution

Training

We believe that having well trained employees is a vital tool to combat modern slavery. As part of every new starter on boarding process we deliver specific training and resource to ensure our staff are aware of the risks of slavery and human trafficking, and so that they have the capability to recognise potential instances of slavery and human trafficking in their interactions with workers and within the wider supply chain.

On an annual basis we provide refresher training for all operational staff in modern slavery and worker exploitation.

We provide regular workshop classes for all Operational staff to communicate any legislative changes and/or best practice related to slavery and human trafficking.

Accreditations and memberships

- GangMaster Licence and Abuse Authority (GLAA)
- Recruitment & Employment Confederation
- Association of Labour Providers (ALP)
- Sedex

This statement is made in accordance with section 54 of the Modern Slavery Act 2015 and relates to the financial year May 1st 2023 to April 30th 2024. It was agreed and approved by the Board of Directors on 9th September 2024.



Matt Dann
Group Director