Venesky-Brown
WORKING PARTNERSHIPS

Modern Slavery Statement

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Contents

1. Introduction....2
2. Our Business....2
3. Our Policies....3
4. Our Processes for Managing Risk....3
5. Our Performance....3
6. Tackling Modern Slavery....4
7. Our Training....4

1. Introduction

This statement is made as part of Venesky-Brown Recruitment's commitment to eliminating the exploitation of people under the Modern Slavery Act 2015 (the Act). It summarises how Venesky-Brown Recruitment operates, the policies and processes in place to minimise the possibility of any problems, any risks we have identified and how we monitor them and how we train our staff.

This statement is published in accordance with section 54 of the Act, and relates to the financial year October 2022 to September 2023. It was approved by the board of directors in March 2024.

2. Our Business

Venesky-Brown Recruitment is a limited company operating in the recruitment sector. We are a leading provider of resourcing solutions, rapidly expanding our presence across the UK into sectors including Construction, Engineering, Corporate Services, Digital and IT.

We have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains. We appreciate that the construction sector is high risk when it comes to modern slavery and accounts for a significant portion of issues in the UK. We therefore continually renew and assess our processes and controls to ensure we have robust protection and protocols in place to eliminate any chances of modern slavery.

Who We Work With

All of the hirers that we work with, and all of the work-seekers we provide, are known to and identified by our staff. All of the temporary workers we supply are identified by our staff. Some of these work-seekers operate through their own limited companies.

Other Relationships

As part of our business, we also work with the following organisations:

- The Recruitment and Employment Confederation (https://www.rec.uk.com/)
- The Scottish Building Federation (https://www.scottish-building.co.uk/)

3. Our Policies

Venesky-Brown Recruitment has the following policies which incorporate ethical standards for our staff and our suppliers

- Equality, Diversity & Inclusion Policy
- Anti-Bribery Policy
- Fatigue Management Policy
- Modern Slavery Policy
- Health and Wellbeing Policy
- Whistleblowing Policy

Venesky-Brown's policies are established by our directors and our senior leadership team, based on advice from HR professionals, industry best practice and legal advice. We review our policies annually or as needed to adapt to changes.

4. Our Processes for Managing Risk within our supply chain

In order to assess the risk of modern slavery, we use the following processes with our suppliers:

- When engaging with suppliers, we ask for evidence of their processes and policies, including commitments around modern slavery, human trafficking, forced labour, human rights, and whistle-blowing.
- We review the potential for risk at regular intervals, including the possibility of auditing a supplier or conducting spot checks.

Additionally, we have taken the following steps to minimise the possibility of any problems:

- We reserve the right to conduct spot-checks of the businesses who supply us, in order to investigate any complaints
- We require the businesses we work with to address modern slavery concerns in their policies.
- Only senior members of staff who have undergone appropriate training for assessing modern slavery risks in the supply chain are authorised to sign contracts and establish commercial relationships in any area where we have identified the potential for risk.
- We collaborate with our suppliers in order to improve standards and transparency across our supply chain.
- We ensure that all of our suppliers are members of appropriate industry bodies and working groups.
- We provide feedback on business incentives that can be given to suppliers and other business partners and contractors to implement anti-slavery policies
- We provide guidance on what steps a Company should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the Company's supply chains

Our staff are encouraged to bring any concerns they have to the attention of management.

5. Our Performance

As part of monitoring the performance of Venesky-Brown Recruitment, we track the following general key performance indicators:

- Training: Modern Slavery training as part of the on-boarding to ensure Modern Slavery awareness throughout the business.
- Recruitment: Where possible individuals are met face to face as part of their on-boarding and continuous communication throughout their placement. Where restrictions or distance make a face to face meeting impossible we have video calls with potential candidates.

- Right to Work: Stringent verification processes to ensure the right to work in the UK. These processes are in line with government guidelines in this area.
- Audits: We carry out internal audits on high risk groups
- Dealing with Complaints: We aim to deal with all complaints received in line with our Complaints Policy

6. Tackling Modern Slavery

Venesky-Brown have implemented the following:

- Signatory to GLAA Construction Protocol
- Partner of the Supply Chain Sustainability School
- Recurring annual Modern Slavery training for staff on how to spot the signs and reporting
- Right to work checks in line with government guidance
- Whistleblowing online reporting tool
- Meet all workers face to face prior to start date
- Complete candidate care calls on a regular basis

2024 Plans

- Conduct toolbox talks on a regular basis specifically referencing current Modern Slavery issues & concerns
- Provide Modern Slavery updates via newsletters, social media posts, website news articles etc.
- Attend Modern Slavery workshops with the Supply Chain Sustainability School and GLAA
- Continually review and improve progress against the Supply Chain Sustainability School People Matter Charter to become experts
- Increase quality and quantity of modern slavery training
- Maintain our Investors in diversity accreditation

7. Our Training

Our zero-tolerance approach to modern slavery is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter. Training on the risk our business faces from modern slavery in its supply chains, forms part of our induction process for all individuals who work for us, and regular training will be provided as necessary. In particular:

- Our leadership team receive detailed training in identifying and resolving concerns around modern slavery and human trafficking.
- Our Operations and HR Team undertake training courses that include guidance around modern slavery and human trafficking, as well as other wider human rights issues.
- All of our staff receive 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.

As part of this, our staff are encouraged to discuss any concerns that they have with Management.

The statement will be reviewed annually to ensure that it remains relevant and up to date.