

Modern Slavery Statement 2023-2024

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1. Introduction

Modern slavery is a criminal offence and has various guises such as slavery, servitude, forced labour and human trafficking. This violation of human rights is abhorrent and Brightwork has a zero-tolerance approach to modern slavery, exploitation, and human trafficking.

It is our responsibility to support our workers in their journey to enjoy safe and secure work environments. We believe working to prevent Modern Slavery is one of our highest priorities and we work alongside other businesses, charities and organisations that take this matter as seriously as we do. We are committed to preventing modern slavery in all our recruitment activities and our supply chain.

Brightwork has published an annual modern slavery statement for many years, identifying the aims, objectives, and preventative measures we undertake to try to stop modern slavery and human trafficking throughout our business. A review of the Ethical Trade Initiative base code guidance has been completed in preparing this year's statement. We have undertaken an assessment of risk and have implemented plans and actions to mitigate those risks. We are, however, aware this is an ever-evolving crime, and its nature is complex and ever changing, we are committed to continuing to evolve with the support of our stakeholders and will continue to work proactively to identify and address these risks and ensure that all our recruitment activities are conducted ethically and in compliance with all relevant laws and regulations.

The impact of the Covid-19 pandemic is still being felt alongside the conflicts and crises in other parts of the world; we all acknowledge the humanitarian and economic impacts these issues have had and are still having today. It is unfortunate that these scenarios create opportunities for exploitation and modern slavery, where people are vulnerable and desperate to provide for themselves and their families and it is devastating to know that criminals see this as an opportunity to make financial gain. They do this in various means such as promising guaranteed work, housing, and transport to name a few. It is key we work together to support those in need and prevent exploitation of anyone, especially those who are more vulnerable, and we believe Brightwork has a wealth of opportunities for people to succeed in a safe, secure environment.

Our experience grows year after year, working closely with the Gangmasters Labour Abuse Authority (the 'GLAA'), the Home Office, the police forces across the country, and collaborating and sharing insights with anti-slavery networks in all regions of the UK. Brightwork supports working together and actively contributing to the established networks to eradicate this criminal activity.

2. About Us

Established in 2006, Brightwork is Scotland's largest recruiter and workforce provider, delivering recruitment and workforce solutions to leading brands. We work together with our clients as an integrated business partner, operating at over 150 delivery sites across Scotland.

Brightwork focuses on helping business to find the right people for their organisation, while also helping candidates to find the right job opportunities. We have a team of experienced recruiters who are knowledgeable about various industries and can provide expert advice and support throughout the recruitment process.

As a trusted and reliable recruitment agency, Brightwork provides customised recruitment solutions to meet the unique needs of each client, which are underpinned with our compliance and ethical standards throughout the recruitment journey and worker experience. Our focus is to help businesses to find the right people for their organisation, while also helping candidates to find the right job opportunities. We have a team of experienced recruiters who are knowledgeable about various industries and can provide expert advice and support throughout the recruitment process.

Our services are supported with innovate technologies which include Brightwork's bespoke candidate/worker management tool 'Universe', our industry-leading customer experience management programme and survey tool 'Have your Say', and more recently we have introduced 'Connie' – an integrated AI chat bot which supports with providing support and responses to inbound queries so that our candidates/workers are directed to the right place, first time.



3. Brightwork Organisational Structure & Supply Chain

Brightwork is a Scotland-based recruitment agency that specialises in providing recruitment and workforce management solutions to businesses in various industries. With branches located in Glasgow and Elgin, we support our clients from the Borders up to the Central Belt, spanning across to the Western Isles and extending to the most northerly points of Scotland. Providing on-site solutions services to 20+ locations across the Central Belt, we have a permanent presence within our clients’ sites, providing a dynamic and flexible resourcing service, on location, right at the heart of their businesses.

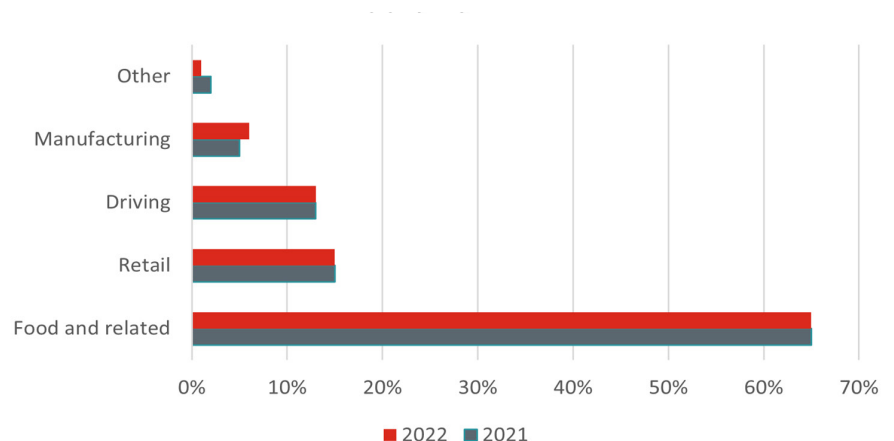
Brightwork is a subsidiary of Staffline Recruitment GB; one of four divisions along with Datum RPO, PeoplePlus and Staffline Recruitment Ireland, which form Staffline Group Plc.

For more information on the structure of Staffline Group Plc, [click here](#).

We have 75 recruitment suppliers; the majority of which are registered in the UK. Those that are not based in the UK are EU based and hold a UK Gangmaster Licencing Abuse Authority (GLAA) licence to operate in the UK. All suppliers are audited at the point of our initial engagement and then on an annual basis thereafter, or more frequently if Brightwork considers that this is appropriate. A review of the audit processes and our approach is a primary objective for 2023-2024, alongside the risk rating of our suppliers.

Supply by sector in 2021 & 2022

Sector	2021	2022
Food & Related	65%	65%
Retail	15%	15%
Driving	13%	13%
Manufacturing	5%	6%
Other	2%	1%



Our Focus

Brightwork is committed to delivering a range of private and public services to find and support people into employment and develop skills. We do this through fair and clear terms, development opportunities, an equal opportunities policy for all, and safe, respectful, clean, and healthy work environments.

Our Values



Brightwork's goal is to support people into good work to enable our workforce and our clients to fulfil their goals and aspirations. We achieve this through our company values and our human-centric approach, and this is embedded in our daily behaviours and our work with stakeholders.

At the heart of our business are the individuals we support into work; for example, by implementing AI technology 'Flin' we have improved our job search facilities to support the individual to 'Find Me Work', and we will continue to innovate. These dynamic solutions allow us to focus on an individual's journey, identify any concerns, and to provide support along the way.

We have a forward-thinking and market-leading People team who work hard to help embed the culture of Brightwork, promoting important topics such as Women in Leadership, Pride Month, Mental Health Awareness, Neurodiversity Celebration Week, and Anti-Slavery campaigns.

Our Aim

For 2023, a primary aim is to continue building on our relationships and working partnerships with charities across the country to support our workforce and local communities. Staffline's reach enables us to provide opportunities to support survivors into good work in safe and secure environments.

We are proud to have supported over 43 survivors into work placements and supported many more with job opportunities. Collaborating with various stakeholders and using our innovative IT platforms, Brightwork is able to support survivors onsite and remotely, enabling us to work cohesively with the supporting charity during those initial first weeks back to work.

Brightwork values charities and authorities joining us on our investigations to ensure all individuals identified have the most appropriate support networks available.

4. Policy Statement

Brightwork has a zero-tolerance approach to modern slavery and human trafficking in all our operations and supply chains. We acknowledge that slavery and human trafficking are serious human rights abuses that have no place in modern society.

We will conduct our business with integrity and will not knowingly support or deal with any business involved in slavery or human trafficking. We expect our suppliers, contractors and other business partners to share our commitment to preventing slavery and human trafficking.

To fulfil our commitment, we will:

- Conduct due diligence checks to identify and assess potential modern slavery risks in our operations and supply chains;
- Take appropriate action to address any identified risks and work with our suppliers and partners to improve their practices;
- Provide training to our employees and suppliers to increase awareness of modern slavery and how to identify and report any potential cases;
- Support our clients and suppliers by sharing our experiences to help with their employee awareness and policy/processes development;
- Encourage and support the reporting of any suspected cases of modern slavery and human trafficking;
- Regularly review and monitor our policies and practices to ensure that they remain effective in preventing modern slavery and human trafficking;
- Protect our employees; against any human rights violations, their freedom of movement and association, against unfair recruitment practices and ensure they have access to internal and external grievance mechanisms.

We are committed to continuously improving our efforts to prevent modern slavery and human trafficking and to comply with all relevant laws and regulations. Our company policies are hosted on a live environment for all employees to access at any time and are supported with the additional awareness-checking learning materials on our Learning Experience Platform (the 'LXP'). Our policies support our commitment to protect human rights and eradicate modern slavery and unethical practice.

5. Due Diligence

We conduct due diligence checks on all our labour suppliers of temporary and permanent workers to ensure that they comply with our ethical standards and values. Brightwork will take appropriate action if any non-compliance is identified.

We are undertaking reviews on suppliers to Brightwork to ensure they share the same aims and standards that we hold in such high regard. We actively support these organisations in every way we can, and our reviews include an assessment based on risk. This approach stems from the Government's Modern Slavery Assessment Tool ('MSAT'), which enables us to identify and implement applicable scoring and assessment criteria. Where appropriate, a development plan will be implemented with suppliers, with supporting implementation plans and review schedules.

Brightwork is currently working towards ISO9001 certification to ensure our policy management is consistent and comprehensive. We have a suite of policies relating to human rights, modern slavery, human trafficking, including recruitment practices.

In Brightwork, throughout a worker's journey, we conduct checks to identify potential signs of modern slavery. Any indication is followed up by our dedicated Compliance Investigations team to ensure we complete a thorough and independent review, which will include supporting with all follow-up activities including liaison with external third parties as and where appropriate.



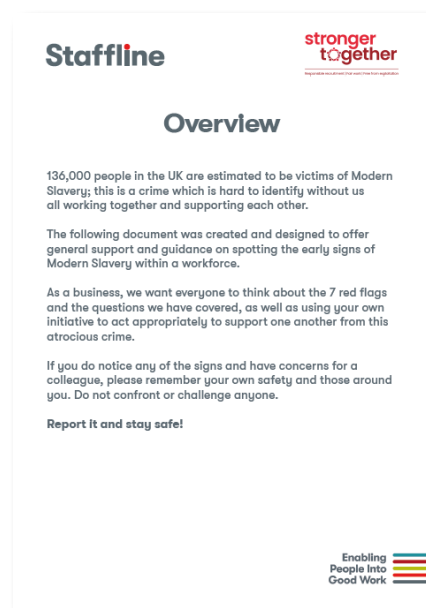
6. Training & Awareness

Our Worker Handbook is an important communications tool and contains lots of key information for our workers, including how to get help if they need it. Our Worker Handbook is produced in nine languages so that we can be sure that our worker demographic is suitably represented through this publication.

Brightwork provides training to all our employees on modern slavery and human trafficking indicators and risks. We also raise awareness of how to 'spot the signs' through our 'red flags' approach which has been developed over the years based on our direct experience, through our communications channels including our website, social media, and other associated marketing materials. This includes how to identify and report any suspected cases, and the reporting processes are underpinned with an open culture of reporting any potential issues or concerns, even if this is based on a best judgement with little or no evidence.

All suspected cases are reported into our Compliance team; an experienced team of people with Police and GLAA backgrounds. They support the business in attending operational sites, delivering training, and conducting worker welfare checks. Alongside this the team conducts detailed and impartial investigations following any intelligence leads or complaints received to ensure that the welfare of workers remains central to our thinking and helps Brightwork to remain compliant.

Brightwork does not require any employee or worker to pay for employment through any means, we do not retain nor withhold any personal identity documents, and we do not support forced or bonded labour. Any allegation of such actions will be investigated fully by our independent Compliance Investigations team.

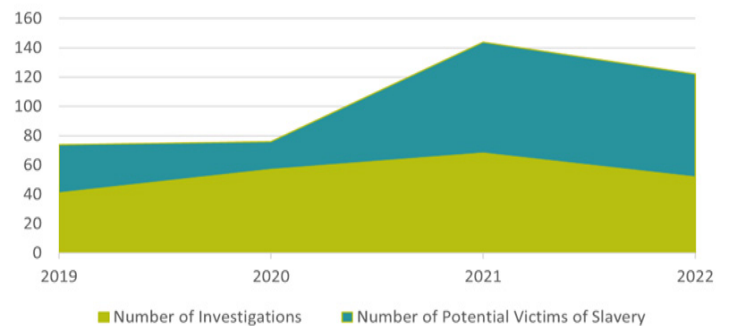


7. Key Performance Indicators (KPIs) & Risk Assessments

Brightwork monitors and reports on our performance in preventing modern slavery and human trafficking in our recruitment activities. We regularly review our policies and procedures to ensure that they are effective in addressing these risks. We have undertaken an internal risk assessment which is regularly reviewed and an external risk assessment through partnership with the ‘Stronger Together’ initiative.

One key indicator of success for us is the number of investigations and potential victims of modern slavery we identify within our business. The scale and scope of Brightwork creates some certainty that we will be a target for criminals to infiltrate and abuse our business. We believe that the number of cases reviewed in each year as shown below demonstrates that we are delivering appropriate training to ensure this awful crime is identified, reported, and prevented from continuing.

Year	Number of Investigations	Number of Potential Victims of Modern Slavery
2019	41	33
2020	57	19
2021	68	76
2022	52	70



All investigations are logged centrally and reviews on reporting mechanisms are undertaken to identify routes and strategies to increase awareness or accessibility. These include reviewing grievance mechanisms and whistleblowing reports as well as noting reports from stakeholders to monitor collaboration.

Additional performance indicators are the delivery of modern slavery training to all staff through our improved IT systems in a timely and fair approach; ensuring this target remains over 95% throughout the year is supported by our IT systems.

Brightwork reviews multiple modern slavery indicator reports to identify any areas of concern; for 2023 we are tracking the time taken to review and either resolve or escalate an issue so we can identify improvement opportunities to ensure we respond in an effective and reasonable time.

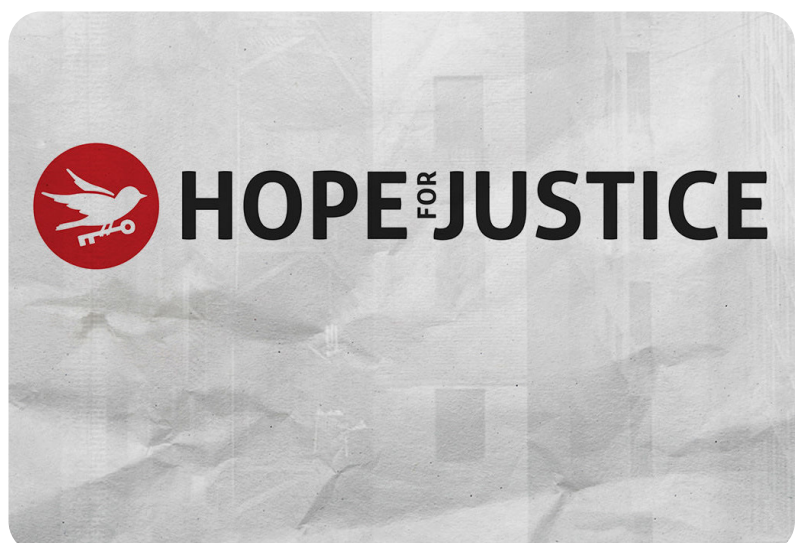
8. Collaboration & Communication

We communicate regularly with our suppliers, customers, and stakeholders to ensure that they are aware of our commitment to preventing modern slavery and human trafficking in our recruitment activities. We work collaboratively with them to identify and address any risks and to share best practices, and our experienced team often spends time with HR and management teams outside of Brightwork to help with wider awareness and application of effective processes and support arrangements.

We work in collaboration with the Gangmaster and Labour Abuse Authority and report all cases or suspicions of modern slavery. This has resulted in Brightwork being acknowledged in several cases for the intelligence and support we provide to the authorities and the individuals involved.

We work continuously to prevent unlicensed gangmasters from infiltrating our business and exploiting our workers and regularly engage with authorities and charities to tackle Modern Slavery, including; [Migrant Help](#), [Hope for Justice](#), [Spring Housing](#), [The Jericho Foundation](#), [The Sophie Hayes Foundation](#), [City Hearts](#), and the Police force. In addition, we collaborate with the [Stronger Together initiative](#), using the Responsible Recruitment Toolkit to keep Modern Slavery high on ethical agendas.

We connect with other enforcement authorities and charities to help the victims identified and help the police find the perpetrators. Brightwork is leading the way by working collaboratively with charities to ensure the potential victim is appropriately supported and providing a victim centric approach. The impact of having several supporting charities working alongside Brightwork has been invaluable in achieving great results; since 2020 we have supported 17 survivors of modern slavery find employment opportunities.



8. Collaboration & Communication (cont.)

Furthermore, Brightwork has been instrumental in organising case reviews from the Police and GLAA with attendance from other labour suppliers and clients to collectively continue to develop our learning opportunities. One such case reported by our Operations team led to our Compliance team initiating a joint exercise with our client and the GLAA to conduct worker welfare interviews and simultaneously supporting training of new GLAA officers. The GLAA acknowledged the value of this collaborative work and the intelligence gathered supported their enquiries further. Such work is integral to disrupting modern slavery and human trafficking and joint operations are fundamental to stopping such an abhorrent crime.

Our compliance reports provide insights that we actively use to report to local authorities. These are insights into illegal houses of multiple occupancy or overcrowding, shared bank account details, and telephone numbers. All these are issues which can be common indicators of potential modern slavery or exploitation and have resulted in Brightwork being instrumental in cases to prevent worker welfare issues and leading to arrests of abusers.

We are business partners with the Stronger Together initiative and support their work in helping businesses understand modern slavery and their practical guidance on implementing the relevant checks throughout an organisation. Most of the Compliance Investigations team members and our Governance Director have completed the Stronger Together Advanced Tackling Modern Slavery in UK Businesses course and completed the Labour Provider/ Recruitment Business Good Practice Implementation Checklist, whilst also accessing and promoting the wealth of Stronger Together training and tools available.

Additionally, we work with several anti-slavery partnerships across the country. This provides direct access to first responders, authorities, intelligence, and support. We play an active role in these meetings as Brightwork is such a large recruitment company we have invaluable intelligence and supportive opportunities that are a significant benefit to all.

9. Governance & Oversight

We have established governance and oversight mechanisms to ensure that our policies and procedures are effectively implemented, and to monitor our performance in preventing modern slavery and human trafficking. Brightwork's Governance Director is responsible for ensuring compliance with our modern slavery statement and to oversee the implementation of our policies and procedures.

All our policies reflect the principles of protecting the welfare of our workers. Looking after their wellbeing is at the core of our business and reflected within all processes and management arrangements. We constantly improve our processes to strengthen them and implement new checks as soon as we hear new learnings of how 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 across our database and supporting platforms, which helps us provide valuable information to enforcement authorities, as and when they get in touch to ask for our assistance with cases. Further, the application of structured data within our reporting tools is allowing for greater levels of automation and is helping Brightwork create 'insight dashboards' using innovative management information software packages. The outputs of this work will mean that our internal teams are able to focus more of their time and energy on investigations and follow-up activities, and thus our impact of this data will strengthen over time.

Our internal audits ensure modern slavery information is displayed in all our offices and staff are familiar and comply with Brightwork policies and processes to protect worker welfare.

We maintain a centralised repository of company policies, ensuring all our staff have access to 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 internal Compliance Investigations team review root cause and continuously implement improvement and training across our company, where appropriate we endeavour to remedy and support any individuals to seek justice and compensation.

10. Spotlight on Best Practice



Brightwork is a subsidiary of Staffline Recruitment GB, one of 4 divisions within Staffline Group Plc. Through significant investment into our Scottish operations, Brightwork has grown to become Scotland's largest recruitment agency, providing up to 5,000 workers each week across a huge range of industries.

The three largest drinks producers in Scotland use Brightwork as a sole supplier of their temporary industrial labour. We support food production and logistics customers across Scotland, enabling us to mobilise the largest temporary workforce in the country.

The Scotland Against Modern Slavery ('SAMS') movement was founded by Brightwork in 2017 with the focus being to raise awareness of modern slavery in the Scottish business community. Today the movement partners with the Scottish Government, Police Scotland, the Gangmasters Labour and Abuse Authority, Migrant Help, and several other NGOs, charities, as well as 56 Corporate Partners across Scotland.

The Scottish Government's Human Trafficking and Exploitation Act 2015 provides further legislative grounding in Scotland and, through SAMS, Brightwork collaborates with the Scottish Government's Human Trafficking Team to ensure that the Scottish business community is aware of this.

Working closely with Migrant Help, Refugee Survival Trust, and Survivors of Human Trafficking in Scotland ('SOHTIS') Brightwork has committed to help find work for rescued victims through our client and community relationships. Brightwork Director, Shan Saba, is also a Trustee for the Refugee Survival Trust charity which provides refugees and people seeking asylum with practical support when it's most needed, building connections and campaigning for change.

Many of the Trust's service users remain ineligible for work in the UK whilst they navigate the Home Office asylum process. Often their workplace skills have been eroded, they are destitute and highly vulnerable to exploitation. On behalf of the Trust, SAMS runs educational workshops to prepare these people to become 'work-ready', helping them to recognise exploitation and identify what 'good work' is, and what good employers looks like.

10. Spotlight on Best Practice (cont.)

In 2023, the SAMS movement enters into its seventh year with all 56 Corporate Partners committed to playing their part in eradicating human trafficking and modern slavery by sharing good practice and intelligence across the corporate sector, assisting victims in Scotland by finding them sustainable work and helping them to thrive as they settle into new lives.

Each organisation within the Corporate Partner group has an appointed ambassador whose remit is to take a lead role within their respective organisations, delivering the Scottish Government's Human Trafficking and Exploitation Team strategy, ensuring they exemplify best practice and generating awareness of modern slavery to their stakeholders and other businesses across Scotland.

SAMS organises and hosts monthly roundtables, boosted by regular, topical podcasts broadcast via Brightwork, assisted by guests and speakers ranging from the former Independent Anti-Slavery Commissioner, the First Minister for Scotland, and a former UK Prime Minister. The roundtable events are open to all Corporate Partners and invited guests and the aim of these, along with the supporting podcasts, is to continue to shine the light on emerging trends of perpetrators, live examples of new cases arising, government and public organisation activities, potential supply chain considerations and of course sharing best practices and business strategies.

During spring 2022, the Home Office worked closely with SAMS, delivering compliance workshops to the SAMS network of Corporate Partners. The Scottish Government's Trafficking and Exploitation Strategy Annual Progress Report highlights Brightwork's contribution via our work in developing SAMS, helping to inform and share best practice about human trafficking and exploitation throughout the business community in Scotland, acknowledging SAMS' success in raising awareness and supporting victims has been integral to the government's future strategy.

For further information on SAMS, [click here](#).



11. Future Plans

We are committed to continuously improving our approach to preventing modern slavery and human trafficking in our recruitment activities. We regularly review our policies and procedures and take appropriate action to address any identified risks or areas for improvement.

In 2019, we launched our campaign to encourage workers to know their rights and understand what to expect from working in the UK. We continue with this aim in mind to increase awareness across our workers, with a hope that they will be more confident to report in any exploitative practices either they experience themselves or on behalf of others being subjected to these.

At Brightwork, we place great importance on the role we play in helping to support local communities and the environment surrounding us, and our overarching strategy is articulated within our ESG report which is published annually.

We believe that ESG should not be a standalone compliance exercise. We recognise the importance of ensuring our ESG objectives are aligned to our corporate and governance strategies, which includes our commitment to tackling modern slavery and hidden labour exploitation within our own business, and with those with whom we work.

Our ESG Committee representatives have extensive knowledge of the Staffline Group Plc and each of the businesses within it to ensure our ESG strategy is linked to our wider business strategy and remains industry relevant. Our ESG report can be [found here](#).



12. Summary

Modern Slavery and Trafficking is a multifaceted global problem and, with the links to many criminal organisations, it remains a high risk to any supply chain or business. Brightwork will continue its investment in the identification and prevention of modern slavery; it remains a high priority for the business and that of our valued customers.



Julie Burnside

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