

# Modern Slavery Statement



The UK Modern Slavery Act of 2015 requires certain businesses to provide disclosure concerning their efforts to address the issues of slavery and human trafficking internally as well as within their supply chains. The disclosures are intended to provide Clients the ability to make better informed decisions about the services they buy and companies they support.

Be Personnel Limited recognises that slavery and human trafficking can occur in many forms. Therefore, throughout this disclosure we use the terms "slavery and human trafficking" to encompass various forms of coerced labour.

## Overview of Business

Be Personnel Limited supplies temporary and permanent recruitment services into the food and drinks processing, industrial, commercial and driving sectors throughout Scotland.

As a GLAA licenced labour provider, we recognise that we may be at risk of human trafficking and modern slavery. Be Personnel Limited is committed to maintaining and improving systems and processes to avoid complicity in human rights violations related to our own operations and that of our supply chain.

## Our Relationships

- Hirers
- Candidates
- 2nd Tier Suppliers

## Risk Management

Our Modern Slavery and Human Trafficking Policy as well as this Statement reflects our commitment to act ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls as set out below to ensure slavery and human trafficking is not taking place.

We undertake all reasonable and practical steps to ensure that our standards are being implemented throughout the business as well as those of our suppliers and that relevant legislation and regulations are complied with. We will only trade with those who fully comply with this policy.

## Training

- All Be Personnel employees are provided with Stronger Together training whether this be online or workshop based, along with regular updates and training from the Operations Director and/or their appropriate Line Manager.
- Consultants sign the Stronger Together Recruiter Compliance Principles ahead of interviewing any applicants and this document is held within their personnel file.
- Our Workers receive information to raise their awareness of hidden labour exploitation as part of their induction. This is by means of showing the Stronger Together Identifying Labour Exploitation Animation video as well as the Daniel & Weronika video. The Stronger Together Worker leaflets are provided, with opportunity for discussion and confirmation as to where any concerns should be reported to.

## Recruitment & Selection

- From inception of the interview process, Consultants and Resourcers check for signs of forced labour and hidden labour exploitation both visually as well as through effective use of questioning.
- Right to work checks are carried out in line with Home Office guidance incorporating both in person checks and also a UK government approved digital ID provider to ensure compliance. Any original documents are copied and handed straight back to Candidates.
- Interview questions are structured to gather information and identify red flags in Candidate welfare.
- A Stronger Together worker questionnaire is completed with all new starters to gather information on how they came to hear about Be Personnel and the vacancy, check that no recruitment fees have been paid and that their accommodation is not provided by a staff member.
- All Workers are paid directly in to their own bank account.
- A multilingual recruitment team is in place in order to effectively communicate with Candidates.

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## 2<sup>nd</sup> Tier Supplier Selection & Management

- Due diligence is taken when considering any 2<sup>nd</sup> Tier Supplier with a full audit conducting in order to identify potential risk to supply chain
- Where appropriate, an action plan is put in place with Partnership only commencing upon completion of all actions
- Be Personnel maintains specific control points to audit on-going compliance with regular reviews of process in place

## Auditing & Performance Monitoring

- Be Personnel's Business Support team conduct secondary reviews of new starter documentation upon upload to our internal CRM in order to spot any signs of concern including but not limited to, bank account details, duplicate telephone numbers addresses and next of kin
- Audits of data are conducted on a monthly basis which include duplicate bank accounts, next of kin and addresses

This policy statement relates to the financial year 2026 to 2027 and is authorised by the Board of Directors of Be Personnel Limited. Responsibility for the execution of detailed policies and procedures, in line with this policy statement, rests with the management of Be Personnel Limited.