

Modern Slavery Statement

This statement is made as part of Morgan Jones Limited's commitment to eliminating the exploitation of people under the Modern Slavery Act 2015 (the Act). It summarises how Morgan Jones Limited 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, despite us not meeting the threshold of necessity, and relates to the financial year Apr 2023 to March 2024.

It was approved by all four directors on 01/07/2024.

Definition of Modern Slavery

The definitions contained in the Modern Slavery Act 2015 consist of the following;

Slavery, servitude and forced or compulsory labour

1. A person commits an offence if—
 - a. the person holds another person in slavery or servitude and the circumstances are such that the person knows or ought to know that the other person is held in slavery or servitude, or
 - b. the person requires another person to perform forced or compulsory labour and the circumstances are such that the person knows or ought to know that the other person is being required to perform forced or compulsory labour.
2. In subsection 1 the references to holding a person in slavery or servitude or requiring a person to perform forced or compulsory labour are to be construed in accordance with Article 4 of the Human Rights Convention.
3. In determining whether a person is being held in slavery or servitude or required to perform forced or compulsory labour, regard may be had to all the circumstances.
4. For example, regard may be had—
 - a. to any of the person's personal circumstances (such as the person being a child, the person's family relationships, and any mental or physical illness) which may make the person more vulnerable than other persons;
 - b. to any work or services provided by the person, including work or services provided in circumstances which constitute exploitation within section 3 to 6.
5. The consent of a person (whether an adult or a child) to any of the acts alleged to constitute holding the person in slavery or servitude, or requiring the person to perform forced or compulsory labour, does not preclude a determination that the person is being held in slavery or servitude, or required to perform forced or compulsory labour.

Human trafficking

1. A person commits an offence if the person arranges or facilitates the travel of another person (“V”) with a view to V being exploited.
2. It is irrelevant whether V consents to the travel (whether V is an adult or a child).
3. A person may in particular arrange or facilitate V’s travel by recruiting V, transporting or transferring V, harbouring or receiving V, or transferring or exchanging control over V.
4. A person arranges or facilitates V’s travel with a view to V being exploited only if—
 - a. the person intends to exploit V (in any part of the world) during or after the travel, or
 - b. the person knows or ought to know that another person is likely to exploit V (in any part of the world) during or after the travel.
5. “Travel” means—
 - a. arriving in, or entering, any country,
 - b. departing from any country,
 - c. travelling within any country.
6. A person who is a UK national commits an offence under this section regardless of—
 - a. where the arranging or facilitating takes place, or
 - b. where the travel takes place.
7. A person who is not a UK national commits an offence under this section if—
 - a. any part of the arranging or facilitating takes place in the United Kingdom, or
 - b. the travel consists of arrival in or entry into, departure from, or travel within, the United Kingdom.

Meaning of Exploitation

1. For the purposes of section 2 a person is exploited only if one or more of the following subsections apply in relation to the person.

Slavery, servitude and forced or compulsory labour

2. The person is the victim of behaviour—
 - a. which involves the commission of an offence under section 1, or
 - b. which would involve the commission of an offence under that section if it took place in England and Wales.

Sexual exploitation

3. Something is done to or in respect of the person—
 - a. which involves the commission of an offence under—
 - i. section 1(a) of the Protection of Children Act 1978 (indecent photographs of children), or
 - ii. Part 1 of the Sexual Offences Act 2003 (sexual offences), as it has effect in England and Wales, or
 - b. which would involve the commission of such an offence if it were done in England and Wales.

Removal of organs etc

4. The person is encouraged, required or expected to do anything—
 - a. which involves the commission, by him or her or another person, of an offence under section 32 or 33 of the Human Tissue Act 2004 (prohibition of commercial dealings in organs and restrictions on use of live donors) as it has effect in England and Wales, or
 - b. which would involve the commission of such an offence, by him or her or another person, if it were done in England and Wales.

Securing services etc by force, threats or deception

5. The person is subjected to force, threats or deception designed to induce him or her—
 - a. to provide services of any kind,
 - b. to provide another person with benefits of any kind, or
 - c. to enable another person to acquire benefits of any kind.

Securing services etc from children and vulnerable persons

6. Another person uses or attempts to use the person for a purpose within paragraph (a), (b) or (c) of subsection 5, having chosen him or her for that purpose on the grounds that—
 - a. he or she is a child, is mentally or physically ill or disabled, or has a family relationship with a particular person, and
 - b. an adult, or a person without the illness, disability, or family relationship, would be likely to refuse to be used for that purpose.

Organisational Structure

The organisational structure of the business is a private limited company that consists of 4 company directors and provides Recruitment and Employment services to customers throughout the UK.

On an ongoing basis, we form part of a supply chain to deliver recruitment services to large corporate organisations and therefore form part of the supply process.

As part of the company's due diligence processes into slavery and human trafficking, we will annually review our processes and checks.

The inclusion of personnel sourced outside of the UK and EU is potentially more at risk for slavery/human trafficking issues. The level of management control required for these sources will be continually monitored.

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. We do not supply work-seekers to hiring companies through any intermediaries.

The companies that we work with are located nationwide. As are the work-seekers and workers we supply.

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

- Gangmasters and Labour Abuse Authority
- the Recruitment and Employment Confederation (www.rec.uk.com)
- Crown Commercial Service
- Investors in People

A full copy of this statement will be kept in the internal database system and available to all employees, as well as publicly on our website. The company will not support or deal with any business knowingly involved in slavery or human trafficking.

The Company Directors and Senior Management Team shall take responsibility for implementing this policy statement and its objectives and shall provide adequate resources/training and investment to ensure that slavery and human trafficking are not taking place within the organisation and its supply chains.

Supply Chain

Our supply chain is not very complex however we work with a range of suppliers that provide services across a number of varied categories.

These range from cyber security, IT, telecoms, technology sales, data analytics, and other services which can be seen on our company website.

We keep respectable relationships with our suppliers providing a good understanding and visibility of our supply chain.

Due to the relationships we have with our suppliers we consider the risk of exploitation, human trafficking and breach of human rights very low.

Nonetheless we are committed to ensuring such occurrences do not take place within our business or supply chain due to our procedures and due diligence.

Contracts

Our contracts include a provision for all suppliers to warrant that it has not and will not engage in any activity, practice or conduct which would constitute an offence under the Modern Slavery Act 2015.

Certification

Morgan Jones requires that every supplier reads and certifies compliance with our code of conduct in line with Modern Slavery Act 2015.

Policies

All Morgan Jones employees have access to channels in which they can communicate concerns, via internal whistleblowing procedures, which encourage all staff to report any wrong behaviour or breaches of our policies.

We hold a zero-tolerance policy on Modern Slavery and are committed to the highest level of ethical standards.

All employees are under duty to comply and understand this policy.

The prevention, detection and reporting of modern slavery and human trafficking within businesses or any supply chains is the responsibility of all those working for Morgan Jones. Morgan Jones Limited has a modern slavery policy available on our website and freely accessible in our central database.

In addition, Morgan Jones Limited has the following policies which incorporate ethical standards for our staff and our suppliers.

- Modern Slavery Policy Statement
- Equality Diversity and Inclusion Policy
- Disciplinary, Dismissal and Grievance Procedures
- Consultant Performance Standards Policy
- REC Code of Ethics & Professional Practice
- Anti-Bribery and Corruption Policy

Policy development and review

Morgan Jones Limited's policies are established by our directors, based on advice from the REC, GLAA, HR professionals, industry best practice and legal advice, and in consultation with the senior management team. We review our policies annually at a minimum, or as needed to adapt to changes.

Audits

At the time of writing Morgan Jones Limited does not fall under the scope of Section 54 of the Modern Slavery Act, however, we undertake spot checks of our suppliers as well as annual reviews of our actions and processes to ensure we meet and exceed best practices.

Training

Morgan Jones Limited ensure that any updates of legislation, changes to our code of conduct, or adjustment in best practices in relation to modern slavery and human trafficking are fed to all employees and all necessary and/or recommended training takes place.

All employees within Morgan Jones Limited are expected to comply with all laws and act in accordance with local guidelines and regulations and act with integrity and honesty.

All of our staff receive training and support that is appropriate to their role. In particular:

- Our leadership team receive detailed training in identifying and resolving concerns around modern slavery and human trafficking.
- Our recruiters and other department staff 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.

Training is refreshed annually.

Our Processes for Managing Risk

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 re-auditing a supplier or conducting spot checks.

After due consideration, we have not identified any significant risks of modern slavery, forced labour, or human trafficking in our supply chain. However, we continue to be alert to the potential for problems.

However, we have identified the following potential risks in our supply chain:

- One of our risks is identity fraud - this is mitigated by following best practices and guidelines set by the Home Office. Copies of ID documents are obtained, with online government approved IDSP checks carried out. Furthermore, fortnightly audits are conducted on random samples to ensure compliance.
- One of our risks is excessive overtime - this is monitored and mitigated by carefully recorded timesheets, client time reports, and communication with staff and site visits. All overtime is questioned and verified by our Accounts department prior to authorisation.
- One of our risks is underpayment - this is mitigated by monitoring the market rates and industry loadings and paying all personnel the National Living Wage as a minimum standard.
- One of our risks is financial fraud/servitude – this is monitored and mitigated by carefully recording and storing all bank details carefully and ensuring that personnel and workers have money sent to bank accounts in their own name. Where not possible and a 3rd party’s account is named we have strict processes and screening criteria as well as continuous monitoring.

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 abide by our code of supplier conduct, address modern slavery concerns in their policies, and (where necessary) publish a modern slavery statement.
- We collaborate with our suppliers in order to improve standards and transparency across our supply chain.
- 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 ensure that all of our suppliers are members of appropriate industry bodies and working groups.
- We work with the REC and the GLAA in order to combat the risk of modern slavery and human trafficking.

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

Our Performance

As part of monitoring the performance of Morgan Jones Limited, we track the following:

- We track 3rd party banking wage requests and have a protocol set up to minimise risk when asked to pay into 3rd party accounts.
- We carry out fortnightly RTW audit checks as an extra measure to ensure documents come in line with UK employment laws to reduce the risk of unwittingly partaking in slave labour activities by virtue of “fake documents”.

- We record and carry out regular RTW training and changes in law are communicated immediately with the administration and compliance department.
- A fortnightly report is submitted to the Ops Manager and Directorship feeding back any issues or results from RTW audits
- A lot of our clients are bound by stringent RTW and security checking protocols, therefore we are also bound to carry out RTW and security checks with government-approved services.
- We also run DBS background checks to minimise risk when placing into roles that require DBS standards to be adhered to. These by virtue will have a pre-requisite of RTW being adhered to by their very nature.

Based on the potential risks we have identified, we have also established the following key performance indicators, which are regularly assessed by the directors and senior leadership team:

- the percentage of suppliers who sign up to an appropriate code / provide their own modern slavery statements
- pass rate of our fortnightly right to work documentation checks
- the effectiveness of enforcement against suppliers who breach policies
- the amount of time spent on audits, re-audits, spot checks, and related due diligence
- the level of modern slavery training and awareness amongst our staff

We benchmark our indicators against industry best-practice, in order to ensure that we do not put undue pressure on our suppliers that might increase the potential for risk.

DATE OF REVIEW: 01/07/2024

REVIEWED BY: Chelsey Burt-Davies, Kim Tompsett, Anna Shelvey, Nicole Ramsey

NEXT REVIEW DATE: 01/07/2025

SIGNATURES:







