

## **James Gray Associates Ltd Modern Slavery & Human Trafficking Statement**

### **Introduction**

James Gray Associates Ltd recognises that all businesses have an obligation to prevent slavery and human trafficking and will do all in its power to prevent slavery and human trafficking within its business and within the supply chains through which it operates.

Modern slavery can take many forms including the trafficking of people, forced labour, servitude and slavery. We take our responsibility for supplying staff extremely seriously and are aware of the potential for being targeted by traffickers and unlicensed gangmasters. Our own processes around candidate engagement ensure our employees are alert to the signs of exploitation, in order that we may take the necessary action promptly and effectively should it be identified.

This statement highlights the steps we take to ensure compliance with the Modern Slavery Act 2015.

James Gray Associated Ltd can confirm that there is no slavery or human trafficking occurring within the organisation or its supply chains.

### **Organisation's Structure**

James Gray Associates Ltd are a leading provider of recruitment services across the UK. Our business consists of recruitment across the following three specialisms:

- Payroll
- HR
- Marketing

### **Our Supply Chains**

- Our supply chains include, but are not limited to, sourcing candidates for clients. This may involve the introduction by external agencies to James Gray Associates Ltd of candidates for onward supply to our clients. We expect our suppliers and potential suppliers to aim for high ethical standards and to operate in an ethical, legally-compliant and professional manner. We also expect our suppliers to promote similar standards in their own supply chain.

### **Our Policies including on Slavery and Human Trafficking**

- Suppliers are expected to adhere to the Modern Slavery Act 2015, and should have in place a policy recognising, respecting and protecting the human rights of their employees, those of their suppliers and business partners and the communities affected by the suppliers' operations.
- Employees should be free to choose to work for their employer and to leave the company upon reasonable notice.
- All employees must be provided with a clear contract of employment, which complies with legislation.
- All employees must be treated in a fair and equal manner and with dignity and respect.
- Any form of discrimination, victimisation or harassment on the grounds of marital or civil partnership status, sex (including gender reassignment), race (including colour, ethnic and national origin, nationality), disability, sexual orientation, having or not having dependants, religious belief or political opinion, age, trade union activity and offending background should be prohibited.
- All applicable laws and industry standards on employee wages, benefits, working hours and minimum age should be adhered to in all countries of operation, without any unauthorised deductions.
- Suppliers should observe the provisions of the International Labour Organization such that any young persons under the age of 18 should not be employed to work at night or for any hazardous work and their employment should not harm the young person's education, health or physical, mental, moral or social development. No young persons may be employed below the age of 16.
- All slavery and human trafficking laws must be complied with including, but not limited to, the UK Modern Slavery Act 2015.
- Suppliers must ensure their business operations are free from slavery and human trafficking practices whether in the UK or elsewhere, both internally and within their supply chains and other external business relationships. We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

**Due Diligence Process for Slavery and Human Trafficking**

James Gray Associates Ltd ensure strict compliance checks are carried for all candidates it supplies as part of our commitment to identify and eradicate slavery and human trafficking. Our compliance checks include verifying the identity of each worker and their right to work before supply commences.

All James Gray Associates Ltd employees have a process they can follow should they wish to voice any concerns. We are committed to protecting employees when disclosing malpractice and will ensure that all disclosures made in good faith will be treated confidentially and without fear of retaliation.

**Training**

All staff within James Gray Associates are expected to comply with all laws and act in accordance with local guidelines and regulations and act with integrity and honesty. We have undertaken to review our policies and procedures to ensure our colleagues have access to any additional information and support they may require with regard to human trafficking, forced labour, servitude and slavery.

Any issues or enquiries regarding our Modern Slavery Act 2015 policy should be issued to Nick Day, Managing Director who can be contacted at [nick@jgarecruitment.com](mailto:nick@jgarecruitment.com).

This statement is made to pursuant to Section 54 of the Modern Slavery Act 2015 and constitutes James Gray Associates' slavery and human trafficking statement for the current financial year.

Additional policies can be viewed at [www.jgarecruitment.com](http://www.jgarecruitment.com)