



Modern Slavery and Human Trafficking Statement

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Author: Crystina Woolley (Head of Quality and Talent)

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This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by Steps to Work / Starting Point Recruitment Ltd to prevent modern slavery and human trafficking in its business and supply chains.

Steps to Work / Starting Point Recruitment Slavery and Human Trafficking Statement

We are proud of the conditions of employment for all our employees throughout Steps to Work / Starting Point Recruitment. Given the nature of our business, the senior leadership team considers that there is minimal risk of Steps to Work / Starting Point Recruitment or our supply chains being in any way involved or complicit in slavery and human trafficking.

The employment and procurement practices operated by the businesses within Steps to Work / Starting Point Recruitment ensure that we are rightly viewed as an excellent and supportive employer and to the extent that our organisation operates as a purchaser of goods or services, we expect a high level of ethical conduct from those businesses with which we do business within our supply chain.

Organisation Structure

Steps to Work / Starting Point Recruitment is an employment and training provider since 1999.

Steps to Work (Walsall) Ltd / Starting Point Recruitment Limited is a registered charity (1100403). We provide training, advice and assistance to help people into work no matter their background, experience or skill level.

We work with both employers and job seekers to increase employment opportunities in the local area.

Steps to Work / Starting Point Recruitment supports customers to prepare for work and make the most of their skills and abilities. We offer a variety of services including:

- Information, advice and guidance on careers and skills
- Training to help with things like confidence building and motivation
- CV writing support and guidance
- Job search support
- Support with interview preparation
- Public internet access for job search and training activities
- Information advice and guidance on training and education opportunities
- Support to develop new skills

Our Supply Chain

Our supply chain enables us to help more people into work. Our partners are established public and private sector organisations that help us to deliver and maintain high quality job coaching, recruitment and skills development services. The aim of our partnerships is to join forces and expertise in offering a service that can seamlessly fit the needs and requirements of jobseekers, employers and skills learners alike. We work with a variety of established partners who are committed to the same high standards. This is validated through our due diligence processes and for those organisations that meet the threshold

of obligations under the section 54 (1) of the Modern Slavery Act 2015 we will support our partners to understand those obligations and statutory duties.

Anti-Slavery Policy Statement

Steps to Work / Starting Point Recruitment has zero tolerance to slavery and human trafficking and is committed to ensuring that there is no modern slavery or human trafficking in any part of our business. This Anti-Slavery Policy Statement is the principal articulation of the Steps to Work / Starting Point Recruitment stance on slavery and human trafficking. It is intended to inform and influence all the operational procedures within the organisation. Our stated Anti-Slavery Statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure (amongst our other priorities) that slavery and human trafficking is not taking place anywhere in our business or related supply chains.

Due Diligence and Implementation Processes

As part of our initiative to identify and mitigate risk (including in relation to that of human trafficking and slavery) we operate a range of policies and procedures appropriate to the different sectors of Steps to Work / Starting Point Recruitment. These include the policies and procedures in the following areas:

- Anti-Fraud and Corruption Policy
- Financial Regulations
- Whistle-blowing Policy
- Recruitment Policy
- Safeguarding Policy
- Equality & Diversity Policy

Steps to Work / Starting Point Recruitment also articulates a series of employee rights and benefits available to employees during the employee Inductions and Welcome Events and individual contracts of employment for each member of staff.

Steps to Work / Starting Point Recruitment operates a HR team led by the HR Manager and a Quality department led by the Head of Corporate Services. The company's Senior Leadership Team has reviewed and agreed to the term of this statement. A combination of procedures and functions operates to help identify, assess and monitor potential risk areas in our supply chains and mitigate the risk of slavery and human trafficking occurring in our supply chain.

Training

We will communicate this statement to all our staff to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business and in future will include references as part of the Company's training and information materials.

Legal and Regulatory Purpose of this Statement

This statement is made with regard to the obligations arising under section 54 (1) of the UK's Modern Slavery Act 2015 (the Act). Accordingly, this statement should be considered to constitute the slavery and human trafficking statement for Steps to Work / Starting Point Recruitment for the 2019 financial year and all future financial years until it may in future be modified or amended.

Crystina Woolley
Head of Quality and Talent
For and on behalf of Steps to Work (Walsall) Ltd / Starting Point Recruitment Limited