



**Recruitment Drive** (A Trading Division of Pineset Capital Limited)

[www.recruitment-drive.co.uk](http://www.recruitment-drive.co.uk)

## **MODERN SLAVERY POLICY**

1. Recruitment Drive is committed to eliminating modern slavery, human trafficking, forced labour, and similar human rights abuses.
2. Recruitment Drive is committed to ensuring that its staff and any workers it supplies (directly or indirectly) are not subject to behaviour or threats that may amount to modern slavery, human trafficking, forced labour, and similar human rights abuses.
3. Recruitment Drive provides appropriate training and awareness information for all of its staff.  
In particular:
  - All of our staff receives 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.
4. Any staff, workers or other parties are strongly encouraged to report any concerns or suspicions that they might have to Dominic Cura, the Managing Director.
5. Reports surrounding these issues are taken extremely seriously by our Managing Director or The Branch Manager, who are committed to ensuring that all investigations shall be prompt and effective. If our investigations reveal any issues, we are committed to taking appropriate action, including but not limited to:
  - Working with the appropriate organisations to improve standards,
  - Removing that organisation from our preferred supplier list,
  - Passing details to appropriate law enforcement bodies.
6. We regularly monitor our risks in this area through the use of relevant key performance indicators, including:
  - The percentage of suppliers who sign up to an appropriate code / provide their own modern slavery statements,
  - The effectiveness of enforcement against suppliers who breach policies,
  - The level of modern slavery training and awareness amongst our staff.
7. As part of our efforts in this area, we publish a modern slavery statement on an annual basis.
8. We would also recommend reading this in conjunction with our other policies, including our:
  - Corporate social responsibility policy,
  - Equal Opportunities policy,
  - Ethical procurement policy,
  - Anti-bribery / corruption policy, and
  - Whistle-blowing policy.

This policy was adopted on 20<sup>th</sup> August 2018 after being agreed by The Managing Director and the Branch Manager. It is reviewed annually.



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## MODERN SLAVERY STATEMENT

This statement is made as part of Recruitment Drive's commitment to eliminating the exploitation of people under the Modern Slavery Act 2015 (the Act). It summarises how Recruitment Drive 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, and relates to the financial year April 2018 to March 2019. The statement was approved by the Board of Directors on 20<sup>th</sup> August 2018.

**Mr DOMINIC CURA**  
Managing Director

### **1 Our Business**

Recruitment Drive is a Trading Division of Pineset Capital Limited operating in the recruitment sector. We provide introduction services and supply Permanent and Temporary workers and act as a master vendor in the Driving and Industrial sectors.

Pineset Capital Limited is an independent business.

#### **1.1 Who we work with**

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. Some of these work-seekers operate through their own limited companies. We do not supply work-seekers to hiring companies through any intermediaries. / Some of our work-seekers are supplied via other businesses, who facilitate providing them to the eventual hiring company.

The hiring companies that we work with are located in Greater London and surrounding areas. The Work-seekers and Workers we supply live in Greater London and surrounding areas.

#### **1.2 Other relationships**

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

- the Recruitment and Employment Confederation ([www.rec.uk.com](http://www.rec.uk.com)) and the Institute of Recruitment Professionals ([www.rec-irp.uk.com](http://www.rec-irp.uk.com))

### **2 Our Policies**

Recruitment Drive has a modern slavery policy as illustrated on page 1.

In addition, Recruitment Drive has the following policies which incorporate ethical standards for our staff.

- Terms of Engagement - signed by all Candidates that work for us
- Equal Opportunities Policy

#### **2.1 Policy development and review**

Recruitment Drive's policies are established by The Managing Director and the Branch Manager, based on advice from HR professionals, industry best practice and legal advice, and in consultation with The Recruitment and Employment Confederation. We review our policies annually, or as needed to adapt to changes.



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### **3 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. 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 address modern slavery concerns in their policies and 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.

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

### **4 Our Performance**

As part of monitoring the performance of Recruitment Drive, we track the following general key performance indicators:

Although we haven't identified any risks within our current client list we would adopt the following should they arise.

Based on the potential risks we have identified, we have also established the following key performance indicators, which are regularly assessed by The Managing Director and the Branch Manager:

- the percentage of suppliers who sign up to an appropriate code and provide their own modern slavery statements
- 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 carefully consider our indicators, in order to ensure that we do not put undue pressure on our suppliers that might increase the potential for risk.

### **5 Our Training**

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

- 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 actively encouraged to discuss any concerns that they have.

Training is refreshed annually or as an identified need arises - whichever is sooner.