



Modern Slavery and Human Trafficking Annual Statement

Signature:

Name/Position: Derek Skelton, Chief Executive Officer

Date: April 2024

Owner: Jayne Hambling, Head of Quality and Risk Management

Our Values



INNOVATION



PARTNERSHIP



EXCELLENCE



INTEGRITY



INTRODUCTION

This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes our Group's Slavery and Human Trafficking statement for the current financial year. Modern Slavery and Human Trafficking is the exploitation of individuals by others for commercial or personal gain. It includes:

- forced labour.
- human trafficking
- debt bondage / bonded labour
- descent based slavery (where individuals are born into it)
- child slavery
- forced and early marriage
- domestic servitude

People can find themselves trapped by modern slavery because they are vulnerable often through poverty and they can become particularly vulnerable when they are pushed into jobs with exploitative conditions.

Meridian Business Support Ltd (the Company) is an employment agency and employment business with a head office based in Manchester, UK. The Company employs c 200 permanent employees and engages up to 19,000 individual temporary workers annually.

Business Activity Risk

We have evaluated the Company's exposure to modern slavery in our supply chain. The nature of our business is such that we deal with temporary and often transient workforces within some of the sectors we deal with. This is particularly prevalent in relation to unskilled industrial, production, construction and healthcare environments where our workers may be more susceptible to Slavery and Human Trafficking when compared to other sectors of our business.

We do not source workers directly or indirectly from overseas or utilise overseas agents. We recruit workers already resident in the UK to UK based roles.

Supply Chain Risk

As an office based professional consultancy service who do not manufacture or produce goods we have a limited supply chain.

We have a small list of key suppliers limited primarily to the provision of:

- Payroll services and intermediaries (on a restricted PSL basis)
- IT hardware (laptops, printers/scanners) and software
- Telecoms (mobile and desktop)
- General office supplies
- Branded merchandise and workwear
- Web services
- Cleaning services

Suppliers are assessed prior to use and are required to complete a written and scored Modern Slavery Assessment. On agreeing to supply they are also required to agree to our



Supplier Code of Conduct and provide assurances of their approach to human rights. If we were to find any evidence that any of our suppliers had failed to meet their obligations in relation to the Modern Slavery Act 2015, we would investigate in full and require remedy where appropriate and we may also terminate our agreement with the supplier concerned.

DUE DILLIGENCE

Our approach is designed to:

- Identify and assess potential risk areas in our business.
- Mitigate the risk of modern slavery

Risk Identification

We conduct an annual risk assessment of our business to identify the areas in which our activities may be at increased risk of modern slavery. This includes mapping the sectors that we operate in, the skill level of the worker being placed, the volume of workers being placed, the attraction methods being employed to source the workers and other risk factors that may impact vulnerability of workers such as nationality and immigration status.

Risk Mitigation

Controls

To ensure adequate competence in understanding Modern Slavery we train all of our employees to identify signs of modern slavery and how to report any suspicions.

Operations Directors, Senior and Branch Managers undergo Stronger Together Tackling Modern Slavery in UK Business Training.

We have formed an internal Modern Slavery Team chaired by the Head of Quality & Risk Management who is responsible for the continuous improvement of our strategy and raising internal awareness of Modern Slavery.

The Modern Slavery Leads who sit on the Modern Slavery Team, along with Human Resource and Quality & Risk Management Team members have been trained in Investigative Interviewing techniques to be able to carry out welfare interviews at client sites as a monitoring exercise or in response to specific issues.

We provide information to workers via several formats including posters and leaflets and within our candidate registration packs and online via our website.

Policy, Procedures & Monitoring

We have Anti-Slavery & Human Trafficking and Human Rights Policies, and we have implemented standard procedures and recruitment practices companywide to ensure best practise in the way we recruit our workers. All our branches are subject to annual and ad hoc internal audits against those procedures.

We regularly interrogate our database and look for indicators of Modern Slavery including duplication of worker data including.

- Bank account details



- Addresses
- Emergency contacts & next of kin details
- Telephone numbers

Our Quality & Risk Management Team conduct investigations where necessary. Modern Slavery KPIs are reported to the Board monthly, and the indicators are shared companywide every month to track improvements and to ensure the issues are front of mind.

ACTIVITY AND ACHIEVEMENTS FOR FINANCIAL YEAR 2023/24

The Modern Slavery Team was formed in May 2023 with the purpose of continuously reviewing and improving our Modern Slavery Strategy. It comprises of members of all of the Company Business Units and representatives of our Human Resources and Quality & Risk Management Teams.

Through the work of this team in the financial year 2023/4 we:

1. Trained the Modern Slavery Team in Tackling Modern Slavery in UK Business through Stronger Together
2. Trained the Modern Slavery Leads in Investigative Interviewing Skills through Stronger Together
3. Held an Anti-Slavery Day client event and delivered Anti-Slavery posters to clients and prospects for use in their changing rooms and canteens.
4. Published internal quarterly newsletters to ensure Modern Slavery is on the companywide agenda
5. Published monthly forced labour KPIs internally
6. Installed a telephone, email and text Welfare Helpline for our workers
7. Published Welfare Posters for use in client sites and our branch locations in 9 languages with a QR code directing to a Welfare Helpline.
8. Commenced a programme of direct 'How are you being treated at work' texts to workers to identify potential areas of concern
9. Contracted with Clear Voice for an on-demand translation service to be able to hold welfare meetings and investigations with workers in their own language.
10. Updated Temporary Workers Handbook with Welfare Helpline details and resource information and published.

OBJECTIVES FOR 2024/5

The Modern Slavery Team will continue to drive improvements in our Modern Slavery Strategy

Current initiatives planned for 2024 include:

1. Maintaining a risk factor of Modern Slavery as reported in the monthly indicators to 3 or below
2. Ensuring 100% close out rate of all Modern Slavery indicators flagged every month
3. Ensure 100% remediation for temporary workers in our supply chain who have been subject to forced labour
4. Review Modern Slavery Training courses
5. Create POS (slides, brochureware etc) materials to introduce clients to our policies and processes
6. Devise an on boarding client questionnaire to be completed for all new clients in relation to their approach to Modern Slavery and their key personnel



7. Produce case studies
8. Ensure all client on sites have posters in place
9. Use data from text and surveying activity to devise programme of surveillance welfare interviewing

These objectives will be measured throughout 2024/5 and will be reported on in the new financial year in the annual Modern Slavery and Human Trafficking statement.