



Company Name:	ON-DEMAND PEOPLE (“the Company”)
Policy No.	
Policy Name:	Modern Slavery Policy
Date:	April 2024

ON-DEMAND PEOPLE is committed to developing and adopting a proactive approach to prevent, respond to and remediate the risks of modern slavery, forced and debt-bonded labour, human trafficking and hidden exploitation within its workplaces.

**Modern slavery** is a broad term used to encompass offences that involve one person depriving another person of their liberty, to exploit them for personal or commercial gain.

**Forced labour** is all work or service that is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily.

**Debt-bonded labour** is where a person’s labour is demanded as a means of repayment for a loan or service.

**Human trafficking** is the recruitment and transportation of persons by threat, force, coercion or other abuse of power or vulnerability to achieve the consent of a person having control over another person for exploitation.

**Hidden labour exploitation** is action up to and including modern slavery which involves the exploitation of workers and job applicants by internal or external individuals without the sanction or explicit knowledge of the employer or labour provider. It includes forced labour and human trafficking for labour exploitation; payment for work-finding services and work-related exploitation such as forced use of accommodation. It is understood that it is often well hidden by the perpetrators with victims if they perceive themselves as such, reluctant to come forward.

This policy applies to all Branches, Employees and Temporary Workers of ON-DEMAND PEOPLE.

### **Managing Risk**

As a responsible recruiter, ON-DEMAND PEOPLE takes its responsibilities to tackle Hidden Labour exploitation and Modern Slavery seriously and as such our Recruitment Processes are well placed to spot any signs of this. This includes our application pack and interview techniques. Common Details checks are also undertaken regularly to ensure that worker welfare remains one of our main focuses. As part of our worker registration, all workers are required to have their bank details and shared bank details are not permitted. Workers are required to provide their own RTW documents and are interviewed individually.

### **Due Diligence – Suppliers**

If we classify a supplier as high-risk, then we will conduct appropriate Due Diligence to ensure that the appropriate checks are taking place. If issues are found that could lead to instances of Modern Slavery and are not rectified, then the relationship will cease immediately.

### **Due Diligence – Applicants**

As recruiters, we are ideally placed to spot any signs of potential Modern Slavery cases early in the recruitment process. As a responsible recruiter, we have several processes in place to spot these signs.

### **Due Diligence - Worker**

Welfare Policies and processes developed by ON-DEMAND PEOPLE are in place to ensure that workers' safety is paramount once they have been placed out to work and we will only work with clients/Suppliers that follow these same principles.

### **Training**

As part of our onboarding procedure, all ON-DEMAND PEOPLE employees receive training on Hidden Exploitation and Modern Slavery. This gives them an understanding of what Modern Slavery is and how to spot the potential signs. It also explains what to do should they suspect that a worker is a potential victim of modern slavery.

### **ON-DEMAND PEOPLE commitments:**

- Complying with Human Rights legislation ensuring all employment is freely chosen.
- Precluding the use of child labour and ensuring that the minimum age for workers is consistent with national laws and regulations.
- Respecting the rights of temporary workers to join or form legally recognised trade unions of their choosing and to bargain collectively.
- At no point will ON-DEMAND PEOPLE retain the identity papers of any applicants or workers.
- Accommodation will not be sourced, provided, or recommended by ON-DEMAND PEOPLE, it is the sole responsibility of our workers to source their own.
- Accept that job-finding fees are a business cost and will not allow these to be paid by job applicants.
- Ensure that labour sourcing, recruitment and worker placement processes are under the control of trusted and competent staff members.
- Positively encourage and support employees and agency workers to report such exploitation which may be occurring within their communities.