

Modern Slavery Statement 2024-2025



Issued by:

Steven Bell
Governance Director

Julie Burnside
Managing Director

April 2024

Contents

	Page
1. Executive Summary	p.3
2. Introduction	p.4
3. About Us	p.5
4. Brightwork Organisational Structure & Supply Chain	pp.6-8
5. Policy Statement	p.9
6. Due Diligence	p.10
7. Training & Awareness	p.11
8. KPIs & Risk Assessments	pp.12-13
9. Collaboration & Communication	pp.14-15
10. Governance & Oversight	p.16
11. Spotlight on Best Practice	pp.17-18
12. Future Plans	p.19
13. Summary	p.20

1. Executive Summary

This statement reviews the actions outlined in Brightwork's Modern Slavery Statement (2023-2024), renews our commitments, and records our progress and future plans to continue tackling modern slavery and trafficking/exploitation.

We take pride in the progress and accomplishments we've made towards our objectives since our last statement. Together, these efforts have helped to further improve and strengthen the standards and controls within our business.

Some of the main highlights from the last year are outlined below:

1. Enhanced internal processes and procedures to mitigate risks, including the development of our comprehensive Quality Management System ('QMS') and achieving the ISO 9001 Standard in 2023.
2. Developed and reviewed stakeholder relationships, particularly within our supply chain.
3. Identified and reported new potential risk indicators to government authorities, receiving recognition for our insights and ongoing efforts in this area.
4. Conducted extensive education and awareness campaigns for all employees through various mediums.
5. Completed audits of our labour suppliers and implemented necessary actions.
6. Actively supported the Staffline Group ESG Committee and contributed to the production and publication of the 2023 ESG Report.
7. Achieved a silver EcoVadis rating, ranking Staffline in the top 15% of companies audited by EcoVadis in the last 12 months.

As a result of our policies, activity and vigilance, we were able to identify 103 potential victims of modern slavery, referring them to the appropriate channels and organisations in order to receive further support and assistance.

Many of these performance measures will be continued throughout 2024- 2025 and are detailed within this statement.

2. Introduction

Modern slavery is a criminal offence and has various guises such as slavery, servitude, forced labour and human trafficking. This violation of human rights is abhorrent and Brightwork has a zero-tolerance approach to modern slavery, exploitation, and human trafficking.

It is our responsibility to support our workers in their journey to enjoy safe and secure work environments. We believe working to prevent modern slavery is one of our highest priorities and we work alongside other businesses, charities and organisations that take this matter as seriously as we do. We are committed to preventing modern slavery in all our recruitment activities and our supply chain.

Brightwork has published annual Modern Slavery Statements for many years, outlining our aims, objectives, and preventative measures. Our commitment aligns with the Ethical Trade Initiative (ETI) base code guidance, and we continually review and improve practices in accordance with these standards. We strive to effectively consider the ETI 'Principles of Implementation' throughout our Modern Slavery Statement review, effectively implementing and utilising continuous improvement plans and review mechanisms throughout the year. We are, however, aware this is an ever-evolving crime, and its nature is complex and ever changing, we are committed to continuing to evolve with the support of our stakeholders and work proactively to identify and address these risks to ensure that all our recruitment activities are conducted ethically and in compliance with all relevant laws and regulations.

The economic impacts from Covid-19, and the ongoing global conflicts and crisis are still prevalent in our minds. The opportunities for humanitarian exploitation are heightened in these conditions and it therefore remains of utmost importance for Brightwork and its employees to remain vigilant of exploitation and modern slavery.

The UK Home Office released data at the end of 2021 stating **12,727** potential victims of Modern Slavery in the UK.
31% of people referred were British Nationals.
43% of these were children.

(Anti-slavery International 2024)

It remains true that these scenarios create opportunities for exploitation and modern slavery, where people are vulnerable and desperate to provide for themselves and their families and it is devastating to know that criminals see this as an opportunity to make financial gain. Exploiters do this by various means such as promising guaranteed work, housing, and transport, to name just a few. It is key we work together with other business, agencies, and stakeholders, to support those in need and prevent exploitation of anyone, especially those who are more vulnerable, and we believe that Brightwork has a wealth of opportunities for people to succeed in a safe, secure environment.

Our experience grows year after year, working closely with the Gangmasters Labour Abuse Authority (the 'GLAA'), the Home Office, the police forces across the country, and through collaborating and sharing insights with anti-slavery networks in all regions of the UK. Brightwork supports working together and actively contributing to the established networks to eradicate this criminal activity.

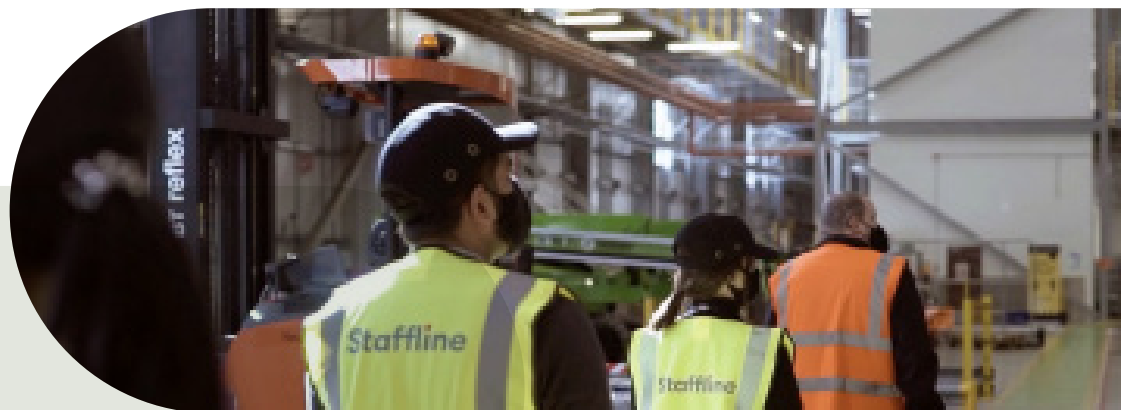
3. About Us

Established in 2006, Brightwork is Scotland's largest recruiter and workforce provider, delivering recruitment and workforce solutions to leading brands. We work together with our customers as an integrated business partner, operating at over 150 delivery sites across Scotland.

Brightwork focuses on helping business to find the right people for their organisation, while also helping candidates to find the right job opportunities. We have a team of experienced recruiters who are knowledgeable about various industries and can provide expert advice and support throughout the recruitment process.

As a trusted and reliable recruitment agency, Brightwork provides customised recruitment solutions to meet the unique needs of each customer, which are underpinned with our compliance and ethical standards throughout the recruitment journey and worker experience. Our focus is to help businesses to find the right people for their organisation, while also helping candidates to find the right job opportunities. We have a team of experienced recruiters who are knowledgeable about various industries and can provide expert advice and support throughout the recruitment process.

Our services are supported with innovate technologies which include Staffline's bespoke candidate/worker management tool 'Universe', our industry-leading customer experience management programme and survey tool 'Have your Say', and our integrated AI chat bot technologies which offer assistance and promptly addresses inbound queries, ensuring our candidates and workers are directed to the appropriate destination on their first attempt.



4. Brightwork Organisational Structure & Supply Chain

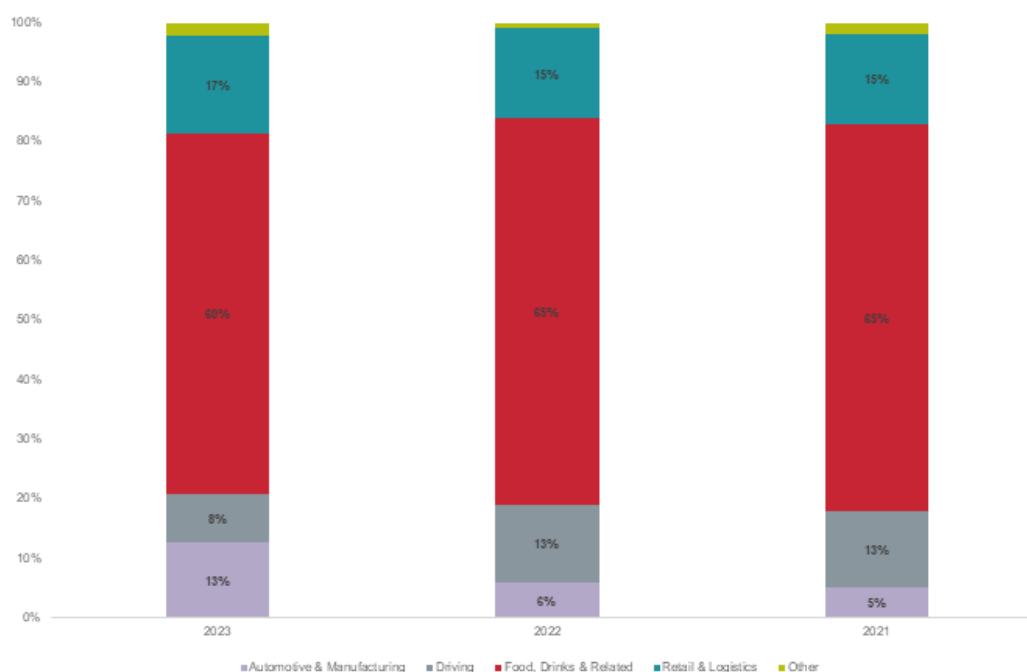
Brightwork is a Scotland-based recruitment agency that specialises in providing recruitment and workforce management solutions to businesses in various industries. With branches located in Glasgow and Elgin, we support our customers from the Borders up to the Central Belt, spanning across to the Western Isles and extending to the most northerly points of Scotland. Providing on-site solutions services to 20+ locations across the Central Belt, we have a permanent presence within our customers' sites, providing a dynamic and flexible resourcing service, on location, right at the heart of their businesses.

Brightwork is a subsidiary of Staffline Recruitment GB; one of four divisions along with Datum RPO, PeoplePlus and Staffline Recruitment Ireland, which form Staffline Group Plc. For more on our structure please visit here: [Staffline | Home \(stafflinegroupplc.co.uk\)](https://www.stafflinegroupplc.co.uk)

We have 50 recruitment suppliers, the majority of which are registered in the UK. Those that are not based in the UK are EU based and hold a UK Gangmaster Licencing Abuse Authority (GLAA) licence to operate in the UK. All suppliers are audited at the point of our initial engagement and then annually on an ongoing basis.

Staffline & Brightwork Supply by Sector 2021 – 2023:

Sector(s)	2023	2022	2021
Automotive and Manufacturing	13%	6%	5%
Driving	8%	13%	13%
Food & Drinks (and related)	60%	65%	65%
Retail and Logistics	17%	15%	15%
Other	2%	1%	2%



Our Focus

Brightwork is committed to delivering a range of private and public services to find and support people into employment and develop skills. We do this through fair and clear terms, development opportunities, an equal opportunities policy for all, and safe, respectful, clean, and healthy work environments.

Our Values



Brightwork's goal is to support people into good work to enable our workforce and our customers to fulfil their goals and aspirations. We achieve this through our company values and our human-centric approach, and this is embedded in our daily behaviours and our work with stakeholders.

At the heart of our business are the individuals we support into work; for example, by implementing AI technology we have improved our job search facilities to support the individual to 'Find Me Work', and we will continue to innovate. These dynamic solutions allow us to focus on an individual's journey, identify any concerns, and to provide support along the way.

We have a forward-thinking and market-leading People team who work hard to help embed the culture of Staffline, promoting important topics such as Women in Leadership, Pride Month, Mental Health Awareness, Neurodiversity Celebration Week, and Anti-Slavery campaigns.

In 2023, one of our key objectives was to strengthen our relationships and collaborative partnerships with charitable organisations. Survivors of Human Trafficking in Scotland (SOHTIS) were selected as Brightwork's partner charity, and our team has invested time in learning about the work that SOHTIS do to support survivors. The Brightwork team were joined by SOHTIS to create weaved upcycled scarfs which became part of their creative artworks being displayed to encourage people to look out for those affected by human trafficking and modern slavery.

Scotland Against Modern Slavery ('SAMS') is fully funded and operated by Brightwork and Staffline as a joint initiative with Police Scotland, the GLAA, and the Scottish Government. 56 businesses have joined this initiative from across the Scottish business community, with the core aims of:

1. Raising awareness of the issue of exploitation in the business community in Scotland and sharing best practice.
2. Supporting survivors with full time good work with the corporate partners.
3. Raising awareness with those communities who are vulnerable to exploitation.

In 2023, SAMS facilitated in excess of 15 round table events, covering various topics, which are illustrated through some of the examples shown below.

Example 1

The SAMS round table event which discussed the growing issue of exploitation in the care sector with Dame Sara Thornton (former Anti-Slavery Commissioner) and Phil Cain (Director of Operations at the GLAA), which was run with Scottish Care (Representative Body for the Care sector in Scotland).

Example 2

The SAMS team presented to Holyrood Secondary School pupils in Glasgow; a diverse area which has a high level of social deprivation. There were sadly a number of pupils that reported to the school that their parents were in exploitative situations following this SAMS event.

Example 3

The SAMS team (who are all Brightwork employees) presented to over 130 Hong Kong Nationals who had arrived in Scotland via the British Nationals Overseas arrangement. This event was held to help educate them on the PAYE system, how to find a job, provided CV advice, and general employment guidance as they were at risk of exploitation due to a lack of knowledge in these areas.

5. Policy Statement

Brightwork has a zero-tolerance approach to modern slavery and human trafficking in all our operations and supply chains. We acknowledge that slavery and human trafficking are serious human rights abuses that have no place in modern society.

We will conduct our business with integrity and will not knowingly support or deal with any business involved in slavery or human trafficking. We expect our suppliers, contractors, and other business partners to share our commitment to preventing slavery and human trafficking.

To fulfil our commitment, we will:

1. Conduct due diligence checks to identify and assess potential modern slavery risks in our operations and supply chains.
2. Take appropriate action to address any identified risks and work with our suppliers and partners to improve their practices.
3. Provide training to our employees and suppliers to increase awareness of modern slavery and how to identify and report any potential cases.
4. Support our customers and suppliers by sharing our experiences to help with their employee awareness and policy/processes development.
5. Encourage and support the reporting of any suspected cases of modern slavery and human trafficking.
6. Regularly review and monitor our policies and practices to ensure that they remain effective in preventing modern slavery and human trafficking.
7. Protect our employees; against any human rights violations, their freedom of movement and association, against unfair recruitment practices and ensure they have access to internal and external grievance mechanisms.

We are committed to continuously improving our efforts to prevent modern slavery and human trafficking and to comply with all relevant laws and regulations. Our company policies are hosted on a live environment for all employees to access at any time and are supported with the additional awareness-checking learning materials on our learning experience platforms. Our policies support our commitment to protect human rights and eradicate modern slavery and unethical practice.

6. Due Diligence

We carry out due diligence checks on all our labour suppliers of temporary and permanent workers to ensure that they comply with our ethical standards and values. Brightwork will take appropriate action if any non-compliance is identified.

We conduct rigorous due diligence checks on all our labour suppliers, both for temporary and permanent workers, to ensure alignment with our ethical standards and values. In cases of non-compliance, Staffline takes decisive action to address any issues identified.

Our commitment extends to reviewing all suppliers to Brightwork, supporting them in achieving the same high standards and values we cherish. We actively support these organisations in various capacities most significantly educating and signposting to raise awareness of modern slavery and conducting risk-based assessments aligned with the Government's Modern Slavery Assessment Tool ('MSAT').

Brightwork has developed and implemented a comprehensive Quality Management System and achieved ISO 9001 Standard certification during 2023. Our suite of policies encompasses human rights, modern slavery, human trafficking, and recruitment practices.

We're proud that our parent company Staffline has achieved a 'Silver Medal' EcoVadis rating in 2024, placing us among the top 15% of companies assessed within the last year. Looking ahead, we are preparing for ISO 14001 (environmental management systems) and ISO 27001 (information security management systems) Standards certification during 2024 and plan for these to be achieved in 2025.



7. Training & Awareness

Our Worker Handbook is an important communication tool, providing essential information to our workers including how to seek assistance when needed. Since 2022, our Worker Handbook has been professionally translated and made available to all workers in the following languages: English, Bulgarian, Gujarati, Hindi, Hungarian, Latvian, Lithuanian, Polish, Portuguese, Romanian, and Slovak. We reviewed and updated the Worker Handbook during 2023 to strengthen the Modern Slavery references and information and included some signposting advice for workers.

Brightwork is committed to providing all employees with training on identifying indicators and risks of modern slavery and human trafficking. Our 'red flags' approach, developed over years of experience, is disseminated through various communication channels such as our website, social media platforms, and associated marketing materials. This initiative educates individuals on recognising and reporting suspected cases, fostering a culture of open reporting even in instances with limited evidence. Our training and 'red flags' framework align with the International Labour Office's 'ILO Indicators of Forced Labour'.

Any suspicions of modern slavery are promptly reported to our Compliance team, comprising experienced professionals with backgrounds in law enforcement and regulatory compliance, including the Gangmasters Labour Abuse Authority (GLAA). This team conducts thorough and impartial investigations, following up on intelligence leads or complaints to safeguard worker welfare and ensure Brightwork's compliance with regulations. Additionally, members of our Compliance Investigations team undergo training, including the Stronger Together Advanced Tackling Modern Slavery in Business course, to enhance their expertise in addressing modern slavery issues. The quality of our intelligence sharing was acknowledged by the Home Office during 2023.

Brightwork prohibits any form of payment from employees or workers for employment purposes, as well as retention or withholding of personal identity documents. We unequivocally reject forced or bonded labour practices. Allegations of such actions are diligently investigated by our independent Compliance Investigations team. Furthermore, we conduct awareness campaigns targeting our potential workforce to educate and raise awareness about potential scams and criminal behaviours, furthering our commitment to combating modern slavery in all its forms.

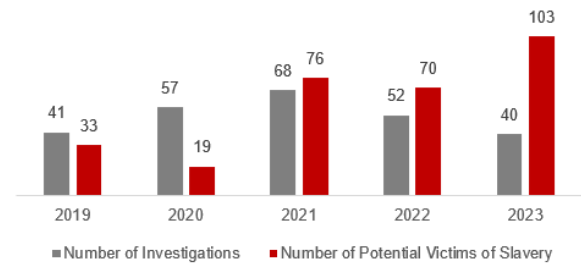


8. Key Performance Indicators (KPIs) & Risk Assessments

Brightwork monitors and reports on our efforts in preventing modern slavery and human trafficking in our recruitment activities. We regularly review our policies and procedures to ensure that they are effective in addressing these risks, conducting both internal and external risk assessments. Our partnership with the ‘Stronger Together’ initiative facilitates an external risk assessment, ensuring comprehensive coverage in our risk mitigation strategies.

A crucial measure of our success lies in the number of investigations conducted and potential victims of modern slavery identified within our business. Given the scale and scope of Staffline’s operations, we recognise the likelihood of being targeted by criminals seeking to exploit our business. The consistent review of cases over the years, detailed below, underscores our commitment to delivering robust training to detect, report, and prevent this abhorrent crime:

Year	Number of Investigations	Number of Potential Victims of Slavery
2019	41	33
2020	57	19
2021	68	76
2022	52	70
2023	40	103



In 2023, we noted that potential victims of modern slavery or exploitation were identified through various investigations, such as Right to Work inquiries. In order to ensure that we are reporting accurately and liaising effectively with external agencies and enforcement authorities, we use different categories within our data to support the analysis process. The above table does not cover all investigation matters, these figures are for potential modern slavery and worker exploitation cases only (Staffline and Brightwork in total).

All investigations are carefully logged on our centrally managed systems, and we conduct regular reviews of reporting mechanisms to enhance awareness and accessibility. This includes scrutinising grievance mechanisms, whistleblowing reports, and stakeholder feedback to foster collaboration and prompt action.

Furthermore, we prioritise delivering modern slavery training to all staff through our enhanced IT systems, ensuring a timely and equitable approach. Our target of maintaining at 100% training delivery throughout the year is strongly supported by our IT infrastructure.

In addition to the above indicators, we closely examine multiple modern slavery indicator reports to pinpoint areas of concern. In 2023, we initiated monitoring of the time required to resolve cases, an ongoing project in 2024. We are developing training programs to enhance efficiency and effectiveness in handling investigations, underpinning our unwavering commitment to combating modern slavery in all its forms.

The table below shows measures implemented by Brightwork and Staffline in recent years and provides some commentary on the status of each measure and future or ongoing actions being progressed:

Measure	Commenced	Status	Concluded Actions	Ongoing Actions
Conduct due diligence checks to identify and assess potential modern slavery risks in our operations and supply chains.	2021	Ongoing	Modern Slavery Gap analysis conducted in 2021 actions identified and risk rated. Hotspots targeted and addressed. Due diligence checks undertaken at the point of onboarding.	A review of the analysis to be conducted in 2024. Risk rating reviewed at issues addressed.
Take appropriate action to address any identified risks and work with our suppliers and partners to improve their practices.	2022	Ongoing	Labour suppliers reduced and audited with a full review completed of the audit process during 2023. Suppliers contacted to review practices and audit Modern Slavery commitments.	Improve standards through education and training across our supply chain to ensure consistency and effectively map risk. Update our standard terms and conditions to include contractual commitments.
Provide training to our employees and suppliers to increase awareness of modern slavery and how to identify and report any potential cases.	2020	Annually & Ongoing	Achieve 100% completion of annual training for employees. Create and distribute materials to further knowledge of modern slavery and exploitations (such as our Red Flags material, and Anti-Slavery Day campaign materials).	Review available tools and materials for targeted stakeholders to ensure modern slavery awareness and training is embedded.
Support our customers and suppliers by sharing our experiences to help with their employee awareness and policy/processes development.	2020	Ongoing	Developing and maintaining key relationships with customers is and will always be ongoing. Connected with third party vendors to discuss and review modern slavery awareness.	Arrange training session to raise awareness, share case studies and build contacts within target hotspot areas.
Encourage and support the reporting of any suspected cases of modern slavery and human trafficking.	2021	Ongoing	Created control logs to monitor and develop insights into investigations. Raising awareness and support to encourage reporting via training and educational tools has been evident in the number of internal cases reported (2021-2022 saw a 6.6% increase, 2022-2023 saw a 42.4% increase*).	Continue to encourage and train staff and workers to raise reports for all suspicious activities. Drive increases in reporting figures by promoting teamwork and communication.
Regularly review and monitor our policies and practices to ensure that they remain effective in preventing modern slavery and human trafficking.	2020	Ongoing	Quality Management System developed and implemented; ISO 9001 Standard achieved in 2023.	Ensure effectiveness and relevance of policies across the business and maintain the ISO 9001 Standard certification.
Protect our employees; against any human rights violations, their freedom of movement and association, against unfair recruitment practices and ensure they have access to internal and external grievance mechanisms.	2020	Ongoing	Developed the worker handbook and published in other languages to support accessing help and reporting mechanisms. Ensure adequate training is provided and campaigns are accessible.	Attend hotspot areas with the support of customers to directly access workers to educate and inform of indicators and internal and external reporting mechanisms.

*Internal reporting was for all case types not purely with a modern slavery focus.

9. Collaboration & Communication

We communicate regularly with our suppliers, customers, and stakeholders to ensure that they are aware of our commitment to preventing modern slavery and human trafficking in our recruitment activities. Collaboratively, we identify and address any risks and share best practice. Our experienced team often spend time with HR and management teams beyond Brightwork to help broaden awareness, identify support functions and effective processes.

Working closely with the Gangmaster and Labour Abuse Authority and other authorities, we promptly report all cases or suspicions of modern slavery or offences. This has resulted in Staffline, our parent company, being acknowledged in several cases for the intelligence and support provided to the authorities and the individuals involved. From the significant amount of intelligence sharing, led by Staffline's Compliance Investigations team, in excess of 15 cases have progressed during 2023 with criminal proceedings now being pursued.

We work continuously to try and prevent unlicensed gangmasters from infiltrating our business and exploiting our workers and regularly engage with authorities and charities to tackle modern slavery, including Migrant Help, Hope for Justice, City Hearts, various local councils, and local Police teams. Additionally, we actively participate in the 'Stronger Together' initiative, utilising the Responsible Recruitment Toolkit to keep modern slavery high on ethical agendas.

In supporting victims identified, Staffline and Brightwork collaborate with enforcement authorities and charities to ensure appropriate support and a victim-centric approach. The impactful collaboration with supporting charities has facilitated the successful employment of 46 survivors of modern slavery since 2020. Moreover, we organise case reviews with the Police and Gangmaster and Labour Abuse Authority, where appropriate involving other labour suppliers and customers, to collectively enhance learning opportunities. Staffline's diligence in tracking and reporting fraudulent documentation to the appropriate authorities, coupled with awareness of potential coercion and control factors for those applicants, has led to at least 2 arrests and prosecutions in 2023 alone.

9. Collaboration & Communication (cont.)

Our compliance reports provide valuable insights that we actively share these with local authorities. These insights include indicators of potential modern slavery or exploitation, such as illegal houses of multiple occupancy, overcrowding, shared bank account details, and telephone numbers. Our proactive approach has contributed to preventing worker welfare issues and the apprehension of abusers.

As business partners with the Stronger Together initiative, we support their work in helping businesses understand modern slavery and their practical guidance on implementing relevant checks throughout our organisation. The majority of our Compliance Investigations team and our Governance Director have completed the Stronger Together Advanced Tackling Modern Slavery in UK Businesses course and various other training and tools available. We have completed and adhere to the Labour Provider/Recruitment Business Good Practice Implementation Checklist, and review this annually.

Additionally, Staffline's collaboration with anti-slavery partnerships across the country provides direct access to first responders, authorities, intelligence, and support. Our active involvement in these partnerships leverages our extensive reach as a large recruitment company, offering invaluable opportunities to combat modern slavery effectively.



10. Governance & Oversight

We have established robust governance and oversight mechanisms to ensure that our policies and procedures are effectively implemented, and to monitor our performance in preventing modern slavery and human trafficking. Brightwork's Governance Director holds responsibility for ensuring compliance with our modern slavery statement and to oversee the implementation of our policies and procedures.

All our policies reflect the principles of safeguarding the welfare of our workers. Upholding their wellbeing is at the core of our business and reflected within all processes and management arrangements. We are committed to constantly improve our processes, strengthening them, and implementing new checks as we gain insights into evolving tactics utilised by traffickers to infiltrate businesses like ours and those around us.

Investment in our IT systems enables us to run checks across our database and supporting platforms, this helps in providing valuable information to enforcement authorities promptly and accurately. Furthermore, the application of structured data within our reporting tools is allowing for greater levels of automation and has helped Staffline create 'insight dashboards' using innovative management information software packages. The outputs of this work mean that our internal teams are able to focus more of their time and energy on investigations and follow-up activities, and thus our impact of this data will strengthen over time.

Internal audits ensure that modern slavery information is prominently displayed in all our offices and sites, and that staff are familiar and compliant with Staffline policies and processes designed to protect worker welfare.

We maintain a centralised repository of company policies, ensuring all our staff have access to and visibility of company policies. Regular reviews and communications, via multiple digital methods, policy updates and company principles ensure we keep our staff informed of policy updates and company principles. During 2023, Brightwork implemented its Quality Management System and achieved ISO 9001 Standard certification.



Our internal reviews drive continuous improvement plans including updating our Modern Slavery Statement and all supporting policies and procedures, to comply with the UK Government statutory guidance to cover six key pillars. We are committed and driving effective, meaningful change to continue to tackle modern slavery across our business.

The internal Compliance Investigations team conducts root cause analysis and implements continuous improvement measures and training across our company. Where appropriate we endeavour to remedy and support any individuals to seek justice and compensation.

11. Spotlight on Best Practice

Our Brightwork business operating in Scotland is a subsidiary of Staffline Recruitment GB and has grown to become Scotland's largest recruitment agency, providing over 5,500 workers each week across a huge range of Scottish industries. Brightwork serves as the sole supplier of temporary industrial labour for the 3 largest drinks producers in Scotland, and its support extends to food production and logistics customers throughout the country, enabling us to mobilise the largest temporary workforce in Scotland.

In 2017, Brightwork founded Scotland Against Modern Slavery ('SAMS') with the focus being to raise awareness of modern slavery in the Scottish business community. Today, SAMS partners with governmental bodies such as the Scottish Government, Police Scotland, the Gangmasters Labour and Abuse Authority, Migrant Help, and several other NGOs, charities, and 56 corporate partners across Scotland.



The Scottish Government's Human Trafficking and Exploitation Act 2015 provides further legislative grounding in Scotland and, through SAMS, Brightwork collaborates with the Scottish Government's Human Trafficking Team to ensure that the Scottish business community is aware of this.

Working closely with Migrant Help, Refugee Sanctuary Scotland ('RSS'), and Survivors of Human Trafficking in Scotland ('SOHTIS') Brightwork has committed to help find work for rescued victims through our client and community relationships. Director, Shan Saba, serves as a Trustee for the Refugee Survival Trust charity which provides refugees and people seeking asylum with practical support when it's most needed, building connections and campaigning for change.

Many of RSS's service users remain ineligible for work in the UK whilst they navigate the Home Office asylum process. Often their workplace skills have been eroded, they are destitute and highly vulnerable to exploitation. On behalf of the Trust, SAMS runs educational workshops to prepare these people to become 'work-ready', helping them to recognise exploitation and identify what 'good work' is, and what good employers looks like.

In 2024 the SAMS movement enters its eighth year with all 56 corporate partners committed to playing their part in eradicating human trafficking and modern slavery by sharing good practice and intelligence across the corporate sector, assisting victims in Scotland by finding them sustainable work and helping them to thrive as they settle into new lives. Each organisation within the Corporate Partner group has an appointed ambassador whose remit is to take a lead role within their respective organisations, delivering the Scottish Government's Human Trafficking and Exploitation Team strategy, ensuring they exemplify best practice and generating awareness of modern slavery to their stakeholders and other businesses across Scotland.

11. Spotlight on Best Practice (cont.)

SAMS organises and hosts monthly roundtables, boosted by regular, topical podcasts broadcast via Brightwork, assisted by guests and speakers ranging from the former Independent Anti-Slavery Commissioner, the First Minister for Scotland, and a former UK Prime Minister. The roundtable events are open to all Corporate Partners and invited guests and the aim of these, along with the supporting podcasts, is to continue to shine the light on emerging trends of perpetrators, live examples of new cases arising, government and public organisation activities, potential supply chain considerations and of course sharing best practices and business strategies.

The Scottish Government's Trafficking and Exploitation Strategy Annual Progress Report highlights Brightwork's contribution via our work in developing SAMS, helping to inform and share best practice about human trafficking and exploitation throughout the business community in Scotland, acknowledging SAMS' success in raising awareness and supporting victims has been integral to the government's future strategy.

For further information on SAMS, please visit: <https://www.scotlandagainstmodernslavery.co.uk/>

Case Study

In 2023, Brightwork played a pivotal role in supporting two sisters who had fallen victim to exploitation and debt bondage. Originating from South Asia, they journeyed to pursue employment at a care home through a Visa scheme. Both sisters completed their applications and Visas correctly, possessing exceptional English language skills and relevant prior experience.

An individual from South Asia, employed within the care home, informed them of the job opportunity but ensnared them in debt bondage by charging £5,000 each for the positions. Additionally, the sisters' parents incurred significant debts with unscrupulous lenders to cover their travel and other expenses.

Upon arrival, the individual reneged on the promised roles, redirecting them to work in a shop. Neither of the women felt they had any other choice and had an unsurmountable debt to settle, so they moved and began work in a shop. Fortunately, the shop owner recognised several 'red flags' and assisted the sisters in identifying their true sponsorship details and locating the intended care home.

Concerned about the dubious recruitment process, the care home along with the sisters contacted the Police, which in turn lead them to a legal support charity specialising in immigration and modern slavery cases. With assistance, they applied to remain in the UK through the Government Modern Slavery National Referral Mechanism, successfully obtaining grounds to stay.

Brightwork intervened to secure safe and reliable employment for the sisters, facilitated through one of SAMS' 56 corporate partners, a well-known care provider in Scotland. In June 2023, they commenced their roles and have since thrived and flourished. It was heartening to learn that in early 2024, they were able to visit their family in for a holiday, reflecting their happiness and integration into the care team and their life in the UK.

12. Future Plans

We are committed to continuously improving our efforts to preventing modern slavery and human trafficking in our recruitment activities. Regular reviews of our policies and procedures enable us to take appropriate action to address any identified risks or areas for improvement.

In 2019, we launched our campaign to encourage workers to know their rights and understand what to expect from working in the UK. This ongoing initiative has strengthened every year, and it continues to increase awareness across our workers, fostering a culture that supports individuals to feel empowered to report any exploitative practices either experienced personally or witnessed.

At Brightwork, we place great importance on the role we play in helping to support local communities and protecting the environment. Our overarching strategy is articulated within our annual Environmental, Social and Governance (ESG) report. We believe that ESG should not be a standalone compliance exercise and we recognise the importance of integrating our ESG objectives to our corporate and governance strategies. This includes our commitment to tackling modern slavery and hidden labour exploitation within our own business, and with those with whom we work.

Representatives from our ESG Committee have extensive knowledge of the Group and the businesses within it to ensure our ESG strategy is linked to our wider business strategy and remains industry relevant. Staffline Group’s ESG report can be found here:

[https://www.stafflinegroupplc.co.uk/about-us/environmental-social-governance/.](https://www.stafflinegroupplc.co.uk/about-us/environmental-social-governance/)



13. Summary

Modern slavery and trafficking are multifaceted global problems and, with the links to many criminal organisations, it remains a high risk to any supply chain or business.

Brightwork will continue its investment in the identification and prevention of modern slavery; it remains a high priority for the business and that of our valued customers.

We remain fully committed to compliance and high levels of ethical standards and strive to do more to help rescue potential future victims of modern slavery.

Whilst we have established well tested successful processes embedded in Staffline, we will continually review and strengthen using knowledge learnt and intelligence shared.

We are reassured that the scale of our business can be extremely helpful to link with our partners outside of our industry to help tackle modern slavery and raise awareness across all regions of the UK, and we welcome all partnerships and will always do what we can to help protect workers from this horrific crime.

Keeping the communication channels open to encourage our workers to approach us any time to have the confidence to report exploitation and using our internal learning platforms, our ISO 9001 certified Quality Management System, and our SharePoint tools to help escalate messages throughout our business to keep the conversations flowing will be key to engage more internally.

Brightwork will continue to assess our risks and transparency throughout our business to identify and establish a company-wide compliant approach to modern slavery management.

This Modern Slavery Statement (2024-2025) was approved by the Managing Director of Brightwork and the Board of Directors of Staffline Recruitment Limited in April 2024.



A handwritten signature in black ink, appearing to read 'S Bell'.

Steven Bell
Governance Director
Staffline Recruitment Ltd



A handwritten signature in purple ink, appearing to read 'Julie Burnside'.

Julie Burnside
Managing Director
Brightwork Ltd