



Modern Slavery Policy

Gray Agency Ltd t/a Gray & Associates Recruitment Services hereby referred to as G&A

1. G&A is committed to eliminating modern slavery, human trafficking, forced labour, and similar human rights abuses.
2. G&A 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. G&A provides appropriate training and awareness information to all staff and workers. In particular:
 - Our Directors and Senior Managers receive training in identifying and resolving concerns around modern slavery and human trafficking.
 - 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.
 - All our temporary workers 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 their consultant.
4. Any staff, workers or other parties are strongly encouraged to report any concerns or suspicions that they might have to a Senior Manager at G&A and/or the Directors of G&A.
5. Reports surrounding these issues are taken extremely seriously by the Directors 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 an 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 level of modern slavery training and awareness amongst our staff and workers.
7. As part of our efforts in this area, we publish a modern slavery statement on an annual basis. This policy will be reviewed yearly, or when a relevant legislation change takes place, whichever is earlier.



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Modern Slavery Statement

This statement is made as part of G&A's commitment to eliminating the exploitation of people under the Modern Slavery Act 2015 (the Act). It summarises how G&A operates, the policies and processes in place to minimise the possibility of any problems, any risks we have identified, how we monitor them, and how we train our staff.

Our Business: G&A is a private limited company operating in the recruitment sector. We provide introduction services for permanent, FTC and temporary staff and supply temporary workers to the public and private sector.

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.
- The hiring companies that we work with are located in the UK.
- The work-seekers we supply live in the UK.

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

- The Association of Professional Staffing Companies (APSCo) <https://www.apscouk.org/>

Our Policies: G&A Ltd has a modern slavery policy which is set out above. In addition, G&A has the following policies which incorporate ethical standards for our staff and our suppliers.

- Good Supplier Agreement
- Equality & Diversity Policy
- Anti-Bribery Policy Policy

Development and review: G&A's policies are established by our Directors, based on advice from HR professionals, industry best practice via the Association of Professional Staffing Companies and legal advice. We are also audited to ISO 9001 which ensures an annual audit and review of risks and policies. We review our policies annually, or as needed to adapt to changes.

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 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.

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 abide by our Good Supplier Agreement.
- Only senior members of staff who have undergone appropriate training for assessing modern slavery risks in the supply chain are authorised to sign contracts
- We collaborate with our suppliers in order to improve standards and transparency across our supply chain.
- Our staff are encouraged to bring any concerns they have to the attention of management.

Our Performance: As part of monitoring the performance of G&A, we track the following general key performance indicators, which are regularly assessed by our Directors:



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- The percentage of suppliers who sign up to an appropriate code and/or provide their own modern slavery statements,
- The level of compliance and transparency we have established in our supply chain.
- The level of modern slavery training and awareness amongst our staff and workers.
- The speed at which we investigate related complaints, and the effectiveness of any whistle-blowing procedures

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.

Our Training:

- Our staff receive training and support that is appropriate to their role.:
- Our Directors and Senior Managers receive training in identifying and resolving concerns around modern slavery and human trafficking.
- 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.
- All our temporary workers 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 their consultant.

As part of this, our staff are encouraged to discuss any concerns that they have with their manager or a Director. Training is refreshed annually or as needs require.

This statement is published in accordance with section 54 of the Act, and relates to the financial year Jan 2023 to December 2023

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