

Austin Dean Recruitment doesn't meet the minimum turnover requirements, as stipulated in the Regulations under section 54 ("Transparency in supply chains etc.") of the Modern Slavery Act 2015 ("the Act") However as best practice and our own ethical guidelines we fully support the Governments objectives to eradicate modern slavery, this policy reflects our stance:

POLICY NAME: MODERN DAY SLAVERY	
Policy #	1
Summary	This Policy fully supports the Government's objectives to eradicate modern slavery and human trafficking and recognises the significant role the NHS has to play in both combatting it and supporting victims. In particular, we are strongly committed to ensuring our company and supply chains and business activities are free from ethical and labour standards abuses.
Responsible Person	Kaitlin Walsh
Accountable Director	Maqsood Bagas
Applies to	All staff, contractors, workers
Equality Impact analysis	Passed
Date of Approval	03/02/22
Version	1.1
Available on	PDF
Related documents	Corporate Social Responsibility Policy, Environmental Policy Anti-bribery / corruption policy, Whistleblowing policy
Disseminated to	All directly affected staff
Date of next formal review	03/12/2025

DOCUMENT CONTROL	VERSION	ACTION	AMENDMENTS
Feb 2021	1.0	Policy first implemented	N/A
Feb 2022	1.1	Formal Review	Contents page added, Control sheet added

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Introduction

1. BECS UK Limited, T/A Austin Dean Recruitment is committed to eliminating modern slavery, human trafficking, forced labour, and similar human rights abuses.
2. Austin Dean Recruitment 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. Austin Dean Recruitment provides appropriate training and awareness information for all of its staff.
In particular:
 - Our leadership team receive detailed 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.
4. Any staff, workers or other parties are strongly encouraged to report any concerns or suspicions that they might have to the Director of Operations.
5. Reports surrounding these issues are taken extremely seriously by our senior leadership team, 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 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,
 - Ethical procurement policy,
 - Anti-bribery / corruption policy, and
 - Whistle-blowing policy.

This policy was adopted on 25 October 2018 after being agreed by the partners. It is reviewed annually.

Modern Slavery Statement

This statement is made as part of Austin Dean Recruitment's commitment to eliminating the exploitation of people under the Modern Slavery Act 2015 (the Act). It summarises how Austin Dean Recruitment 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 Year. It was approved by the partners on 25 October 2018.

Max Bagas Director

1 Our Business

BECS UK is a limited company operating in the recruitment sector. We provide introduction services / supply temporary workers in the Healthcare sector. We trade as Austin Dean Recruitment.

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 the UK, Nationwide. The work-seekers / workers we supply live in various locations such as Manchester, London, Leeds, Bradford, Liverpool as we supply nationwide.

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)
- the General Medical Council (<https://www.gmc-uk.org/>)
- NHS Employers (<https://www.nhsemployers.org/>)
- Care Quality Commission (<https://www.cqc.org.uk/>)

Our Policies

Austin Dean Recruitment has a modern slavery policy

In addition, Austin Dean Recruitment has the following policies which incorporate ethical standards for our staff and our suppliers.

- Corporate Social Responsibility Policy
- Environmental Policy

- Equality and Diversity Policy
- Complaints Process Policy
- Whistleblowing Policy
- Health and Safety Policy

1.3 Policy development and review

Austin Dean Recruitment's policies are established by our directors, based on advice from HR professionals, industry best practice and legal advice, and in consultation with staff and stakeholders. We review our policies annually, or as needed to adapt to changes.

2 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 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.

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

3 Our Training

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

- Our leadership team receive detailed training in identifying and resolving concerns around modern slavery and human trafficking.
- Our recruiters, HR personnel, and/or staff involved in our procurement and supply chains] undertake training courses that include guidance around modern slavery and human trafficking, as well as other wider human rights issues.
- 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 encouraged to discuss any concerns that they have.
Training is refreshed annually