



## Modern Slavery, Human Trafficking Statement and Ethical Trading Policy

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### **Modern Slavery and Human Trafficking Statement**

#### **Introduction**

Central Employment Agency (North East) Ltd is committed to ensuring there is no modern slavery or human trafficking in our supply chain or in any part of our business. We are opposed to such worker exploitation in our direct operations, our indirect operations and our supply chain as a whole.

This statement is made in accordance with Section 54, Part 6 of the Modern Slavery Act 2015 and the Central Employment's Directors have overall responsibility for implementing and reviewing this statement, as well as monitoring the use and effectiveness of its content and proposals to eradicate modern slavery and human trafficking in Central supply chain.

#### **Business**

Central Employment is a recruitment service provider that operates in the temporary labour market in the UK. Central employs 39 internal employees that all work in our office in Newcastle upon Tyne. Central supply temporary and permanent labour, engaged as employees, to the industrial, construction and commercial sectors primarily. All staff are paid via PAYE and we do not use travel & subsistence payroll schemes.

*Central supplies temporary and permanent labour.*

The following is a non-exhaustive list of policies and documentation that assist Central with our approach to prevent modern slavery and human trafficking in our operations:

- **Whistleblowing policy** — our whistleblowing policy provides a mechanism for our employees to report concerns within Central and our clients.
- **Anti-slavery policy** – our anti-slavery policy demonstrates Central's commitment to preventing slavery and human trafficking and sets out the steps in place with the aim of ensuring there is no worker exploitation in Central's own business and supply chains. It educates our employees on the action to take if they believe or suspect that there has been a breach of the policy.
- **Equal opportunities policy** — our equal opportunities policy reflects our commitment to acting ethically and with integrity in all our business relationships.
- **Verification of identity and right to work** — we undertake Right to Work checks on our employees in line with the Home Office requirements.

Central is a Member of the REC (Recruitment & Employment Confederation) and is accredited with ISO 9001:2015 Quality management systems.

#### **Supply Chains**

Our business partners include, but are not limited to, our clients. We have detailed Terms of Business in place with our clients. Ultimately, we expect our business partners to promote the

same standards within their own supply chains. Central will never, knowingly, enter a business relationship with any organisation involved in modern slavery or human trafficking.

As a recruitment service provider, the key areas of our operation that could be affected by modern slavery and human trafficking are our directly hired employees. Forced labour, servitude and trafficking of labour are key areas of consideration for us.

Our employees and those we work with are encouraged to challenge any unethical, dishonest or unacceptable behaviour. All concerns raised will be treated seriously and will be investigated with

the relevant parties, without bias, with absolute discretion and appropriate action will be taken by the relevant party where required.

### **Due Diligence Process**

All Central's internal staff are trained on the due diligence procedures appropriate to high risk activity which could assist in identifying a case of modern slavery as detailed below:

- Central check the right to work documentation of employees to confirm legitimacy of their right to work in the UK. Relevant documents are inspected and photocopied and records are kept in line with the UK Home Office guidance. When appropriate, Central's internal employees are trained to advise Immigration Enforcement of any issues with right to work documentation.
- We operate a policy whereby if an employee wants to be paid through a bank account which is not held in their name, then we obtain written permission from both the employee and the account holder before making payment into the bank account. We also receive ID from both parties.
- Limited company contractors must be paid through a limited company bank account. We undertake due diligence on all limited company contractors via a prescribed checklist drafted specifically for the engagement of limited company contractors.
- On an ongoing basis, responsibility lies with the Managing Director to ensure that our processes, training and our understanding of the issues involved in modern slavery are kept up to date.

### **Next Steps**

We understand that the risk of modern slavery is ongoing and so, we must continue to improve our processes in the years ahead, with particular focus on:

- Update Central's training procedures on modern slavery including, but not limited to, how to identify the signs that a worker is potentially being exploited and what processes to follow if potential issues surrounding modern slavery are identified. We will repeat this training annually and update it as necessary.
- Include modern slavery training as part of the internal induction process.
- Obtaining our clients' and suppliers' anti-slavery policies and, where applicable, their modern slavery statements so we can begin to assess where we can work together to combat modern slavery in our supply chain.

Central Employment hold a Gangmasters & Labour Abuse Authority (GLAA). GLAA public register names or specifiers those authorised to act as a Gangmasters on behalf of the license holder. Licence No: CENT0001

This statement will be reviewed annually and published on our company website in line with Section 54(1) of the Modern Slavery Act 2015.

*This statement has been reviewed and approved by the Operations Director, who holds board-level responsibility for modern slavery compliance, and will be reviewed annually.*

## Human Rights and Ethical Trading Policy

Central Employment aims to consistently and safely deliver a recruitment service to the requirements of our customers and in line with relevant ethical trading and human rights legislation. We recognise that our ethical and social performance, and our reputation, is a key part of our overall success. Thus, there is a business and a moral case to ensure human rights and ethical trade is upheld in our operations.

As a responsible business, we are committed to upholding internationally recognised human rights as outlined in the Ethical Trading Initiative's (ETI) Base Code:

1. Employment is freely chosen.
2. Freedom of association and the right to collective bargaining are respected.
3. Working conditions are safe and hygienic.
4. Child labour shall not be used.
5. Living wages are paid.
6. Working hours are not excessive.
7. No discrimination is practiced.
8. Regular employment is provided.
9. No harsh or inhumane treatment is allowed.

The 9 clauses of the ETI Base Code reflect the most relevant conventions of the International Labour Organisation (ILO) with respect to labour practices. The ETI Base Code allows us to assess our commitment to human rights, good employment conditions, and ethical business practices.

Respecting human rights is of great importance to the company and to multiple stakeholders, both direct – including our employees, and our clients – and indirect – including certification bodies, non-governmental organisations (NGOs) and civil society organisations.

We do not condone any abuse of human rights in our supply chains and operations. We will take any allegations of disrespect for human rights seriously and will investigate appropriately, and seek to remedy effectively.

No bribery, corruption, blackmailing, or bullying is permitted and if reported to have occurred will be investigated appropriately to seek effective remedy.

The Managing Director of Central Employment has overall responsibility and will delegate individual responsibilities to ensure human rights and ethical trade standards are maintained.

**Signed:**



Mark Trett - Operations Director

**Date:**

1<sup>st</sup> July 2025

**Review Date:**

1st July 2026