

# Modern Slavery Statement covering the financial year ending 31<sup>st</sup> July 2020

## 1 Introduction

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

PureKat is fully committed to ethical working practices. As a company, we regard inhumane conditions such as slavery, worker exploitation, and human trafficking as completely unacceptable either within our own business or through our supply chains.

We understand our responsibilities and have a zero-tolerance approach to modern slavery. We recognise that modern slavery, which can take many forms, is a crime. We strive to act ethically and with integrity in all our business dealings and relationships, and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business, or in any of our supply chains.

## 2 Our Business

PureKat is a recruitment consultancy specialising in recruitment for temporary, fixed term contract and permanent roles. We provide introduction and recruitment process services, and supply temporary workers for businesses operating across a wide range of industry sectors.

PureKat is an independent business.

### 2.1 Who we work with

We provide work-seekers and temporary staff within the following sectors – Customer Service & Office Support; Sales & Marketing; IT & Scientific; Senior Management; Finance & Accounts; Engineering & Technical; Manufacturing & Logistics; Legal; Farming & Agriculture; Food & Drink and HR & Recruitment.

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.

The hiring companies that we work with are located mainly in Cambridgeshire, Essex, Norfolk and Suffolk. The work-seekers and workers we supply also live in these areas.

### 2.2 Our supply chains

Our supply chains are limited to those individuals and organisations who provide PureKat with the goods and services needed to operate our business, such as the sourcing of labour, materials, stationery, PPE, cleaning material, telecoms

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and IT equipment; and other materials, principally related to the provision of our services, and installation and maintenance.

While PureKat does not have a formal policy against which suppliers can be formally assessed and measured for compliance, we take great care to ensure that suppliers are dealing with their staff in an ethical way and we would certainly not deal with any supplier that fell short of PureKat's standards in this area.

We will continue to review this as part of our ongoing policy reviews and risk assessments.

### **2.3 Other relationships**

As part of our business, we also work with -

- Recruitment and Employment Confederation ([www.rec.uk.com](http://www.rec.uk.com))
  - Gangmasters & Labour Abuse Authority (<https://www.gla.gov.uk/>)

## **3 Our Policies in relation to Modern Slavery**

PureKat has a modern slavery policy published internally.

In addition, PureKat has the following policies that incorporate ethical standards for our staff and work-seekers:

- Anti-bribery
- Whistleblowing

### **3.1 Policy development and review**

PureKat's policies are established by our Managing Director and are based on industry best practice. We review our policies annually, or as needed to adapt to changes.

## **4 Our Processes for Managing Risk – Due Diligence**

In order to assess the risk of modern slavery, we use the following processes with our suppliers and clients:

- When engaging with clients, we attempt to understand 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-assessing a supplier or client. We conduct an assessment before entering into a commercial relationship with any business where there is the potential for risk.

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.

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Additionally, we have taken the following steps to minimise the possibility of any problems:

- In the event of any complaints about the businesses that supply us we ask the business to adhere to the standards expressed in our modern slavery policy and to define their modern slavery approach.
- We are happy to collaborate with our suppliers in order to improve standards and transparency across our supply chain.
- Only the Managing Director, who has undergone appropriate training for assessing modern slavery risks, amongst clients and the supply chain, is authorised to sign contracts and establish commercial relationships in any area where we have identified the potential for risk.
- In order to combat the risk of modern slavery and human trafficking we work with
  - Recruitment and Employment Confederation ([www.rec.uk.com](http://www.rec.uk.com))
  - Gangmasters & Labour Abuse Authority ([www.gla.gov.uk](http://www.gla.gov.uk))

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

We review our policies on a regular basis, or as required to adapt to changes. Typically, the agenda for such reviews will be selected from –

- Establish whether we have a duty to publish a Modern Slavery statement.
- Decide who will be responsible for overseeing compliance, and signing off the final statement.
- Assess the risks of modern slavery and human trafficking within our operations and, as far as possible, the supply chain of which we are part – do the appropriate due diligence.
- Review the current policies and practices in our business to assess if they are effective and the extent to which they will stand up to public scrutiny.
- Review the current training and processes available to staff and work-seekers on spotting the signs of modern slavery and human trafficking.

## 5 Our Performance

PureKat has completed the assessment and been awarded a Gangmasters & Labour Abuse Authority (GLAA) licence.

In 2020, we intend to complete the “Stronger Together” training and awareness programmes and obtain any relevant qualifications/licences for all our staff.

As part of monitoring the performance of PureKat, we will establish and track a set of general key performance indicators that are relevant to our business, e.g.:

- The level of training amongst staff
- The speed with which we investigate related complaints, should any arise, whether internally or from placed temporary workers
- The effectiveness of any whistle-blowing procedures
- The level of compliance and transparency established in the supply chain.

Based on potential risks we identify, we will also establish the following key performance indicators, which will be regularly assessed as part of our ongoing policy reviews and risk assessments.

- the percentage of clients who provide their own modern slavery statements
- the level of modern slavery training and awareness amongst our staff

We will discuss our indicators with suppliers/clients where appropriate and possible.

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## 6 Our Training

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

- Our management detailed training in identifying and resolving concerns around modern slavery and human trafficking.
- Our recruiters and staff involved in our procurement and supply chains will undertake relevant training courses (generally online or pre-recorded training, or documents/emails) that include guidance around modern slavery and human trafficking, as well as other wider human rights issues.
- All of our staff and work-seekers 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 as required but not less than annually.

## 7 Conclusion

During the period 1<sup>st</sup> August 2019 to 31<sup>st</sup> July 2020 PureKat Consultancy Ltd. continued to work to increase awareness of risks. We will continue to develop our commitment to combat modern slavery and will update our company policies and training materials as appropriate.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31<sup>st</sup> July 2020.

Signature

*K. Smith*

Katrina Smith, Managing Director

Date: 31.10.2019

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