

## Modern Slavery & Human Trafficking Policy Statement

---

### Document History:

Version:	Date:	Approved by	Revision
01	July 2016	A. McGinley	Approved In Use
02	July 2017	C. McGinley	Change of authorised signatory & group company information

This document is approved and authorised for application within McGinley Group only.

Signed



**Colm McGinley, CEO**

**CONTENTS**

**PURPOSE .....3**

**SCOPE .....3**

**1. INTRODUCTION .....3**

**2. ABOUT US .....3**

**3. SUPPLY CHAIN .....3**

**4. POLICIES .....4**

**5. DUE DILIGENCE .....4**

**6. TRAINING .....4**

## PURPOSE

This document sets out the policy with regards to the aim of preventing modern slavery within its business and supply chain. This policy's use of the term "modern slavery" has the meaning given in the Act.

## SCOPE

The responsibility to uphold this policy lies with all staff involved in the recruitment, management and supply of workers on a day to day basis.

### 1. Introduction

Modern Slavery is a criminal offence under the Modern Slavery Act 2015 (the Act) which can occur in various forms, such as servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

As a company, we have a zero tolerance to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or our supply chain. Our own processes around candidate engagement ensures our employees are alert to the signs of exploitation, in order that we may take the necessary action promptly and effectively should it be identified. Sectors affected include, but are not limited to, construction and healthcare.

This statement focuses specifically on compliance with the Modern Slavery Act 2015 and highlights the steps we take to ensure there is no slavery or human trafficking occurring within the organisation or its supply chains.

### 2. About Us

McGinley Group are a group of limited companies, operating as recruitment businesses and agencies specialising in the supply of temporary, contract and permanent labour to the construction, healthcare, education and aviation industries.

### 3. Supply Chain

At McGinley Group our supply chains includes, but is not limited to, sourcing candidates for clients. This may involve the introduction by external agencies to McGinley Group of candidates for supply to our clients. We expect our suppliers and potential suppliers to aim for high ethical standards and to operate in an ethical, legally-compliant and professional manner by adhering to our contract. We also expect our suppliers to promote similar standards in their own supply chain.

## 4. Policies

McGinley Group suppliers are expected to adhere to our contractual requirements, which include specific references to the Act, and should have in place a policy recognising, respecting and protecting the human rights of their employees, those of their suppliers and business partners and the communities affected by the suppliers' operations.

Employees should be free to choose to work for their employer and to leave the company upon reasonable notice.

All employees must be provided with a clear contract of employment, which complies with local legislation.

All employees must be treated in a fair and equal manner and with dignity and respect.

Any form of discrimination, victimisation or harassment on the grounds of marital or civil partnership status, sex (including gender reassignment), race (including colour, ethnic and national origin, nationality), disability, sexual orientation, having or not having dependants, religious belief or political opinion, age, trade union activity and offending background should be prohibited.

All applicable laws and industry standards on employee wages, benefits, working hours and minimum age should be adhered to, without any unauthorised deductions.

All slavery and human trafficking laws must be complied with including, but not limited to, the Act. Suppliers must ensure their business operations are free from slavery and human trafficking practices whether in the UK or elsewhere, both internally and within their supply chains and other external business relationships. We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

## 5. Due Diligence

McGinley Group ensure strict compliance checks are carried out for all candidates it supplies. We verify the identity of each worker and their right to work before supply commences.

As part of our commitment to identify and eradicate slavery and human trafficking, we undertake due diligence on our supply chain to ensure compliance with legislative obligations.

All McGinley Group employees have access to dedicated channels through which they may voice concerns, either through local reporting mechanisms and whistleblowing procedure. McGinley Group is committed to protecting employees when disclosing malpractice and will ensure that all disclosures made in good faith will be treated confidentially and without fear of retaliation.

## 6. Training

All staff within McGinley Group are expected to comply with all laws and act in accordance with local guidelines and regulations and act with integrity and honesty. Our policies and procedures ensure our staff have access to any additional information and support they may require with regard to human trafficking, forced labour, servitude and slavery. Further training is provided as required.