

MODERN SLAVERY STATEMENT

For period January to December 2019

INTRODUCTION

“The following statement has been prepared in accordance with section 54 of the Modern Slavery Act 2015. During 2019, GRI has worked hard to develop our processes, raise awareness and actively support our clients to achieve the aim of eradicating modern slavery and human trafficking. This has seen an increase in the number of potential incidences raised during the year through our reporting process. Whilst these have not been proven, we believe this is as a direct result of our improved processes and awareness raising.

It is our intention in 2020 to continue to work closely with our clients and suppliers, drawing on our experiences and increased understanding to work collaboratively and effectively to tackle a crime that should not be perpetrated in 2020.”



Andrew Preston
 CEO – Geometric Results International Limited

BACKGROUND

Geometric Results International Limited (GRI), provides neutral vendor services to high volume users of temporary and contract labour in the UK. GRI contracts with both hirers of temporary labour and temporary work agencies who supply the labour across a blue-chip client base in both the public and private sectors. In addition, GRI works with several clients supporting the supply of longer-term contractors and permanent recruitment in professional, administrative and engineering roles.

1. Organisation structure, it's business and supply chain

GRI Organisation

The GRI organisation is structured around providing high quality support to our clients. The majority of GRI employees work in our Operations functions: in account management teams; fulfilment support; implementation and; operational audit teams. A relatively large Technology function ensures the ongoing development of our e-tips® software. Supporting the operation are small functional teams of HR, Finance, Marketing and Business Development.

GRI UK is headquartered near Knutsford, North West England, in addition we have smaller satellite offices in the North East and South East and several remote and client-based employees.

Supply chain

GRI's supply chain is primarily made up of temporary labour agencies in the UK, with whom GRI contracts to provide labour directly to our clients who are also UK based. The Company works with numerous agencies, ranging from single office agencies to multinationals, with the top 200 agencies (by hours transacted) accounting for 70% of transacted hours. Individual workers within our supply chain originate in many countries, primarily within the EU but also from non-EU countries.

GRI's proprietary software, e-tips® gives us the capability to analyse our supply and to identify potential areas of increased risk.

Away from our operations, we have typical office supply, IT and other equipment, external advisory and ad hoc requirements.

2. Policies in relation to slavery and human trafficking

In 2019 we reviewed and refreshed all our policies associated with our approach to modern slavery including our Disciplinary, Grievance, Whistleblowing and Modern Slavery policies.

3. Due diligence processes

We have a standard set of terms which agency suppliers are required to comply with. These include a commitment to compliance with the provisions of the Modern Slavery Act and all relevant employment legislation in place to prevent exploitation of workers.

In 2019 we increased the size of our Operational Audit function which resulted in a year on year increase of 30% in completed supplier audits. We also took the opportunity to update the content of our modern slavery audit and this has been tested at the end of 2019, prior to full roll-out in 2020.

4. Parts of the GRI business and supply chains where there is a risk of slavery and human trafficking and the steps taken to assess and manage that risk

At GRI we have two distinct types of supply, our largest supply chain being through our agency partners supplying labour on behalf of our clients. In addition, we have a typical supply chain of goods and services supporting the running of our business.

Supply of goods and business services

We have mapped our goods and business services supply chain and used a risk mapping methodology to identify suppliers with potential higher risk. At this stage this exercise has been limited to our tier 1 suppliers. Our methodology includes consideration of spend and sphere of influence with our suppliers.

This risk mapping exercise of our goods and non-agency services has proved inconclusive and as a result we have taken the decision to adopt the GLAA’s guidance in relation to the identification of high-risk industry sectors who supply GRI.

Agency suppliers

We have used our proprietary software, e-tips® to analyse the supply of temporary labour through our agency supply chain. We have considered variables including role type and pay rate, industry sector and geographical working location.

Some headline figures in relation to our 2019 supply are shown in the tables below¹.

Total hours transacted	40,567,356
Spend under management	>£1bn
Number of agencies	3750
Number of workers	141,454
Number of countries of origin reported by agency workers	168

Top 10 countries of origin	
1	United Kingdom ²
2	Romania
3	Poland
4	Nigeria
5	India
6	Zimbabwe
7	Italy
8	Portugal
9	Lithuania
10	Hungary

¹Source: e-tips®

²Agency workers from the United Kingdom make up 64% of our agency supply.

It is our intention in 2020 to focus on some key risk areas identified in our agency supply chain mapping and to work with clients and suppliers to ensure that we do everything we can to mitigate these risks and prevent slavery, trafficking and exploitation from happening in our supply chain.

Summary of steps taken to assess and manage risk

- ✓ In 2018, GRI took the decision to become founding members of the Slave Free Alliance in order to benefit from their expert support. Our commitment in 2019 was to work with them to identify a programme of improvements to support our business in tackling the risks of slavery and exploitation. We have worked with Slave Free Alliance throughout the year as we progress this journey and it is our intention to continue doing so.
- ✓ We reviewed and updated our Disciplinary, Grievance and Whistleblowing policies to align them to our Modern Slavery Policy.
- ✓ We undertook a supply chain mapping exercise of both our agency supply and our supply of goods and services. We also referenced external data, advice and best practice to identify potential areas of higher risk.
- ✓ We have increased our audit capacity by 30% and broadened the content in relation to modern slavery.
- ✓ We introduced a new Corporate Induction for all new joiners which includes a modern slavery briefing. All new joiners since January 2019 have attended this session. This is in addition to our e-learning modern slavery induction training which has been completed by 95% of GRI's current workforce.
- ✓ We have worked with account teams to raise awareness and to better enable them to support their client contacts with their modern slavery response.
- ✓ We shared a briefing document with all staff to act as a refresher in relation to modern slavery.

5. Effectiveness in ensuring that slavery and human trafficking is not taking place in our business or supply chain

We saw an increase in concerns raised via our account teams in 2019. These have been investigated with the support of Slave Free Alliance, although not confirmed as cases of modern slavery we believe that this demonstrates a heightened knowledge and awareness both of potential risk factors and of our reporting requirements and process. We are pleased that individuals feel comfortable to raise these concerns.

We introduced a post-investigation review stage to our process in 2019, through which we have been able to identify improvements and make recommendations to clients and suppliers in support of their modern slavery processes.

Improvements identified through the post-investigation review process included an update and refresh of our client specific Modern Slavery Toolkit and further communication of our Response Plan to employees.

Continuous Improvement

We are committed to continuously working to strengthen our approach to tackling the threat of modern slavery and human trafficking in our business and supply chain. Our journey continues in 2020 and our priorities for this period are as follows:

- 90% supplier agency audits completed
- 100% of new joiners to GRI complete modern slavery induction training
- 90% of GRI account management teams attend refresher scenario-based training
- Initiatives to support clients within identified high risk industry sectors will include site assessments within high risk sectors
- Increased agency engagement to support our suppliers in identifying and mitigating risk

6. Training on modern slavery and human trafficking available to GRI staff

We require all staff to complete e-learning training on modern slavery and human trafficking. This is now included as part of our induction programme for new joiners to GRI.

In addition, we have introduced a modern slavery face-to-face briefing to our Corporate Induction.

In 2020 we are planning to run scenario-based refresher training for GRI employees in our account management teams, to support them in assessing risk and giving them the tools to effectively follow up in the event of incidents being identified.

This statement is for the financial year January – December 2019, published February 2020.