

# MODERN SLAVERY STATEMENT

For period January to December 2020

## INTRODUCTION

*“The following statement has been prepared in accordance with section 54 of the Modern Slavery Act 2015. During 2020, GRI has, along with its clients and suppliers, seen challenges arise from the impact of COVID-19, with many of our standard operating processes being affected. This has seen us adapt our approach to dealing with Modern Slavery across the business, while actively ensuring we continue to actively support our clients to achieve the aim of eradicating modern slavery and human trafficking.*

*It is our intention in 2021 to continue to work closely with our clients and suppliers, to continue to ensure our approaches to tackling Modern Slavery are fit for purpose and provide the right level of assurances and protection for all.”*



**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 team, providing daily support to our clients and supplying agencies. A relatively large Technology function ensures the ongoing development of our e-tips® software. Supporting the operation are small functional teams of HR, Finance, Corporate Services, 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 just over 70% of all 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 recruitment operations, we have a typical office supply chain, including IT and other equipment, stationery & office supplies, service

providers for waste management, facilities and our external advisory providers.

## 2. Policies in relation to slavery and human trafficking

In 2020 we completed an annual review of all of our policies associated with our approach to modern slavery. We have in place a specific Modern Slavery Policy, complemented by a Response Plan that provides practical guidance on dealing with modern slavery concerns to our employees. These documents were created to set out corporate expectations on the management of modern slavery risk within our supply chain, and to ensure GRI have the necessary procedures in place to deal with the increased modern slavery risk that is inherently associated with work within the recruitment sector. This is specifically so for the industries of food production and distribution, and waste management, sectors in which GRI have a number of clients. These are further supported by our Disciplinary, Grievance & Whistleblowing policies.

Our Modern Slavery Response Plan was created in partnership with the Slave Free Alliance who were able to offer their expertise in this area to provide additional support and guidance.

## 3. Due diligence process

We have a standard set of terms which agency suppliers are required to comply with. These outline the minimum set of expectations that GRI have in regard to our supply chain's commitment to both compliance with the provisions of the Modern Slavery Act, and all relevant employment legislation currently in place to prevent exploitation of workers. These include requirements for suppliers to:

- Have in place appropriate policies of their own regarding Modern Slavery.
- Conduct their own internal due diligence process on their supply chain.
- Ensure no staff have a connection to any prior or current modern slavery investigations.

In 2020 we completed the roll-out of our Modern Slavery survey as part of our audit process with our agency suppliers. To date we have had over 650 responses, which has provided us with a better understanding as to the level of engagement with

anti-slavery activities within our supplier base. Some key insights here include:

- 12% of respondents meet the threshold for a legally required Slavery Statement and provided GRI with a copy to review.
- 85% of respondents have in place a Modern Slavery policy, which was then shared with GRI as part of the survey.
- 79% of respondents have a MS training programme in place for their internal staff.
- 98% of suppliers have internal controls for ensuring NMW compliance.

From this data, GRI have been able to:

- Gain assurance on the compliance of legally mandated supplier Slavery Statements and provide some guidance to suppliers where Statements fall short of expected content.
- Ascertain that not all suppliers are currently complying with the contractual requirements for suitable policy documents to be in place, and as such have created audit actions to be followed up in the next audit cycle.
- Identify an area of improvement for suppliers in relation to Modern Slavery training, and we will look at options to support suppliers on this during 2021.

GRI have also recently become a sponsor of the Responsible Recruitment Toolkit. This decision comes after discussions with RRT in 2020 about the benefits this provides to labour providers, and the many tools available for improving recruitment processes. GRI is now able to offer full free access to the toolkit to all current suppliers, allowing them to take ownership of their recruitment processes, and to ensure best practice across their full recruitment cycle.

## 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.

**Agency Suppliers**

Our largest distinct supply chain area is the recruitment agencies we engage with on behalf of our clients. It is this supply chain that holds the largest modern slavery risk for GRI, due to the volume of temporary workers used across a variety of sectors and job categories. We are able to use our proprietary software, e-tips®, to analyse this supply of temporary labour through our agency supply chain and can consider variables including role type and pay rate, industry sector and geographical working location.

Some headline figures in relation to our 2020 supply are shown in the tables below<sup>1</sup>.

|   |            |
|---|------------|
| <b>Total hours transacted</b>                                   | 34,053,515 |
| <b>Spend under management</b>                                   | >£1bn      |
| <b>Number of agencies</b>                                       | 1816       |
| <b>Number of workers</b>  | 121,891    |
| <b>Number of countries of origin reported by agency workers</b> | 149        |

| <b>Top 10 countries of origin</b> |                             |
|-----------------------------------|-----------------------------|
| <b>1.</b>                         | United Kingdom <sup>2</sup> |
| <b>2.</b>                         | Romania                     |
| <b>3.</b>                         | Nigeria                     |
| <b>4.</b>                         | India                       |
| <b>5.</b>                         | Poland                      |
| <b>6.</b>                         | Italy                       |
| <b>7.</b>                         | Portugal                    |
| <b>8.</b>                         | Zimbabwe                    |
| <b>9.</b>                         | Spain                       |
| <b>10.</b>                        | Ghana                       |

<sup>1</sup>Source: e-tips®

<sup>2</sup>Agency workers from the United Kingdom make up 61% of our agency supply.

There have been some minor changes to the breakdown of the country of origin for the agency workforce. Slightly less workers than in 2019 came

from the UK, down 3%. There has also been a reduction in the number of European countries in the top 10, suggesting that Brexit has impacted the workforce somewhat. GRI intend to continue to monitor this across 2021 to see if there is any impact with regards to modern slavery concerns. If any increased risk is determined, GRI will consider implementing necessary controls to mitigate this as appropriate.

**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 has shown us that this area of our supply chain carries low levels of risk associated to Modern Slavery. We will continue to review our suppliers and take advice from external sources on the way in which we engage with these suppliers to ensure modern slavery risk is minimised as much as possible.

**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. 2020 saw us enter our third membership year. We have worked with Slave Free Alliance throughout the year, attending many of their informative webinars, allowing our corporate teams to remain up to date on legislative requirements and best practices.
- ✓ We reviewed and updated our Disciplinary, Grievance and Whistleblowing policies to align them to our Modern Slavery Policy.
- ✓ We have successfully introduced an in-depth process review around Modern Slavery as part of our agency audit process. This was requested from every supplier that underwent an audit with GRI in 2020.
- ✓ Our corporate induction programme has been formalised to include a review of all relevant policies, ensuring all new starters are exposed

to the ethos of GRI and our working practices in relation to Modern Slavery within 1 month of joining the team.

- ✓ We have worked with account teams to raise awareness and to better enable them to support their client contacts with their modern slavery response.
- ✓ All operational staff completed a training course on the key signs of Modern Slavery within the recruitment process in December 2020. This was provided by the training team within Slave Free Alliance.

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

We saw a small decrease in concerns raised via our account teams in 2020 against 2019. These have been investigated thoroughly internally, and where appropriate GRI have cooperated with police investigations. There were no confirmed cases of modern slavery affecting individuals employed within the GRI supply chain, and we aim to encourage more of our suppliers to report concerns they have within their businesses to us, so that we can work in partnership to reduce risk across the board.

Some of the decrease in reporting we believe comes from the impact of COVID-19. Many of our agency suppliers ceased face-to-face engagement with workers, and so the key opportunities for spotting the signs of slavery may have been reduced. This is a challenge faced across the recruitment industry, and GRI will be working with the agency suppliers to increase awareness and understanding of the ‘red flags’ of slavery, to mitigate some of these concerns.

In 2019, we introduced a post-investigation review stage to our process, where all instances of suspected modern slavery are reviewed and assigned one or more causality categories to understand where the risk could have been mitigated more effectively. These include as examples:

- Supplier Vetting Failure
- GRI Process Failure
- Reporting Issue

This categorisation has allowed us to identify trends and causes more effectively and has also given us clearer recommendations to make to clients and suppliers in support of their modern slavery processes.

In 2020, GRI have also moved the responsibility for managing all Modern Slavery activity to the newly created Corporate Services department. They sit as a connection between all other areas of the GRI business, and as such are best placed to liaise with all employees on these matters.

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

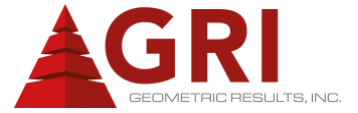
In 2020, scenario-based refresher training was completed by all GRI employees in our account management teams and across our corporate services teams, to support them in assessing risk and giving them the tools to effectively follow up in the event of incidents being identified. This training was provided by the Slave Free Alliance training team, who were able to provide valuable learnings for the entire team.

**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 2021 and our priorities for this period are as follows:

- Audit at least 75% of the agencies currently engaged with GRI.
- Ensure all supplier agency audits completed include a review of Modern Slavery processes
- Ensure that 100% of new joiners to GRI have read and understood the company policies relating to slavery and exploitation.
- 90% of GRI account management teams to attend refresher scenario-based training.
- Review the content of the induction training to ensure it remains current and relevant.
- Increased agency engagement to support our suppliers in identifying and mitigating risk.
- Focus on introducing more suppliers to the Responsible Recruitment Toolkit, while also

May 2021



beginning to increase engagement with the tools available.

*This statement is for the financial year January – December 2020, published May 2021.*