

# Scattergoods Agency Ltd

## Modern Slavery Statement

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

This statement is published in accordance with section 54 of the Act, and relates to the financial year March 2018 to February 2019. It was approved by the Board of Directors on 9<sup>th</sup> March, 2018.

**Andrew Vicos**  
Managing Director

### 1. Our Business

Scattergoods Agency Limited is a Limited Company operating in the recruitment sector. We provide introduction services and supply temporary workers in the Catering & Hospitality sectors.

Scattergoods Agency Limited is an independent business.

#### 1.1 Who we work with

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. We do not supply work-seekers to hiring companies through any intermediaries.

The hiring companies that we work with are located in Surrey, Hampshire, Berkshire & West Sussex areas. The work-seekers and workers we supply live in Surrey, Hampshire, Berkshire & West Sussex areas

#### 1.2 Other relationships

As part of our business, we also work with the following organisations:

- The Recruitment and Employment Confederation ([www.rec.uk.com](http://www.rec.uk.com))

### 2. Our Policies

Scattergoods Agency Limited has a Modern Slavery Policy available at [www.scattergoods.co.uk](http://www.scattergoods.co.uk)

In addition, Scattergoods Agency Limited has the following policies, which incorporate ethical standards for our staff

- Equal Opportunities Policy
- Privacy Policy
- Health & Safety Policy

#### 2.1 Policy Development & Review

Scattergoods Agency Limited's policies are established by our Directors, based on advice from HR professionals, industry best practice and legal advice. We review our policies on a regular basis, or as needed to adapt to changes.

### 3. Our Processes for Managing Risk

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

- When engaging with suppliers, we ask for evidence of their processes and policies, including commitments around modern slavery, human trafficking, forced labour, human rights, and whistle blowing.
- We conduct audits before entering into a commercial relationship with any business where there is the potential for risk. These audited businesses form the basis of our preferred supplier list.
- We review the potential for risk at regular intervals, including the possibility of re-auditing a supplier or conducting spot checks.

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.

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

- We reserve the right to conduct spot-checks of the businesses who supply us, in order to investigate any complaints.
- We require the businesses we work with to address modern slavery concerns in their policies
- We collaborate with our suppliers in order to improve standards and transparency across our supply chain.
- Only senior members of staff who have undergone appropriate training for assessing modern slavery risks in the supply chain are authorised to sign contracts and establish commercial relationships in any area where we have identified the potential for risk.
- We ensure that all of our suppliers are members of appropriate industry bodies and working groups.
- We work with appropriate organisations in order to combat the risk of modern slavery and human trafficking.

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

#### **4. Our Performance**

As part of monitoring the performance of Scattergoods Agency Limited, we track general key performance indicators.

Based on the potential risks we have identified, we have also established the following key performance indicators, which are regularly assessed by our Board of Directors:

- the percentage of suppliers who sign up to an appropriate code / provide their own modern slavery statements
- the effectiveness of enforcement against suppliers who breach policies
- the amount of time spent on audits, re-audits, spot checks, and related due diligence
- the level of modern slavery training and awareness amongst our staff

We benchmark our indicators against industry best practice in order to ensure that we do not put undue pressure on our suppliers that might increase the potential for risk.

#### **5. Our Training**

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

- Our leadership team receive detailed training in identifying and resolving concerns around modern slavery and human trafficking.
- Our recruiters, HR personnel, and/or staff involved in our procurement and supply chains undertake training courses that include guidance around modern slavery and human trafficking, as well as other wider human rights issues.

- All of our staff 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.