

## Introduction

1. We are Venn Group Ltd of Norman House, 105-109 Strand, London, WCR2 0AA. References to “we”, “us” and “our” are to Venn Group Ltd.

2. This Slavery and Human Trafficking Statement is made for the financial year 2018/2019, in accordance with section 54, Part 6 of the Modern Slavery Act 2015 (“MSA”).

3. Modern slavery is a violation of fundamental human rights and encompasses slavery, servitude, forced and compulsory labour and human trafficking. It is estimated there are over 21 million victims, including children, of forced labour globally.

4. We have a zero tolerance approach to modern slavery and this statement sets out the steps our organisation has taken to minimise the risk of slavery and human trafficking taking place in any part of our business or in any part of our supply chain.

5. In summary, we have reviewed and modified our policies, processes and procedures to ensure they address the risks posed by modern slavery, including:

- induction training for new employees
- training for existing employees
- reporting processes
- whistleblowing policy
- amending our Employee Manual
- inserting modern slavery provisions into contracts with clients
- assessing steps taken by existing and potential suppliers to combat modern slavery
- compiling a list of approved suppliers verified by us as having taken appropriate steps to combat modern slavery within their businesses and supply chain
- amending our terms of business with those in our supply chain requiring them to comply with their obligations under the MSA and all relevant legislation

6. The person in our organisation with overall responsibility for ensuring all necessary steps are taken to combat slavery and human trafficking is Philip Hanna, Managing Director. All enquiries or comments about this statement should initially be directed to Kirsty MacDougall, Head of HR [kmacdougall@venngroup.com](mailto:kmacdougall@venngroup.com)

## Our business structure

7. We operate within the recruitment sector in the UK and we act as an employment agency and employment business. We provide recruitment services to our clients, namely introducing and supplying personnel to clients in various sectors including Finance, Engineering and Infrastructure, Government & Not for Profit, Health & Life Sciences, Housing, Legal and Technology.

8. We have over 375 employees and have a global annual turnover of £130 million.

9. Our suppliers and contractors are predominantly UK based.

10. Our supply chains consist of:

- suppliers of personnel with whom we work to delivery services to clients;
- suppliers of goods to enable us to provide recruitment services to our clients, such as office equipment, food and drink, stationery
- suppliers of services to enable us to provide recruitment services to our clients, such as accounting, auditing, IT, insurance, cleaning, catering, facilities management, maintenance and transport

## Our policies on slavery and human trafficking

11. We have an Anti-Slavery and Anti-Human Trafficking Policy ("Policy") which can be accessed through our website. This Policy sets out our commitment to combatting modern slavery and human trafficking. Our Policy also details the steps which we are taking to minimise the risk of modern slavery and human trafficking taking place in our supply chain or in any part of our business.

### Training

12. We provide all our new employees with induction training which includes training on the risks posed by modern slavery and the processes and procedures designed to combat it within our organisation and within our supply chain.

13. We provide all our existing employees with training on the risks posed by modern slavery and the processes and procedures designed to combat it within our organisation and within our supply chain.

14. Our training for employees who may come into direct contact with potential victims of modern slavery, emphasises the need for extra vigilance when verifying documents, undertaking additional checks, keeping copies of all official documents and emphasises the importance of following up and reporting any inconsistencies or suspicions to management.

### Due diligence processes for slavery and human trafficking

15. As part of our zero tolerance approach to slavery and human trafficking and as part of our initiative to identify and mitigate risk, we have specific systems and processes in place which are focussed on recognising and carefully assessing potential risk areas in our supply chain and within our organisation.

16. We have identified some goods and services supplied to us which are at a higher risk of modern slavery, particularly in our cleaning services, food purchasing arrangements and property maintenance.

17. We also recognise there is a higher risk of modern slavery in supply chains involving overseas suppliers of goods and services.

18. We understand the perpetrators of modern slavery may go to great efforts to conceal their activities and victims of modern slavery may be vulnerable and reluctant to come forward.

19. We further recognise some of our employees may come into direct contact with candidates who are potential victims of modern slavery and we have ensured they in particular are aware of the need to be vigilant and to comply strictly with all policies, process and procedures to minimise the risk of modern slavery within our business or supply chain.

20. Recognising these risks allows us to target our resources effectively to combat the risk of modern slavery where it is highest.

21. As a business within the recruitment sector, we already have a number of specific processes and systems in place which are either required by law or recommended as best practice, many of which also assist in identifying and minimising the risk of modern slavery within our organisation and supply chains. These include:

- undertaking ID checks
- obtaining references
- checking right to work in the UK
- working only with suppliers approved or verified by the company

22. We have reviewed and modified our existing internal processes to ensure compliance and to minimise the risk of modern slavery taking place within our organisation and supply chains.

23. All our employees are aware of our Whistleblowing Policy which can be found in our intranet and the processes in place. Employees are encouraged to report any concerns or suspicions they have that slavery or human trafficking is taking place within our organisation or supply chain. Employees are aware they will not suffer any detriment as a result of disclosing a concern relating to slavery or human trafficking in good faith.

24. We have compiled a list of approved suppliers who have been verified by us as having published Slavery and Human Trafficking Statements and whom we are satisfied have taken reasonable steps to minimise the risk of slavery or human trafficking taking place within their organisations or within their supply chains.

25. We have provided our internal employees with a comprehensive internal Anti-Slavery and Anti-Human Trafficking policy, which deals with training, processes and reporting, and using only suppliers that have been verified or approved by the organisation.

26. All suspicions brought to our attention that an occurrence of modern slavery is taking place within our business or within our supply chain, or in the course of our day to day dealings with candidates will be reported promptly to the police and/or the Gangmasters' Licensing Authority.

27. Our internal policy and training has emphasised our expectation that staff comply with all relevant processes as notified and updated from time to time.

28. All new suppliers are engaged under written terms requiring them to comply with all laws relevant to their businesses.

### Further steps

29. To ensure our practices are as effective as possible, we regularly review our anti-slavery strategies.

### Key performance indicators

30. We will monitor the indicators below to assess the effectiveness of the steps we take to combat modern slavery

- completion of training
- reports of occurrence or potential occurrences of modern slavery
- percentage of suppliers on approved supplier list
- percentage of suppliers with published modern slavery statements

31. This statement has been approved by Philip Hanna, Managing Director, and constitutes our organisation's Slavery and Human Trafficking Statement pursuant to Section 54 of the Modern Slavery Act 2015, for the financial year ending 30th June 2019.

Signed for and on behalf of  
Venn Group Ltd



Philip Hanna  
Managing Director

Date: 27/6/18