

Modern Slavery Policy

Avatar Recruitment Consultancy Ltd

1. Avatar Recruitment Consultancy Ltd is committed to eliminating modern slavery, human trafficking, forced labour, and similar human rights abuses.
2. Avatar Recruitment Consultancy Ltd is committed to ensuring that its staff and any workers it supplies (directly or indirectly) are not subject to behaviour or threats that may amount to modern slavery, human trafficking, forced labour, and similar human rights abuses.
3. Avatar Recruitment Consultancy Ltd provides appropriate training and awareness information for all of its staff.
In particular:
 - 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.
4. Any staff, workers or other parties are strongly encouraged to report any concerns or suspicions that they might have to Christine Dyckes, Director of Avatar Recruitment Consultancy Ltd.
5. Reports surrounding these issues are taken extremely seriously by our director who is committed to ensuring that all investigations shall be prompt and effective. If our investigations reveal any issues, we are committed to taking appropriate action, including but not limited to:
 - Removing that organisation from our preferred supplier list,
 - Passing details to appropriate law enforcement bodies.
6. We regularly monitor our risks in this area through the use of relevant key performance indicators, including:
 - The percentage of suppliers who sign up to an appropriate code / provide their own modern slavery statements,
 - The percentage of workers/candidates supplied from audited businesses / our preferred supplier list,
 - The effectiveness of enforcement against suppliers who breach policies,
 - The amount of time spent on audits, re-audits, spot checks, and related due diligence, and
 - The level of modern slavery training and awareness amongst our staff.
7. As part of our efforts in this area, we publish a modern slavery statement on an annual basis.

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Avatar Recruitment - Bloxham Mill Business Centre, Barford Road, Bloxham, Oxfordshire OX15 4FF

Registered in England & Wales No.7199606. Registered Office: The Zinc Building, Ventura Park, Broadshires Way, Carterton,

Oxon. OX18 1AD

8. We would also recommend reading this in conjunction with our other policies, including our:

- Corporate social responsibility policy,
- Ethical procurement policy,
- Anti-bribery / corruption policy, and
- Whistle-blowing policy.

This policy was adopted on 1st April 2017 after being agreed by the Director. It is reviewed annually.

Modern Slavery Statement

Avatar Recruitment Consultancy Ltd

This statement is made as part of Avatar Recruitment Consultancy Ltd commitment to eliminating the exploitation of people under the Modern Slavery Act 2015 (the Act). It summarises how Avatar Recruitment Consultancy Ltd 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 April 2017 to April 2018. It was approved by the Director on 1st April 2017.

Christine Dyckes

Director

➤ **Our Business**

Avatar Recruitment Consultancy is a limited company, operating in the recruitment sector. We provide introduction services / supply temporary workers to the Commerce & Industry sectors.

Avatar Recruitment Consultancy is an independent business.

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. Some of these work-seekers operate through their own limited companies. We do not supply work-seekers to hiring companies through any intermediaries. / Some of our work-seekers are supplied via other businesses, who facilitate providing them to the eventual hiring company.

The hiring companies that we work with are located in the UK. The work-seekers / workers we supply live in the UK, usually local to the client.

➤ **Other relationships**

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

- the Recruitment and Employment Confederation (www.rec.uk.com) and the Institute of Recruitment Professionals (www.rec-irp.uk.com)

➤ **Our Policies**

Avatar Recruitment Consultancy has a modern slavery policy.

In addition, Avatar Recruitment Consultancy has the following policies which incorporate ethical standards for our staff.

➤ **Policy development and review**

Avatar Recruitment Consultancy policies are established by its Director Christine Dyckes based on advice from HR professionals, industry best practice and legal advice, and in consultation with the REC. We review our policies annually or as needed to adapt to changes.

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➤ **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.

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 abide by our code of supplier conduct. We collaborate with our suppliers in order to improve standards and transparency across our supply chain.

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

➤ **Our Performance**

As part of monitoring the performance of Avatar Recruitment Consultancy, we track the following 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 Director.

- 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 level of modern slavery training and awareness amongst our staff

We benchmark our indicators against industry best-practice

Our Training

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

- 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. Training is refreshed annually.