Modern Slavery and Human Trafficking Policy

Issued by: Clarence Recruitment ("the Company")
Date: August 2026
Review Cycle: Annual, or sooner where required

1. Purpose

Clarence Recruitment is committed to preventing modern slavery, human trafficking, forced labour and other forms of exploitation within our organisation and throughout our business relationships.

As a recruitment business, we recognise that the nature of our work means we have a particular responsibility to protect candidates and workers from exploitation and to ensure that the organisations and individuals we work with operate responsibly.

This policy sets out Clarence Recruitment's approach to identifying, preventing and addressing the risks of modern slavery and human trafficking.

We are committed to complying with the **Modern Slavery Act 2015** and other applicable legislation and to promoting high standards of ethical and responsible recruitment.

2. Our Commitment

Clarence Recruitment has a zero-tolerance approach to modern slavery and human trafficking.

We will not knowingly:

- employ or engage individuals who are subject to forced labour or exploitation;
- facilitate the exploitation or trafficking of workers;
- work with organisations that knowingly engage in modern slavery or human trafficking;
- charge workers inappropriate recruitment or placement fees; or
- support or facilitate practices that restrict an individual's freedom to work or leave employment.

We are committed to ensuring that people who work for or through Clarence Recruitment are treated fairly, lawfully and with dignity and respect.

3. What is Modern Slavery?

Modern slavery is an umbrella term covering a range of exploitative practices. It includes:

- slavery;
- servitude;
- forced or compulsory labour;
- human trafficking; and
- other forms of severe exploitation.

Modern slavery may involve threats, coercion, deception, abuse of power or other means used to control or exploit an individual.

Individuals may be particularly vulnerable where they are dependent on an employer or recruiter, have limited knowledge of their rights, are isolated from support networks or are subject to financial or immigration-related pressures.

4. Recruitment and Placement Practices

As an education recruitment agency, Clarence Recruitment recognises the importance of responsible recruitment practices.

We will:

- carry out appropriate identity and right-to-work checks;
- ensure candidates receive appropriate information about the role and relevant terms and conditions;
- not knowingly facilitate the payment of unlawful or inappropriate recruitment fees by workers;
- ensure that workers are paid in accordance with their contractual arrangements and applicable legislation;
- maintain appropriate records relating to candidates and placements;
- investigate concerns raised by candidates or workers about their treatment;
- work with clients to address concerns relating to worker welfare; and
- take appropriate action where we identify evidence of exploitation or abusive practices.

We will not knowingly place a candidate or worker with an organisation where there is credible evidence of modern slavery or serious exploitation without taking appropriate action.

5. Due Diligence and Business Relationships

Clarence Recruitment will take proportionate steps to assess modern slavery risks within our business relationships.

Depending on the nature and level of risk, this may include:

- considering the reputation and nature of a prospective client or supplier;
- reviewing relevant policies or statements where appropriate;
- ensuring contractual arrangements support lawful and ethical working practices;
- monitoring concerns raised by candidates, workers or other stakeholders;
- reviewing suppliers that provide services to Clarence Recruitment; and
- taking further action where concerns or risks are identified.

We expect our clients, suppliers and business partners to comply with applicable employment, human rights and modern slavery legislation.

Where appropriate, Clarence Recruitment may ask relevant suppliers or business partners to confirm their commitment to preventing modern slavery.

6. Recognising the Signs of Modern Slavery

Modern slavery can be difficult to identify. Staff should remain alert to potential indicators, including where an individual:

- appears frightened, controlled or reluctant to speak freely;
- appears to be under the control of another person;
- is unable to freely leave their employment or accommodation;
- has limited or no control over their own identity documents;
- appears to be working excessive hours or under unreasonable conditions;
- receives little or no pay, or appears unable to access their wages;
- has unexplained deductions from their pay;
- is living in accommodation provided by an employer under concerning conditions;
- appears isolated from colleagues, friends or support networks;
- is accompanied by someone who appears to speak on their behalf or control their interactions;
- gives inconsistent or concerning information about their employment or living arrangements; or
- shows signs of physical, emotional or psychological distress.

No single indicator necessarily means that modern slavery is taking place. Staff should use their judgement and report concerns rather than attempting to investigate the situation themselves.

7. Reporting Concerns

Anyone working for or with Clarence Recruitment who has a concern about potential modern slavery, human trafficking, forced labour or exploitation is encouraged to report it immediately.

Concerns should be reported to:

Mia Jones
Head of Business Services & Governance
Email: mia@clarencerecruitment.co.uk

Where a concern relates to Mia Jones, it should be reported directly to a Director of Clarence Recruitment.

Concerns may be raised by employees, candidates, temporary workers, clients, suppliers or any other individual who has information relevant to a potential issue.

All concerns will be taken seriously and assessed promptly.

Individuals who raise concerns in good faith will not be subjected to victimisation or detrimental treatment as a result of doing so.

8. Responding to Concerns

Where a concern is raised, Clarence Recruitment will assess the circumstances and determine the appropriate response.

Depending on the nature and seriousness of the concern, this may include:

- speaking confidentially with the individual who raised the concern;

- taking steps to protect the individual from further harm;
- reviewing relevant records and information;
- raising the matter with the relevant client or supplier;
- suspending or ending a business relationship where appropriate;
- seeking advice from an appropriate specialist organisation;
- reporting the matter to the relevant authorities or law enforcement agencies; and

taking any other action necessary to protect individuals and comply with our legal obligations.

We will avoid taking action that could place an individual at further risk.

Where there is an immediate risk of serious harm or a suspected crime, the appropriate emergency or law enforcement authorities will be contacted.

9. Training and Awareness

Clarence Recruitment will provide appropriate information and training to employees to help them:

- understand modern slavery and human trafficking;
- recognise potential indicators of exploitation;
- understand the risks associated with recruitment and temporary work;
- know how to report concerns; and
- understand their responsibilities under this policy.

Training and awareness will be reviewed periodically to ensure that it remains appropriate to the Company's activities and risk profile.

10. Suppliers and Third Parties

Clarence Recruitment expects suppliers and third parties working on our behalf to operate responsibly and comply with applicable legislation.

Where we identify a significant risk or concern relating to modern slavery within a supplier or business relationship, we may:

- request further information or evidence of appropriate controls;
- require corrective action;
- increase monitoring or due diligence;
- suspend the relationship; or
- terminate the relationship where appropriate.

Serious concerns may also be reported to the relevant authorities.

11. Monitoring and Risk Management

Clarence Recruitment will periodically consider the risks of modern slavery within its organisation, recruitment activities and relevant business relationships.

Our monitoring may include consideration of:

- concerns raised by candidates, workers or employees;
- recruitment and placement practices;

- supplier and client relationships;
- relevant training and awareness activity;
- compliance with right-to-work and identity-checking requirements; and
- any incidents, investigations or regulatory developments relevant to modern slavery.

Where risks are identified, we will take proportionate steps to reduce or address them.

12. Record Keeping

Clarence Recruitment will maintain appropriate records relating to:

- modern slavery concerns and reports;
- investigations and actions taken;
- relevant training and awareness activities;
- supplier or client due diligence where appropriate; and
- any referrals or reports made to external authorities.

Records will be maintained securely and in accordance with the Company's **Data Protection Policy** and applicable data protection legislation.

13. Annual Modern Slavery Statement

Clarence Recruitment will comply with any statutory requirements that apply to the publication of a Modern Slavery Statement.

Where the Company is not legally required to publish an annual statement, it may nevertheless choose to publish a voluntary statement where this is considered appropriate to demonstrate its commitment to preventing modern slavery and human trafficking.

14. Related Policies

This policy should be read alongside the Company's other relevant policies and procedures, including:

- **Whistleblowing Policy**
- **Equality, Diversity and Inclusion Policy**
- **Data Protection Policy**
- **Complaints Policy and Procedure**
- **Recruitment and Selection Procedures**
- **DBS and Recruitment of Ex-Offenders Policy**
- **Employee Handbook**

15. Responsibilities

All Employees and Workers

Everyone working for or on behalf of Clarence Recruitment is expected to:

comply with this policy;

- remain alert to potential signs of exploitation;

- treat candidates, workers and colleagues with dignity and respect;
- report concerns promptly; and
- cooperate with any appropriate investigation.

Managers

Managers are responsible for:

- promoting awareness of modern slavery risks;
- responding appropriately to concerns;
- ensuring recruitment and placement processes are followed;
- supporting individuals who raise concerns; and
- escalating serious concerns to senior management.

Senior Leadership

The Company's senior leadership team is responsible for:

- ensuring appropriate procedures are in place;
- maintaining oversight of modern slavery risks;
- providing appropriate training and resources;
- taking appropriate action where concerns arise; and
- reviewing the effectiveness of this policy.

16. Review of this Policy

This policy will be reviewed annually, or sooner where there are changes to legislation, regulatory requirements, guidance or the Company's activities.

Policy Owner: Mia Jones, Head of Business Services & Governance

Next Review Date: August 2027