



Modern slavery statement for financial year 2019/20

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 (MSA) and sets out the steps that The Specialist People Services (SPS) Group has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain. SPS has also taken into account the Home Office guidance including, but not limited to, Transparency in Supply Chains and guidance on the statement itself.

SPS makes this statement as we acknowledge our global turnover is above the threshold set by the MSA and expanded upon in Home Office guidance.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. The Specialist People Services (SPS) Group has a zero-tolerance approach to modern slavery in any form. We are committed to acting not only ethically but with integrity and transparency in all business in which we partake and to putting systems and controls in place to effectively safeguard against any form of modern slavery taking place within our businesses and supply chain.

The Specialist People Services Group

The Specialist People Services (SPS) Group aims to bring together and develop businesses that share a common commitment to delivering outstanding customer service and compliance standards, and that are recognised as market-leading specialists in their respective sectors.

We help our customers to maximise the productivity of their workforce, by providing recruitment services, practical, classroom-based and online training, and other people management services. The group consists of a number of businesses across a variety of sectors including both logistics and rail in the UK and Australia. The businesses in the group include:

- **Driver Hire UK** - The UK's leading specialist transport & logistics recruiter, established for over 30 years, and with over 100 offices nationwide (labour supply within the logistics sector)
- **ISS Labour** - a dynamic and expanding rail business with the capability to manage and supply a complete delivery service in track renewals, projects, maintenance and minor works within the UK Railway and Light-Rail Sectors
- **MITA JV** – ISS Labour are part of a joint venture with McGinley Support Services – both companies are working together to fulfil a client's requirements. A copy of McGinley's modern slavery statement can be seen on their website <https://www.mcginley.co.uk>
- **Driver Hire Training** - A market-leading provider of Driver CPC training, with the UK's widest network of trainers, helping almost 30,000 drivers per year (training within the logistics sector)
- **DH Licence Check** - A fast-growing provider of innovative online people management services including dh Licence Check and eLearning modules (digital services provision within the logistics sector)
- **Driver Hire Australia** - Exporting the success of the UK recruitment and training business to new markets, Driver Hire Australia is setting new standards overseas (labour supply within the logistics sector)

Our worldwide turnover for the financial year ending 05/04/2019 was £66,660,523. We are a global business for the purposes of the MSA.

Our approach to Modern Slavery Act

We have risk assessed all of the above businesses (individually and where acting in concert) to identify any risks and if those risks were identified to mitigate them as well as protecting whistleblowers and monitoring risk in our own supply chains. After the risk assessment and check on the policies and monitoring, we revisited the issue of modern slavery to consider whether our approach was effective.

Our high-risk areas

Labour supply is a large part of the SPS Group's operations, it is understood that the sectors that could be likely to be affected by modern slavery and human trafficking are the agriculture, food processing & packaging and textiles. Whilst the SPS Group does very limited work in these sectors all new staff will all receive training to help both prevent and spot signs of modern slavery and human tracking which will apply equally across all sectors in which we operate, which can be seen in the description of the businesses within the group above.

Our policies

We operate a number of internal policies & procedures which help to ensure that we are conducting business in an ethical and transparent manner. These include:

- Modern slavery policy
- Whistle blowing procedure, linked to an awareness of the protection of whistleblowers
- Staff handbook
Code of Conduct

These policies are all linked to the way our business is operated through operational controls, candidate onboarding, labour supply and our engagement with customers and suppliers.

Our suppliers

The SPS Group's supply chain consists primarily of office equipment, IT hardware, IT software and specialist consultancy services. The SPS Group has an agreement with two intermediaries that provides us with payroll services – Paystream & The Sterling Group who are not only market leaders in their field but have also been the subject of thorough due diligence by our legal team.

All candidates who are supplied via SPS are processed appropriately under UK tax laws. We acknowledge the link that potentially exists between tax avoidance/evasion and modern slavery and human trafficking. We also have policies in place to avoid unlawful tax evasion and its facilitation.

The SPS Group will not work with any supplier which conducts their operations in a manner that causes us concern. We have a team of people who consider modern slavery from a compliance perspective and those cover the following areas: Legal, Audit and compliance, Human resources, procurement, and sales. Whilst SPS Group do not import goods and services from abroad a number of the temporary workers that are supplied are

foreign citizens. All temporary workers are individually interviewed prior to undertaking assignments for us and our in-depth ISO 9001:2015 approved processes are followed which are designed to comply with all relevant legislation, including the MSA. An analysis of the Driver Hire UK temporary workforce provided the following background as to the nationality of the temporary workers with whom we engage:

UK Citizens: 82%

EU & EEA Citizens: 12%

Rest of the World: 6%

Whilst citizens from the final category would be considered to be the highest risk of slavery, we undertake the same thorough and in-depth registration processes with all of our candidates.

Supply chains

A breakdown of the companies' supply chains are as follows:

Driver Hire UK – labour supply with an approved payroll supplier relationship with Paystream – an FCSA accredited payroll company who have undergone thorough due diligence.

ISS Labour – provide rail services that are carried out by trained, professional workers around the UK. There is an approved payroll supplier relationship with Sterling - a payroll company who have undergone thorough due diligence.

Driver Hire Training – training materials printed by local suppliers and training undertaken by industry professionals trained in-house.

DH Licence Check – IT services and the DVLA

The SPS Group has no relationships with trade unions.

Training

The Driver Hire network has received training on Modern Slavery, in addition to this, all new starters received training on our internal processes which if followed correctly would help highlight and prevent instances of modern slavery. The training delivered to Driver Hire franchisees (who operate their own businesses under our brand) is covered in the Driver Hire foundation training course. Training is also to be undertaken across the rest of the group.

Other issues

The coronavirus pandemic and lockdowns / homeworking in the UK causes challenges for our business. Notwithstanding these challenges, our risk assessment, monitoring and other methods have continued and will continue during this time. We do not consider the unprecedented challenges caused by the pandemic have impacted our ability to or effectiveness in combatting slavery and human trafficking.

Similarly, the changing position relating to the UK's withdrawal from the EU and the establishment of the new trading regime with the EU (together with other countries such as Turkey) has also been taken into account. We

will continue to consider whether any such significant changes in the international situation change our risk assessment as we acknowledge that modern slavery and human trafficking crosses international borders.

Our performance indicators and our effectiveness in combatting slavery and human trafficking

Following our risk assessment and the review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our supply chain, we currently consider there is no such slavery or human trafficking. We will continue in our efforts in this regard. The clearest indicator that the SPS Group's policies are working will be no reported incidents of modern slavery or human trafficking within the group or our supply chain – be this internal reporting or through law enforcement agencies. Staff are all made aware that incidents can be reported internally to Richard Crook who is the SPS Group contact on matters relating to Modern Slavery. Throughout 2019/20 there has been no instances of modern slavery linked to the SPS Group highlighted by any of the following parties:

- Employees of the business
- Temporary Workers
- Clients

Approval for this statement

This statement was approved by the Specialist People Services Group Board of Directors on 04/01/2021.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 05/04/2021.



Chris Chidley CEO

Date: 04/01/2020