

Modern Slavery & Human Trafficking Policy

1. Introduction

Innovate Hire Solutions is committed to preventing modern slavery, forced labour, and human trafficking in all aspects of our business and supply chains. We operate with a zero-tolerance approach to modern slavery and are committed to acting ethically, transparently, and with integrity in all business relationships.

This statement is made in accordance with the Modern Slavery Act 2015 and outlines the steps we take to prevent modern slavery within our organisation.

2. Our Organisation, Business & Supply Chains

Innovate Hire Solutions is a UK-based recruitment and staffing provider supplying temporary and permanent workers to clients across sectors including education, IT, and professional services.

Our supply chains primarily consist of:

- Directly engaged temporary and permanent workers
- Client organisations
- Limited third-party service providers where applicable

We maintain a straightforward supply chain model, reducing exposure to high-risk labour practices.

3. Policies in Relation to Modern Slavery

We have implemented policies and procedures to ensure ethical conduct and compliance, including:

- Modern Slavery & Human Trafficking Policy
- Equality, Diversity & Inclusion Policy
- Recruitment and Vetting Procedures
- Safeguarding and Compliance Processes

These policies support our commitment to fair treatment, lawful employment practices, and safeguarding of workers.

4. Due Diligence Processes

We undertake robust due diligence to prevent modern slavery risks within our operations, including:

- Verification of identity and right-to-work documentation
- Conducting employment history checks and obtaining professional references
- Ensuring all workers are engaged through compliant UK PAYE arrangements
- Avoiding the use of exploitative or non-compliant intermediaries
- Ensuring no recruitment fees are charged to workers

Where third-party providers are used, we expect them to meet equivalent standards of compliance and ethical practice.

5. Risk Assessment & Management

We recognise that potential risks of modern slavery may arise in recruitment and supply chain activities, particularly in:

- Worker sourcing and on boarding processes
- Right-to-work verification
- Use of third-party providers or intermediaries

To mitigate these risks, we:

- Apply strict pre-employment screening procedures
- Ensure transparency in pay and contractual arrangements
- Monitor compliance with legal and regulatory requirements
- Limit reliance on complex or high-risk supply chain structures

6. Effectiveness & Monitoring

We assess the effectiveness of our approach through the following measures:

- 100% completion of right-to-work checks for all workers
- Full PAYE compliance for temporary staff
- Verification of references and employment history
- On-going compliance monitoring and internal checks

- Zero tolerance reporting and investigation of concerns

We are committed to continuous improvement and will review our processes regularly to strengthen our approach.

7. Training & Awareness

We ensure that staff involved in recruitment and compliance activities are aware of modern slavery risks and understand their responsibilities. This includes:

- Internal guidance on identifying and reporting concerns
- Awareness of legal obligations and ethical recruitment practices

We will continue to develop training and awareness as the business grows.

6. Responsibility & Review

Overall responsibility for this policy lies with company management. This policy will be reviewed annually and updated as required to reflect changes in legislation, guidance, or operational risk.