



MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

Interaction Recruitment PLC

Financial Year Ending: 31 December 2026

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015. It sets out the steps taken by Interaction Recruitment PLC (registered company no. 02408326) ("the Company") to prevent modern slavery and human trafficking within our business operations and supply chains. It applies to all business divisions, including Interaction Recruitment, Interaction Construction, Interaction Industrial, and Interaction Education Group Limited.

Interaction Recruitment PLC is committed to acting ethically, transparently, and with integrity in all business relationships, and to establishing effective systems and controls to safeguard against modern slavery in any form.

1. Organisation Structure, Business & Supply Chains

1.1 Interaction Recruitment PLC is a UK-based recruitment group supplying temporary, permanent, and contract personnel to a range of sectors including:

- Education
- Industrial & Manufacturing
- Commercial & Professional Services
- Construction & Technical
- Driving & Logistics
- Hospitality & Facilities

1.2 Our supply chains include:

- Job boards and talent-sourcing platforms
- Payroll and umbrella companies
- Compliance and background-checking providers
- Training and CPD providers
- IT infrastructure, software and communications systems
- Professional services (audit, legal, insurance, HR and consultancy)

We operate exclusively within the UK and do not source international labour directly; however, indirect risk remains where third-party providers and umbrella companies manage payroll or supply supporting services.

2. Policies on Slavery & Human Trafficking

2.1 Interaction Recruitment PLC maintains a robust suite of policies to prevent modern slavery, exploitation, and unethical practices. These include:

- Anti-Slavery & Human Trafficking Policy
- Whistleblowing Policy
- Equality, Diversity & Inclusion Policy
- Safeguarding & Safer Recruitment Policy (for Education Division)
- Code of Conduct for Workers
- Supplier Code of Conduct
- Recruitment & Vetting Procedures
- Data Protection & Confidentiality Policy

2.2 These policies collectively ensure that:

- All workers are treated with dignity and respect
- No individual is subject to coercion, forced labour, or withheld documents
- Any concerns can be reported confidentially and without fear of retaliation

- We uphold high ethical standards across all business activities

Policies are reviewed annually and updated to reflect legislative or regulatory changes.

3. Due Diligence Processes

3.1 Interaction Recruitment PLC employs strong due-diligence processes when onboarding work-seekers, staff, and suppliers.

3.2 For Work-Seekers:

- Identity verification (original documents only)
- Right-to-Work confirmation following Home Office guidance
- Address and employment history checks
- References covering minimum required periods
- Enhanced DBS and Barred-List checks for education roles
- Monitoring for indicators of vulnerability or exploitation (shared addresses, bank accounts, coercion concerns)

3.3 For Suppliers:

- Mandatory assessment of their Modern Slavery Statement (where legally required)
- Review of ethical and compliance policies
- Contractual obligation to meet Modern Slavery Act requirements
- Annual supplier risk review
- Immediate termination where unethical practices are suspected or confirmed

3.4 For Internal Staff:

- Contractual clauses forbidding involvement in exploitation or forced labour
- Requirement to report concerns or unethical behaviour immediately

Where concerns are raised, we investigate promptly and cooperate fully with law-enforcement bodies.

4. Risk Areas & Risk Management

4.1 We recognise increased risk in specific areas of the recruitment supply chain, including:

- Use of external umbrella companies for payroll
- Lower-skilled temporary labour markets
- Situations where workers may be financially vulnerable
- Supply chains involving subcontracted service providers
- Remote or high-turnover work environments

4.2 To manage these risks, we:

- Restrict partner networks to audited and approved suppliers
- Conduct regular welfare checks with temporary workers
- Monitor for signs of labour exploitation
- Provide direct access to reporting routes for workers
- Carry out periodic risk assessments aligned with REC Audited standards
- Suspend or cease supply immediately where concerns exist
- Escalate safeguarding concerns to the police, local authority or Modern Slavery Helpline where appropriate

5. Measuring Effectiveness

5.1 We monitor our effectiveness in preventing modern slavery through:

- KPIs and Performance Measures
- 100% completion of right-to-work and identity checks
- 100% verification of DBS for education workers
- Monitoring of suppliers' Modern Slavery compliance
- Annual internal audit of recruitment, vetting and supply chain processes
- Tracking and recording of all welfare checks and concerns raised
- Training completion rates (see below)
- Zero-tolerance approach to suppliers failing compliance standards
- Immediate action in any case where exploitation is suspected

5.2 Audit & External Oversight

- REC Education Audited inspections

- Internal compliance audits
- Periodic reviews by external professional advisors

These processes ensure continuous improvement, accountability and high compliance standards.

6. Training & Capacity Building for Staff

6.1 Training is a key component of our anti-slavery strategy. All staff receive training in:

- Identifying signs of modern slavery and labour exploitation
- Understanding obligations under the Modern Slavery Act 2015
- How to report and escalate concerns
- Ethical recruitment principles
- Risks associated with third-party suppliers and umbrella companies
- Worker welfare monitoring
- Sector-specific safeguarding risks (especially in education)

6.2 Training Delivery Includes:

- Formal induction training for all new staff
- Annual mandatory refresher training
- Role-specific modules for compliance, recruitment consultants and managers
- Updates provided following legislative or regulatory change
- Access to external CPD, REC guidance, and best-practice resources

Records of training are maintained and staff must sign formal training declarations.

7. Approval & Signature

7.1 This statement has been approved by the Board of Directors of Interaction Recruitment PLC and will be reviewed and updated annually.