



Fusion Personnel Limited Modern Slavery Policy – January 2026

1. Overview

Fusion Personnel Ltd is committed to preventing modern slavery, human trafficking, forced labour, and all forms of labour exploitation within our business and associated operations. We recognise that exploitation can occur in hidden and complex ways, particularly within the recruitment and labour supply sector, and we take our responsibilities seriously.

Where risks are identified, we are committed to acting promptly and responsibly to protect individuals, support victims, and address any shortcomings in our processes.

2. Our Commitment

Fusion Personnel Ltd is committed to operating ethically, transparently, and with respect for human rights. We do not tolerate modern slavery, forced labour, or hidden labour exploitation in any part of our operations.

We recognise that tackling exploitation requires cooperation across the recruitment process. We therefore work with clients, workers, suppliers, and relevant industry bodies to share learning and improve standards. To support this approach, we are registered with **Stronger Together** and make use of their guidance and resources.

We are committed to the **Employer Pays Principle**, which states that no worker should pay for a job. Recruitment-related costs must be borne by the employer, not the worker, and this principle is embedded throughout our recruitment and placement practices.

3. Scope and Application

This policy applies to:

- All Fusion Personnel Ltd employees and directors
- All agency workers supplied directly or indirectly
- Relevant suppliers and service providers
- Any third party acting on behalf of Fusion Personnel Ltd

All parties are expected to comply with the principles set out in this policy.

4. Governance and Accountability

Responsibility for modern slavery and hidden labour exploitation sits with senior management.

- Director-level oversight ensures accountability and strategic direction
- Day-to-day responsibility for implementation and monitoring sits with the management team
- This policy is reviewed **annually** to ensure it remains effective and reflects changes in legislation, guidance, and operational learning.

5. Defining Hidden Labour Exploitation

Hidden labour exploitation refers to situations where workers or job applicants are exploited by third parties, including individuals or organised groups, sometimes operating without the knowledge of management within otherwise legitimate environments.

This may include, but is not limited to:

- Forced labour or human trafficking for labour exploitation
- Payment of job-finding or recruitment fees
- Retention of identity documents
- Excessive or unexplained wage deductions
- Forced use of accommodation
- Restrictions on freedom of movement
- Intimidation, threats, or coercion

6. Training and Awareness

All staff involved in recruitment, worker registration, compliance, and worker management receive training on modern slavery and hidden labour exploitation.

Training:

- Is provided during induction
- Is refreshed periodically
- Covers recognising warning signs, reporting concerns, and individual responsibilities

Staff responsible for recruiting and managing workers are expected to remain alert to indicators of exploitation and to act in accordance with this policy.

7. Risk Identification and Monitoring

Fusion Personnel Ltd takes a proactive approach to identifying and managing risks through:

- Regular engagement with workers, including one-to-one conversations
- Site visits and client engagement where appropriate
- Review of worker records and recruitment data
- Weekly team briefs to discuss concerns and emerging risks
- Feedback from clients, workers, and relevant partners

8. Supply Chain Due Diligence

As a recruitment agency supplying workers to client businesses, Fusion Personnel Ltd recognises that risks of labour exploitation can arise not only within recruitment activities, but also through third parties that support our operations.

Our supply chain is limited and proportionate to the nature of our business and may include payroll providers, compliance services, training providers, and other service partners operating on our behalf.

To manage these risks, we:

- Carry out appropriate checks on suppliers relevant to the services they provide
- Seek assurance that suppliers operate lawfully and ethically
- Include contractual provisions allowing termination where modern slavery, labour exploitation, or serious non-compliance is identified or suspected

Fusion Personnel Ltd does not knowingly work with any organisation that supports or is involved in slavery, servitude, forced or compulsory labour, or human trafficking.

9. Employer Pays Principle

Fusion Personnel Ltd strictly applies the Employer Pays Principle.

- Workers must not pay for work-finding services
- We do not engage any individual or organisation to source workers without confirming that no recruitment fees have been charged
- Any breach of this principle will be treated seriously and investigated.

10. Reporting and Investigation

Reporting Concerns

All staff, workers, and third parties are encouraged to report concerns or suspicions relating to modern slavery or hidden labour exploitation.

Reports can be made through:

- Line management
- Raj Kaur (Office Management)
- Harjit Singh (HR Director)
- Our confidential internal reporting mechanism
- External bodies such as the Gangmasters and Labour Abuse Authority (GLAA) or the police

Information on reporting is provided during induction and displayed on staff notice boards. All reports are treated confidentially and handled sensitively.

Investigation Process

All concerns are:

- Taken seriously
- Investigated promptly and professionally
- Documented appropriately

Where required, matters are escalated to the relevant authorities.

11. Our Response to Identified Issues

Where modern slavery or hidden labour exploitation is identified or suspected, Fusion Personnel Ltd will take appropriate action, which may include:

- Reporting concerns to the GLAA, police, or other authorities
- Requiring corrective action from suppliers or partners
- Removing suppliers from approved arrangements
- Supporting affected individuals through appropriate remediation
- Taking disciplinary action against employees involved, up to and including dismissal
- Reviewing internal processes to prevent recurrence

12. Compliance and Regulation

Fusion Personnel Ltd operates in compliance with the **Modern Slavery Act 2015** and relevant UK employment legislation.

We are:

- **Licensed by the Gangmasters and Labour Abuse Authority (GLAA)**
- **Members of the Association of Labour Providers (ALP)**
- **Registered with Stronger Together**

Information on how to raise concerns and access relevant regulatory bodies is provided to staff and workers through induction, notice boards, and internal communications.

13. Communication and Transparency

Our Modern Slavery and Hidden Labour Exploitation Policy is made available to staff and is published on our website: www.fusionpersonnel.co.uk

14. Related Policies and Procedures

This policy should be read alongside relevant sections of our staff handbook, recruitment procedures, and internal standards that support ethical recruitment, worker welfare, and compliance with employment legislation.

15. Continuous Improvement

Fusion Personnel Ltd recognises that risks associated with modern slavery and labour exploitation evolve over time. We are committed to reviewing and strengthening our approach in response to learning, feedback, and changes in best practice.

16. Document Details

Policy Title: Modern Slavery and Hidden Labour Exploitation Policy

Originally Adopted: 1 January 2019

Last Updated: January 2026

Review Frequency: Annually

Signed by:

Harjit Singh

Title: HR Director

Date: 19 January 2026