

Modern Slavery Policy

Recruit with Purpose Limited

Version 2.0 | Updated 21 October 2026 | Review due 21 October 2027

1 Purpose and commitment

Recruit with Purpose Limited (RWP) is committed to preventing modern slavery, human trafficking, servitude and forced or compulsory labour in our business and supply chains. We take a zero-tolerance approach to exploitation and are committed to compliance with the Modern Slavery Act 2015 and applicable anti-trafficking and employment legislation throughout the UK.

Modern slavery involves exploitation that a person cannot freely refuse or leave because of threats, coercion, deception or abuse of power. It can affect anyone, including people with a lawful right to work in the UK.

This policy sets the standards expected of our directors, employees and workers. It also explains our expectations of contractors, suppliers, recruitment intermediaries and clients, and how candidates and other external parties can raise concerns.

2 Our business and relationships

RWP provides permanent, interim and contract recruitment for the social housing sector, including technology, digital, data, transformation and executive search. Our responsibilities extend to our own people and to the candidates and workers we introduce, engage or supply.

Our suppliers include providers of technology, professional and office services and, where used, umbrella companies, payroll providers, subcontractors and other recruitment intermediaries. Clients are the organisations receiving our recruitment services; candidates and workers are the people whose rights and welfare we seek to protect.

We expect clients and suppliers to comply with applicable law, respect workers' rights and cooperate with proportionate checks and any investigation of exploitation concerns. A professional role or UK-based supplier does not remove the need to consider risk.

3 Accountability

Henry Ivall, Director, is the policy owner. He is responsible for implementation, oversight of concerns, arranging training and the annual review. James Ivall, Director, is the alternative contact if Henry is unavailable or a concern involves him.

Employees must understand this policy, remain alert to warning signs and report concerns promptly. Directors must ensure that decisions, checks, training and follow-up actions are recorded appropriately. Breaches by employees may lead to disciplinary action, following a fair process.

4 Prevention and due diligence

The following requirements apply to our recruitment activity and supplier management. Checks must be proportionate to the relationship and risks, with further enquiries where warning signs arise.

- Identity and right to work: complete and record identity and relevant right-to-work checks in line with our legal responsibilities and the engagement arrangement. These checks must be supported by attention to exploitation risks.
- Free choice: confirm that candidates and workers understand the role and agree freely to the engagement. They must be able to raise concerns and leave an engagement in accordance with lawful contractual terms, without threats or coercion.
- No work-finding fees: candidates and workers must not be charged fees by RWP for finding or trying to find them work. Investigate concerns about recruitment fees or debts imposed by intermediaries.
- Documents: original passports and identity documents must not be retained to control a person or restrict their movement. Return originals promptly after any necessary examination; store required copies securely.
- Pay and terms: provide clear information about pay and working arrangements. Comply with applicable minimum wage, holiday pay and other employment requirements. Do not make unlawful deductions or unlawfully withhold wages. Scrutinise unexplained deductions or payments controlled by a third party.
- Suppliers and intermediaries: assess relevant risks before engagement and review them periodically or when circumstances change. For umbrella companies, payroll providers and other intermediaries, consider who employs and pays workers, deductions, subcontracting and arrangements for reporting concerns.
- Client and supplier standards: communicate our expectations and seek proportionate evidence of compliance. Use appropriate contractual safeguards and record material concerns, agreed improvements and follow-up checks. A supplier policy alone is not proof that exploitation is absent.

5 Recognising warning signs

Possible indicators include a person appearing frightened or controlled, another person speaking for them or holding their documents, inability to access their own wages, unexplained deductions or debts, threats, restrictions on movement, or signs of abuse.

An indicator is a reason to make a safe enquiry or report a concern; it is not proof of modern slavery. Staff must not rely on assumptions about nationality or immigration status, confront a suspected exploiter, or put a potentially affected person at greater risk.

6 Reporting concerns

Employees must report suspicions promptly. Candidates, contractors, suppliers, clients and other external parties are encouraged to use the same routes. Proof is not required before raising an honestly held concern.

Primary contact: Henry Ivall, Director — henry@recruitwithpurpose.co.uk

Alternative contact: James Ivall, Director — james@recruitwithpurpose.co.uk

Contact James if Henry is unavailable or implicated. If either internal route is unsuitable, contact the police or an independent support service directly. Internal reporting must never delay urgent help.

Call 999 if someone is in immediate danger, or 101 for a non-emergency police report. Independent advice and reporting are available through the Modern Slavery and Exploitation Helpline at modernslaveryhelpline.org. These external routes can be used without RWP's permission.

Reports will be handled sensitively and shared only where necessary and lawful, including with authorities or to protect someone from harm. Absolute confidentiality cannot be guaranteed. No one will suffer retaliation or detriment from RWP for raising an honestly held concern or assisting an investigation, even if the concern is not substantiated. Retaliation must be reported to a director.

7 Responding to concerns

The responsible director must assess concerns promptly, prioritise the affected person's safety, keep a secure record and seek appropriate advice from the police or specialist support services. Staff must not attempt a criminal investigation themselves. Involve the affected person in decisions where safe and appropriate, and share personal information only on a lawful basis.

Where concerns involve a client, supplier or intermediary, assess immediate safeguards and corrective action. Suspension or termination may be appropriate, subject to contractual and legal obligations, but consider the risk of further harm to affected workers. Support access to appropriate assistance, cooperate with lawful investigations and review the effectiveness of remedial action.

8 Training and awareness

Directors are responsible for arranging induction guidance and proportionate refresher training, with additional guidance for candidate-facing and compliance roles. Training must cover warning signs, reporting and safe responses. Keep a record of training, attendance and any outstanding actions, and make this policy accessible to staff and external parties.

9 Monitoring and review

The policy owner must review this policy at least annually and sooner following relevant legal changes, significant incidents or changes to our business. The review must consider training records, due diligence, concerns raised and the completion of corrective actions. Where an annual statement is required under section 54 of the Modern Slavery Act 2015, it will be prepared and approved separately.

Policy owner: Henry Ivall, Director. Next scheduled review: 21 October 2027.