Modern Slavery and Labour Exploitation Statement

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Approved by	Nicholas Ryan, Director
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This policy states the corporate position for clients, candidates, workers, suppliers and stakeholders as applicable.

Modern Slavery and Labour Exploitation Statement

Ignite rejects slavery, servitude, forced labour, human trafficking and labour exploitation. Recruitment and labour supply can expose businesses to exploitation risks, particularly where temporary work, complex supply chains, umbrella arrangements or construction labour are involved.

Purpose

This statement explains how Ignite seeks to prevent modern slavery and labour exploitation in its recruitment operations, worker supply chains and client-facing activity.

It applies even where Ignite is not legally required to publish a statutory statement, because clients, candidates and framework assessors expect recruitment businesses to show clear controls.

Scope

This policy applies to Ignite Talent Group Ltd and to each Ignite recruitment vertical where the policy is relevant to its operations, client work, candidates, workers, consultants, employees and supply-chain relationships.

Where a vertical has a sector-specific requirement, that requirement should be read with the relevant appendix or operational procedure. Construction-specific controls are applied more rigorously where client sites, labour supply, temporary assignments, training evidence or framework onboarding require additional assurance.

Policy commitments

- Never knowingly support forced labour, trafficking or worker exploitation.
- Never charge work-seekers unlawful fees for work-finding services.
- Require transparent pay, assignment and umbrella information where applicable.
- Maintain right-to-work and identity checks proportionate to the role and engagement model.
- Escalate concerns about coercion, document retention, debt bondage, threats, unsafe housing, wage abuse or unusual control over workers.
- Promote worker dignity, fair treatment and lawful recruitment practice.

Responsibilities

Directors and senior leaders

- Set the policy direction, provide resources, and maintain accountability for the governance framework.
- Ensure material risks are reviewed and that controls remain proportionate to the size, risk profile and vertical activity of the group.

Managers and consultants

- Apply the policy in day-to-day recruitment, client, candidate and worker interactions.
- Keep records accurate and escalate gaps, concerns or client requirements promptly.

Employees, workers and representatives

- Act honestly, follow approved processes, protect confidential information and report concerns without delay.

How this policy is applied

Recruitment and worker screening

Ignite will use identity, right-to-work and candidate vetting processes to reduce the risk of exploitation. Screening should be proportionate and must be conducted fairly, consistently and lawfully.

- Check candidate identity and right to work before placement where Ignite has that responsibility.
- Look for warning signs such as third-party control, reluctance to speak independently, inconsistent identity documents or unusual payment arrangements.
- Escalate concerns to management before a placement proceeds.

Worker-paid fees and deductions

Ignite does not charge work-seekers for work-finding services where such fees are unlawful. Pay deductions, uniform charges, training charges or administration deductions must not be used to conceal exploitation.

- Any deduction or charge must be lawful, transparent and documented.
- Workers should receive clear information on who pays them and how pay is calculated.
- Concerns about umbrella or payroll deductions must be investigated.

Umbrella, PSC and supplier due diligence

Where umbrella companies, payroll intermediaries, PSCs or suppliers are involved, Ignite will seek appropriate assurance that arrangements are lawful, transparent and do not expose workers to exploitation.

- Maintain a list of approved umbrella or payroll providers where used.
- Review supplier terms, worker information and escalation routes.
- Remove or suspend suppliers where credible exploitation concerns arise.

Construction labour supply

Construction labour supply carries heightened risks because of temporary labour, site mobility, subcontracting chains, cash-flow pressures and migrant labour risk. Ignite Construction Talent Ltd applies enhanced controls to construction placements and client onboarding.

- Confirm site, role, pay, shift and supervision arrangements as clearly as possible.
- Avoid undisclosed substitution or onward subcontracting of labour.
- Escalate concerns where workers appear to be controlled by third parties.

Reporting and response

Concerns may be raised by employees, workers, candidates, clients or third parties. Reports will be assessed, escalated and, where appropriate, referred to external authorities or specialist advice.

- Protect those who raise concerns in good faith.
- Record concerns and action taken.
- Review trends and controls after any confirmed or suspected issue.

Records and evidence retained

- Modern slavery statement and annual review record.

- Right-to-work and identity-check logs.
- Candidate vetting records.
- Supplier and umbrella due diligence records.
- Reports of suspected exploitation and actions taken.
- Training or awareness records for consultants involved in labour supply.

Reporting concerns

Questions, concerns or requests for further information should be raised through the relevant manager or through the group compliance contact at compliance@ignitetalentgroup.co.uk.

Concerns involving wrongdoing, unsafe practice, exploitation, bribery, unlawful discrimination, data protection or serious non-compliance may also be escalated under the Whistleblowing and Speak-Up Policy.

Approval and review

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Position	Director
For and on behalf of	Ignite Talent Group Ltd
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