



# Disrupt Talent Limited

## Modern Slavery Policy

### Statement of Commitment

Disrupt Talent Limited has a zero tolerance approach to modern slavery. We are committed to acting ethically, with integrity and transparency in all business dealings and relationships. We enforce effective systems and controls to ensure that modern slavery, human trafficking, and hidden labour exploitation are not taking place anywhere within our business or supply chains.

Hidden labour exploitation refers to the exploitation of job applicants and workers by third-party individuals or gangs, outside of the knowledge of the employer or labour provider. This can include forced labour, human trafficking, charging for work-finding services, or coercion into forced accommodation. Such practices are often well concealed, with victims reluctant to come forward.

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### Coverage

This policy applies to all operations of Disrupt Talent Limited.

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### Responsibility

- **Board-Level Responsibility:** The Managing Director, **Nicky Grogan**, leads our work on modern slavery and hidden labour exploitation.
- **Implementation:** Day-to-day management and reporting sit with the senior leadership team.
- **Operational Responsibility:** Consultants and managers involved in candidate registration and recruitment are responsible for applying this policy consistently and with due diligence.

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### Our Commitments

Disrupt Talent Limited shall:



1. Maintain membership and engagement with recognised initiatives such as **Stronger Together**, to support learning and access up-to-date resources.
2. Ensure all managers responsible for recruitment and worker engagement receive **Tackling Hidden Labour Exploitation** training, and are accountable for implementing procedures in this area.
3. Accept that job-finding fees are a business cost and never allow these to be paid by job applicants or workers.
4. Never use any individual or organisation to source and supply workers without confirming that workers are not being charged fees.
5. Ensure all staff responsible for directly recruiting workers are trained to identify risks and signs of third-party labour exploitation, and have signed the relevant compliance documentation.
6. Ensure labour sourcing, recruitment, and worker placement processes are controlled by trusted and competent staff.
7. Take a proactive approach to reporting suspicions of hidden worker exploitation to the appropriate authorities, including the **Gangmasters and Labour Abuse Authority (GLAA)** and the police.
8. Provide information on tackling hidden labour exploitation to workers in a variety of formats, such as posters, leaflets, induction materials, and training.
9. Encourage workers to report suspected cases of hidden third-party exploitation, provide accessible reporting channels, and act appropriately on reports.
10. Support employees and workers to report exploitation occurring within their communities, whether by raising concerns with a trusted manager, contacting our leadership team directly, or calling the **Modern Slavery Helpline on 0800 0121 700**.
11. Voluntarily publish our **Modern Slavery Statement** on our website to demonstrate transparency and accountability.

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## Breach of the Policy

Any employee found to be in breach of this policy will face disciplinary action, up to and including dismissal for gross misconduct.

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### Signed by:

Nicky Grogan

Managing Director, Disrupt Talent Limited

**Date:** 29 September 2025

**Review Date:** 29 September 2026