



**GLADSTONE  
BROOKES**<sup>LTD</sup>

Gladstone Brookes Ltd  
**Director's 2021 Statement on  
Slavery and Human Trafficking**

### **Introduction from the Director**

Over the last year, Gladstone Brookes has remained committed to our goal of acting fairly, ethically and transparently in everything we do.

In the report period of 2019/2020, our focus has remained on the Fair Treatment of all staff inclusive of our supply routes. We have continued to observe the requirements of the Modern Slavery Act 2015 (the Act) and understand that they reflect the international drive to eradicate modern slavery in commercial organisations.

Our aim has remained to aid with upholding this international goal by ensuring that any risk of modern slavery or human trafficking in our supply chains and in any part of our business is offset by the reasonable measures that we take as a business to identify and whilst some monitoring has been slowed down by or adapted to accommodate for the Coronavirus pandemic, we have still made good progress on the achievement of our Modern Slavery KPI.

As our business is in wind down, we do not plan to taken on new suppliers, however, if we did we would consider MSA compliance in the pre-contractual Due diligence. We continue to consider the potential for Modern Slavery and Human Trafficking in the ongoing relationships with all of our suppliers in the UK and overseas and review this at least annually.

We recognise the risks that modern slavery poses and raise awareness amongst our staff and outsourced agents to ensure if these risks ever materialise our team are equipped with the necessary information to understand what action to take (and what not to!)

It remain our intention to lead by example in our direct operations and ensure that our supply chains duly follow suit. Further information on our approach to Anti- Slavery can be found below and is supplemented by our Policies on Anti-Money Laundering, corruption, gifts & hospitality And Employee Recruitment procedure.

### **Organisation's structure**

Gladstone Brookes are a solo product firm. As this product was PPI and in light of the PPI deadline, Gladstone Brookes have not taken on any new business since 29<sup>th</sup> August 2019. As a result of this our organization has shrunk considerably over the last 12 months, both in terms of current customers that we service and the volume of staff that we employ.

At the time of writing, GB still remain a provider of Financial Claims Services in the Claims Management sector until 24<sup>th</sup> June, after which point, we will exit the market. We are not a part of a group of companies, and company is a private limited company. Gladstone Brookes

Ltd has its head office in the United Kingdom. We have 57 employees and agents worldwide and operate in the United Kingdom and South Africa.

**Our business** <https://www.gladstonebrookes.co.uk/>

As disclosed in our 2020 statement, we no longer take on new business relating to PPI.

Our business is organised into 3 business units:

- **Pre-decision** This unit deals with ongoing cases before a decision is issued by the lender.
- **Post-decision** This unit deals with ongoing cases after a decision is issued by the lender.
- **Lead Generation** This unit deals with the generation of leads for firms supplying other services within the sector.
- **Head Office** Deal with back office functions such as accounting, training and compliance.

After the 24<sup>th</sup> June, we anticipate that the following departments shall remain:

- **Post-decision-** Collections
- **Head office** – Accounts, Complaints & Compliance

### **Our supply chains**

The latest list of our supplier of services can be located in Section 8 of our Privacy Policy which can be located on line at <https://www.gladstonebrookes.co.uk/privacy-policy/>. This is likely that we will have a reduction live suppliers after 24<sup>th</sup> June 2021 however, we will retain any suppliers for services that we have supplied to customer for the period of which we retain their data in the interest of ongoing transparency with former customers.

### **Our policies on slavery and human trafficking.**

We remain committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our policies around Modern Slavery have not changed. These reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

### **OUR APPROACH TO DOING BUSINESS AND SOCIAL STANDARDS**

In the period of 31<sup>st</sup> December 2020 to 30<sup>th</sup> December 2021, we intent to continue with our due diligence process for slavery and human trafficking and

#### **Due diligence processes for slavery and human trafficking**

In 20/21, we will make appropriate checks with any remaining outsourced suppliers to ensure that all staff are treated fairly and in line with the Act. In order to do this effectively, we have in place systems to:

- Identify and assess potential risk areas internally & in our supply chains.

- Mitigate the risk of slavery and human trafficking occurring internally & in our supply chains.
- Monitor potential risk areas internally & in our supply chains.
- Protect whistle blowers.

### **Supplier adherence to our Policy**

We have zero tolerance to slavery and human trafficking.

To ensure those in our supply chain and contractors are aligned with our values, we have in place a supply chain compliance programme consisting of:

- checking whether the supplier or contractor has to comply with the act in it's own right or;
- Has a policy on recruitment which includes checking and recording of Identification and right to work in the relevant country.
- Desk based checks of HR records
- Onsite GB staff at overseas outsourced centres
- Onsite/ virtual visits to the premises of Key suppliers to ensure adequacy of working conditions through verbal statements from employees and physical evidence.

We have a dedicated compliance team, which consists of involvement from the following:

- Audit & compliance
- Human resources & Training
- Procurement

To ensure a high level of understanding of the risk of modern slavery and human trafficking in our supply chains and our business, we:

Circulate our policy on Modern Slavery to:

- our staff,
- customer facing outsourced agents acting on behalf of GB
- to suppliers who provide a service to GB

Training on Modern Slavery indicators and processes to:

- our staff and
- customer facing outsourced agents acting on behalf of GB

Where our business partners are not obliged to comply with the Act themselves, we require them to adhere to our policy on Modern Slavery.

### **Our effectiveness in combating slavery and human trafficking**

Over the reporting period 31<sup>st</sup> December 2019-30<sup>th</sup> December 2020, we reviewed the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Adequate safe guarding is in place surrounding Recruitment within supply chains and the Organization itself.

- Confirmation of staff treatment, hours, breaks etc.
- Contracts with suppliers are in place, Pre-contractual check and site visits ensure that Supplier practices are compliant with Modern Slavery Act 2015.
- Awareness regarding whistle blowing procedure.
- Number of breaches occurred

We have been successful in meeting our MSA related KPIs in 19/20. Having Staff on site at our overseas outsourcing has enabled us to continue checks at a pre-covid level. However, due to covid we have confirmed with our UK out-sourcing suppliers via a remote visit.

One supplier, did not confirm within the reporting period however, the site has been attend pre-covid restrictions and no issues were identified. Training on MSA has been provided to all GB and its outsourced call and admin centres' relevant staff during the reporting period.

MSA KPIs						
	• Adequate safeguarding is in place surrounding Recruitment within supply chains and the Organization itself.	• Confirmation of staff treatment, hours, breaks etc.	• Contracts with suppliers are in place. Pre-contractual check and site visits ensure that Supplier practices are compliant with Modern Slavery Act 2015.	• Awareness regarding whistle blowing procedure.	• Number of breaches occurred	MSA Awareness Training Supplied
<b>GB</b>	Yes - Checked	Yes - Checked	Yes	Yes	None	Yes
<b>Outsourced Call Centre SA</b>	Yes - Checked	Yes - Checked	N/A	Yes	None	Yes
<b>Outsourced Admin Centre SA</b>	Yes - Checked	Yes - Checked	N/A	Yes	None	Yes
<b>Outsourced postal service Centre UK</b>	Yes- advised verbal remote visit	Yes- advised verbal remote visit	N/A	Yes- advised verbal remote visit	None	No
<b>Outsourced Scanning Service UK</b>	Yes- advised verbal remote visit	Yes- advised verbal remote visit	N/A	Yes- advised verbal remote visit	None	No
<b>Outsourced Confidential waste disposal</b>	Onsite visit Covid- Affected	Onsite visit Covid- Affected	N/A	Yes	None	No

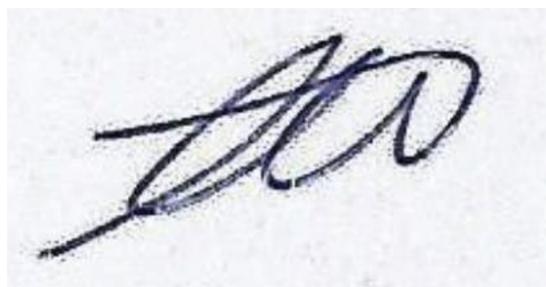
## Further steps

In 20/21, we will look to obtain written confirmation from all outsourced suppliers on the adherence to the above KPIs. We will also issue an MSA Awareness Document to our key suppliers, which outlines indicators, action to take and how to whistle blow to GB as well as maintaining onsite oversight of overseas outsourcing.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Gladstone Brookes Ltd's slavery and human trafficking statement for the financial period of 31<sup>st</sup> December 2019 to 30<sup>th</sup> December 2020.

Anthony Chorlton, Director.

SIGNATURE:

A handwritten signature in dark ink, appearing to be 'AC', written on a light-colored, textured surface.

Gladstone Brookes Ltd Date: May 2020.