

Policy on Preventing Hidden Labour Exploitation

Workforce Staffing Ltd has a zero tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all of its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within its own business or in any of its supply chains.

Hidden labour exploitation is exploitation of job applicants and workers by third party individuals or gangs other than the employer or labour provider including rogue individuals working within these businesses but without the knowledge of management. It includes forced labour and human trafficking for labour exploitation; payment for work-finding services and work-related exploitation such as forced use of accommodation. It is understood that it is often well hidden by the perpetrators with victims, if they perceive of themselves as such, reluctant to come forward.

Coverage

This policy applies to all Workforce Staffing Ltd branches and sites.

Responsibility

The Branch Operations Director has overall responsibility for implementing and reviewing this policy, monitoring its use and effectiveness and auditing internal control systems and policies and procedures.

Our Commitments

Workforce Staffing Ltd shall:

1. Designate appropriate managers (all branch/deputy managers) to attend Tackling Hidden Labour Exploitation training and to have responsibility for developing and operating company procedures relevant to this issue.
2. Accept that job finding fees are a business cost, and will not allow these to be paid by job applicants. The Company will not use any individual or organisation to source and supply workers without confirming that workers are not being charged a work finding fee.
3. Ensure that all staff responsible for directly recruiting workers are trained to be aware of issues around third party labour exploitation and signs to look for and have signed appropriate Compliance requirement documentation.
4. Ensure that labour sourcing, recruitment and worker placement processes are under the control of trusted and competent staff members.
5. Adopt a proactive approach to reporting suspicions of hidden worker exploitation to the Gangmasters Licensing Authority and police.
6. Provide information on tackling "Hidden Labour Exploitation" to our workforce through (in a variety of formats such as workplace posters, worker leaflets, inductions, other training).
7. Encourage workers to report cases of hidden third party labour exploitation, provide the means to do so and investigate and act on reports appropriately.
8. Positively encourage and support employees and agency workers to report such exploitation which may be occurring within their communities, by telling a trusted manager or worker representative, contacting our Branch Operations Director, or by calling the government's Modern Slavery Helpline on 0800 0121 700.

Breach of the Policy

Any employee who breaches this policy will face disciplinary action, up to and including dismissal for gross misconduct.