

PREVENTING HIDDEN LABOUR EXPLOITATION

Policy Statement

The Just Recruitment Group will not tolerate any form of labour exploitation of job applicants, colleagues or agency workers by any individual or group of individuals. We are committed to working with all relevant organisations including StrongerTogether, the Gangmasters Licencing Authority (GLA) and the police to eradicate such practices and to protect workers.

Hidden labour exploitations is defined as the exploitation of job applicants and/or workers (agency or staff) and can include such practices as forced labour, human trafficking for labour exploitation, payment for work-finding services and work-related exploitation such as forced use of accommodation.

The purpose of this policy is to provide clarity to all Just Recruitment Group's Managers, staff, agency workers, clients and suppliers on the Company's standards, processes and actions that it commits to take in order to protect workers from the threat of labour exploitation.

The Just Recruitment Group Directors are responsible for the deployment of this policy and implementing procedures to the Company's Managers, staff, agency workers, clients and suppliers.

The Just Recruitment Group Directors will provide the necessary training, including training approved by the Gangmasters Licensing Authority (GLA), to ensure the appropriate level of competence to all Just Recruitment Group staff.

Our policy commitments

All recruitment, agency sourcing and training placement processes will be managed by competent Just Recruitment Group staff members. Job applicants will not be charged fees for work of any kind, whether temporary or permanent. The Just Recruitment Group will work proactively with relevant bodies to educate and raise the awareness of staff, clients and agency workers of the importance of reporting suspected cases of hidden labour exploitation and how to report concerns.

Policy Commitments

The Just Recruitment Group shall:

1. Designate appropriate managers to have responsibility for developing and operating company procedures relevant to this issue.
2. 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 aware of issues around third party labour exploitation and signs to look for.
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 workplace posters, emailed newsletters and 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.
9. Require labour providers and other organisations in the labour supply chain to adopt policies and procedures consistent with the above.

Our Protocols

Any complaint or concern of hidden labour exploitation must be reported to a Just Recruitment Group Director before any steps are taken to investigate the matter. Complaints and/or concerns investigated will be consulted with a GLA Officer.

Due to the potential for criminal involvement and/or criminal prosecution, the following protocols will be followed:

- Suspected victims of labour exploitation and/or complaints will be treated with sensitivity and confidentiality maintained at all times.
- Meetings with complainants and/or victims may be conducted off site and outside normal working hours as necessary to maintain confidentiality.
- In cases where it is believed that the complainant or the alleged victim of the hidden labour exploitation is at risk of violence or harm, the Just Recruitment Group Director will immediately report the case to the Police.
- The Just Recruitment Group will use interpreters either nominated by the complainant and/or the victim, or supplied by an independent, external company.
- Where the GLA request attendance at a meeting, this will be permitted only with the express consent of the complainant and/or the victim.
- The Just Recruitment Group investigating Director will utilise guidance from StrongerTogether with regards to minimum standards of questions to be asked.
- Detailed notes of case meetings will be maintained throughout the process in order to assist the Police and GLA in the event of a criminal prosecution.

The Just Recruitment Group will ensure that every recruiter will:

- 1 Only interview applicants in an approved location.
- 2 Not allow job applicants to complete registration documents on behalf of others.
- 3 Not accept money, favours or any gifts at all from job applicants or workers.
- 4 Not loan any personal money to temporary workers.
- 5 Notify a Just Recruitment Director/Manager when informed by a job applicant or worker that they have paid money to be introduced to the Company.
- 6 Not allow unauthorised agents or individuals to introduce job applicants to the Company including friends, family or "local contacts" to source workers to satisfy urgent demand.
- 7 Notify a Just Recruitment Group Director/Manager when suspecting an individual of introducing job applicants to the Company for personal gain.
- 8 Not act as a landlord or be involved in the provision of accommodation, transport or other paid for services to workers.
- 9 Not allow anyone other than a person authorised by Just Recruitment Group to choose which workers are selected for work shifts.
- 10 Not force or coerce temporary workers to work against their will.
- 11 Not threaten or subject workers to physical or mental mistreatment.
- 12 Treat applicants and workers with dignity and respect.
- 13 Raise any knowledge or suspicions of illegal or dubious activities regarding agents, temporary workers or colleagues to a Just Recruitment Group Director/Manager immediately.

With effect from January 2018, the initial training to make Employees aware of how to recognise and prevent hidden labour and exploitation is undertaken during their induction training. Regular training and discussion is delivered by our Compliance Officer to ensure that their staff are aware of how to recognise and what to do on a day to day basis. For further details call Head Office on 01206 230322.