

COMPANY POLICY AND OPERATING PROCEDURE PREVENTING HIDDEN LABOUR & EXPLOITATION

Doc Ref: JT(TSG)PHLE

Definitions

“The Company”, “Us”, “We” means Jobandtalent (formerly The Staffing Group) incorporating Single Resource Ltd, Extra Personnel Ltd and all trading subsidiaries (Extra Aviation, ep professional and Extra Drivers) and Extra Automotive Ltd.

“Staff/Employees means all individuals employed by Jobandtalent (formerly The Staffing Group).

“Workers” means all workers engaged by Single Resource and Extra Personnel as detailed in their Terms of Engagement.

“Labour User (LU)” means the labour user client where Staff/Flexi-Workers are engaged.

Policy Statement

The Company including Single Resource, Extra Personnel, Extra Automotive and t/a ep professional commits to developing and adopting a proactive approach to tackling hidden labour exploitation.

Hidden labour exploitation is exploitation of job applicants or 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.

Scope

All Staff/Flexi-Workers at all levels within the Company.

Responsibility

It is the responsibility of the Quality and Compliance Manager to ensure this policy is distributed and reviewed

It is the responsibility of all Senior Managers/Directors within the business to ensure the main aspects of this policy is adhered to and staff have the knowledge and tools to achieve compliance.

It is the responsibility of all members of the business responsible for the recruitment and management of all Flexi-Workers to ensure that the details of this policy is adopted and to support all Flexi-workers and report any identified issues to the Quality and Compliance Department immediately

Policy Commitments

The Company shall:

1. Designate appropriate key 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 aware of issues around third party labour exploitation and signs to look for and have signed appropriate Compliance Principles.
4. Ensure that labour sourcing, recruitment and worker placement processes are under the control of trusted and competent staff members.

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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, worker leaflets, induction and worker interviews.
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 Flexi-Workers to report such exploitation which may be occurring within their communities through workplace posters and information included in induction along with a confidential Flexi-Worker Helpline.
9. Require labour providers and other organisations in the labour supply chain to adopt policies and procedures consistent with the above.

Issue No	1	2	3	4					
Effective Date	26/01/15	08/12/15	06/01/17	10/06/21					
Approved By	Jeremy McGrail	Jeremy McGrail	Jeremy McGrail	Nick Gregory-Jones					
Job Title	Managing Director	Managing Director	Managing Director	Managing Director					