

# Preventing Modern Slavery & Labour Exploitation Policy

## 1. Policy Statement

- 1.1. This policy outlines Pro-Force's commitment to ensuring our supply chain, business and all areas of operations are free from modern slavery and labour exploitation. We are committed to developing and implementing a positive and proactive approach to tackling the exploitation of workers within our supply chain.
- 1.2. As a leading recruiter to the fresh produce sectors, we recognise the vital role we play, at the front line of the recruitment process, in ensuring our workers are free from the threat of forced labour, labour exploitation and other forms of modern slavery.
- 1.3. This policy is to be read in connection with Pro-Force's Modern Slavery Statement.

## 2. Scope of the policy

- 2.1. This policy is applicable to all Pro-Force branches, sites and locations across the UK, any Company that falls into the Pro-Force Group, and to all staff members including directors, senior managers, managers, officers, employees and volunteers (collectively referred to as staff in this policy).
- 2.2. This policy does not form part of the contract of employment for employees, and as such, Pro-Force reserves the right to amend the policy at any time.

## 3. Responsibility for implementation of the policy

- 3.1. The Managing Director and the Senior Management Team have overall responsibility for the implementation of this policy.
- 3.2. The Compliance department is responsible for monitoring and reviewing the operation of this policy and making recommendations for changes to minimise risk to operations.
- 3.3. Line managers and supervisors are required to familiarise themselves with, and understand this policy, its operation, and any related procedures. Compliance will provide training documentation and guidance on the provisions of this policy, as is relevant to their responsibilities.
- 3.4. Questions related to the use, understanding or direction of this policy should be directed to the Compliance department.

## 4. Our Commitment

### 4.1. We shall:

- Designate appropriate staff (with suitable experience and expertise) to complete suitable modern slavery and labour exploitation training, and take full responsibility for the development and implementation of procedures to recognise and prevent modern slavery within our business and supply chain
- Continue and develop our positive relationships with all relevant authorities such as the Gangmaster's and Labour Abuse Authority and the police, ensuring that suspicions of modern slavery are appropriately reported, and any resultant investigation work is completed effectively
- Understand and accept that fees for finding work are a cost to be undertaken by ourselves and our clients, and not the worker.
- Development and implementation of a company wide training programme to ensure that all staff are equipped with the skills and knowledge required to carry out their roles safely, minimising the risks of modern slavery and exploitation
- Ensure that all staff with a responsibility for the recruitment and management of the workforce are fully trained on recognising the signs of labour exploitation and modern slavery, and understand the escalation procedures and how to prioritise the safety of the worker.
- Ensure that any and all sourcing, recruitment, placement and procedures are under the control of trained, competent staff, which are regularly assessed and supported via effective mentoring and management.
- Provide full information to our workforce on modern slavery and labour exploitation, via induction, ongoing worker interviews, toolbox talks and written information such as posters, handbooks and any other suitable means
- Encourage and support victims of modern slavery and exploitation to come forward by means of a range of confidential communications channels, such as our third party helpline, established complaints procedures and online emergency contact area
- Ensure confidentiality, sensitivity and prioritisation of worker safety and welfare at all stages of any report, escalation or investigation
- Ensure that all staff understand the requirements of their role and position as an employee of Pro-Force, and that any instance of breach of this Policy or related policies, procedures or statements is considered a gross misconduct offence and may result in disciplinary action, up to and including summary dismissal.

## 5. Our Procedures

- 5.1. Through effective training we will ensure that all staff have the skills and knowledge they require to complete their roles safely and effectively.
- All staff are required to complete basic awareness training on modern slavery and labour exploitation as part of their induction into the business
  - All recruitment staff are required to complete safe recruitment training
  - All supervisory staff are required to complete awareness training on exploitation, forced labour and hidden third party exploitation
  - All management are required to complete training on investigating and escalating reported issues
- 5.2. All training is reviewed and refreshed on an annual, or as is required, basis.
- 5.3. All staff are required to commit in writing to our Ethical Principles confirming their understanding and awareness of all procedures to mitigate the risks of modern slavery and exploitation within the business.
- 5.4. Workers are regularly interviewed and complete surveys to give them the opportunity to come forward or discuss any concerns they may have.
- 5.5. Any and all suppliers or any labour user is required to be audited prior to the commencement of supply (as per our Ethical Supply Chain Policy) prior to commencing services or supply.
- 5.6. All policies and procedures in relation to modern slavery prevention are written and developed by the Senior Management team who take full ownership of implementation throughout all levels of the business to ensure success.

## 6. Policy Review

- 6.1. The Compliance department is responsible for reviewing this policy annually, or as is required, to ensure that it meets legal standards and reflects best practice.

September 2019

Name MATTHEW JARRETT

Signed 