



Prevention of Hidden Labour Exploitation Policy

BARFOOTS

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Prevention of Hidden Labour Exploitation Policy

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1. Policy Statement

Barfoots 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 the Gangmasters Labour Abuse Authority (GLAA) 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, colleagues 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.

2. Purpose

The purpose of this policy is to provide clarity to all line managers, colleagues, staff, agency workers and agency labour providers on the Company's standards, processes and actions that it commits to take in order to protect workers from the threat of labour exploitation.

3. Responsibilities

The Head of HR and members of the HR Team are responsible for the deployment of this policy and accompanying procedures to line managers, colleagues, staff, agency workers and agency labour providers.

The Head of HR is responsible for liaising with relevant agencies to investigate and resolve any alleged cases of potential labour exploitation involving the Company. This includes the management of "SeeHearSpeakUp", the Company's confidential whistle blowing service and the internal audit of HR processes to assess operational compliance.

4. Our Policy Commitments

- 4.1 The HR team will be provided with the necessary training, including training approved by the Gangmasters Licensing Authority (GLAA), to ensure the appropriate level of competence
- 4.2 All recruiting managers will be briefed on the Company's policy and procedures and will confirm their understanding by signing the "Recruiter Compliance Principles" form.
- 4.3 All recruitment, agency sourcing and training placement processes will be managed by competent staff members.
- 4.4 Job applicants will not be charged fees for work of any kind, whether temporary or permanent
- 4.5 To manage any complaints of hidden labour exploitation, including "cash for jobs", in accordance with the Company's Disciplinary policy and to work with the Police and the GLAA in dealing with such complaints including providing access to documents and facilities that may be relevant in pursuing a criminal prosecution.

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- 4.6 To work proactively with employee consultative bodies where relevant to educate and raise the awareness of colleagues and workers, through a range of communication channels, of the importance of reporting suspected cases of hidden labour exploitation and how to report concerns.
- 4.7 To provide a confidential whistle blowing service, “SeeHearSpeakUp”, so that workers can raise concerns without fear.
- 4.8 To only trade with providers of temporary agency and permanent workers that have policies and procedures in place that are consistent with the Company’s policy on the Prevention of Hidden Labour Exploitation.

5. Protocols

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

- 5.1 All complaints of hidden labour exploitation must be reported to the Head of HR before any steps are taken to investigate the matter. Investigations will be conducted by an appropriately trained Company representative after consultation with a GLAA Officer.
- 5.2 After consultation with a GLAA Officer, the Head of HR will arrange a case review with appropriate team members and the GLAA Officer (if deemed necessary).
- 5.3 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.
- 5.4 The Company will use interpreters either nominated by the complainant and / or victim, or supplied by an independent, external company.
- 5.5 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 Head of HR will report the case to the Police.
- 5.6 As part of the investigation process the “Record of Potential Third Party Exploitation Questionnaire” must be completed and supplemented with comprehensive meeting notes.
- 5.7 Investigating Officers will utilise guidance from Stronger Together (www.stronger2gether.org) with regards to minimum standards of questions to be asked.
- 5.8 Where the GLAA request attendance at a meeting, this will be permitted only with the express consent of the complainant and / or victim.
- 5.9 Detailed notes of case meetings will be maintained throughout the process in order to assist the Police and GLAA in the event of a criminal prosecution.
- 5.10 The Head of HR will ensure that a regular report of cases is submitted to the Group Chief Financial Officer and Group Chief Executive Officer

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