



# Preventing Hidden Labour Exploitation Policy

## POLICY STATEMENT

Swann Recruitment Ltd 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.

## Policy Commitments

Swann Recruitment Ltd shall:

1. Designate appropriate 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. Swann Recruitment Ltd 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 Labour Abuse Authority and Police if Modern Slavery is suspected.
6. Provide information on tackling "Hidden Labour Exploitation" to our workforce through workplace posters, worker leaflets, induction, etc.
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 workers to report such exploitation which may be occurring within their communities and inform the best ways how to do report any case.
9. Require labour providers and other organisations in the labour supply chain to adopt policies and procedures consistent with the above.
10. To monitor risks and potential supply via schemes such as "Family and Friends" schemes.

'Preventing Hidden Labour Exploitation Policy' applies to all sites.

Date 12 May 2022