



## Steve Ball Recruitment - Preventing Hidden Labour Exploitation

### Policy Statement

Steve Ball 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.

### Scope

This policy applies to all locations of Steve Ball Recruitment Ltd.

### Responsibility

Branches will take responsibility for ensuring this policy is held in each branch process. However, HR will have overall responsibility for the policy and ensuring it is updated and upheld throughout the business. Branch Managers should take responsibility for ensure the policy is followed, and also the Consultants to implement it into their approach. Training and will be developed and implemented by HR for all staff. This policy will be reviewed annually or more often as and when necessary.

### Policy Commitments

Steve Ball Recruitment shall:

1. Designate the Resourcing and Development manager to train consultants / managers on “Tackling Hidden Labour Exploitation” and to have responsibility along with HR for developing and operating company procedures relevant to this issue.
2. Accept that job finding fees are a business cost, (paid by clients) 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.
4. Ensure that labour sourcing, recruitment and worker placement processes are under the control of trusted and competent employees.
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 and others through training, the S drive and induction processes along with visible posters in the workplace displaying helplines.
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. Provide posters will helpline numbers
9. Require labour providers and other organisations in the labour supply chain to adopt policies and procedures consistent with the above.



## **Policy Implementation**

- a) All staff receive Stronger Together training as part of the Employee Induction 2-day training course within their first month of employment
- b) Training record is held on the Employee Personal Development Plan saved in personnel files
- c) There will be 4 key representatives in the company at all times who are qualified Stronger Together Train the Trainers and have attended ALP training within the last 2 years