



Policy on Preventing Hidden Labour Exploitation

POLICY STATEMENT

Inplace Personnel Services Limited commits to developing and adopting a proactive approach to tackling hidden labour exploitation.

Hidden labour exploitation is exploitation of job applicants and 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.

Coverage

All Inplace Offices and Onsite Locations

Responsibility

George Paterson, Operations Director has overall responsibility for this policy.

Claire Long, Managing Director & Andrew Wood Business Manager have specific responsibilities for various aspects of this policy.

Policy Commitments

Inplace Personnel Services Limited shall:

1. Designate appropriate managers (Claire Long, Managing Director & Andrew Wood Business Manager) 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 trained to be 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.
5. Adopt a proactive approach to reporting suspicions of hidden worker exploitation to the Gangmasters Labour & Abuse Authority and police.
6. Provide information on tackling “Hidden Labour Exploitation” to our workforce through:
 - i. Office Wall Posters
 - ii. Exploitation reading literature on desks in reception areas
 - iii. Temporary Workers Registration Documents – Exploitation Questionnaires
 - iv. Information given to Temporary Workers after initial registrations – Contact Information, General Inplace Information, Exploitation information, how to report exploitation.
 - v. Confidential Questionnaires
 - vi. Induction Training
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.
 - i. Emergency – Call the Police 999
 - ii. Non-Emergency – Call the Police 101
 - iii. Gangmasters Labour & Abuse Authority (GLAA) – 0800 432 0804
 - iv. Gangmasters Labour & Abuse Authority (GLAA) – email intelligence@gla.gsi.gov.uk
 - v. The Modern Slavery Helpline – 0800 0121 700

vi. Migrant Help – 07766
668781

9. Require labour providers and other organisations in the labour supply chain to adopt policies and procedures consistent with the above.

Name: Mr George S Paterson - FIRP

Position: Operations Director

Contact: 01623 274005

Date: 01.10.2018

