

Policy on Preventing Hidden Labour Exploitation

ELT/SLT responsibility:	Executive Director of Human Resources, Organisation Development & Marketing		
Applies to:	<ul style="list-style-type: none"> ● All RNN Group Employees ● All RES Employees and Workers ● National Fluid Power Centre Employees ● All Sub-Contractors ● Volunteers ● Student Teachers ● Contractors ● Work Experience 		
Approved by:	● Equality Impact Assessment	Approval date:	28 March 2022
Approved by:	● Joint Consultative and Negotiating Committee	Approval date:	6 April 2022
Approved by:	● Executive Leadership Team	Approval date:	10 July 2023
Approved by:	● RNN Group Board	Approval date:	10 July 2023
Related documents:	<ul style="list-style-type: none"> ● Anti-slavery and Human Trafficking Statement ● Recruitment & Selection Policy 		
Implementation date:	1 st August 2023	Review date:	August 2026
DOCUMENT CONTROL			
Date	Version	Action	Summary of changes
1 November 2017	1.0	Policy first implemented	N/A
1 April 2022	1.1	Policy reviewed	Review in line with national guidance, minor changes.
1 August 2023	1.2	Policy reviewed	Review in line with national guidance, no changes.
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1. Scope and Purpose

RNN Group commits to developing and adopting a proactive approach to prevent, respond to and remediate the risks of modern slavery, forced and debt-bonded labour, human trafficking and hidden exploitation within its workplaces.

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 themselves as such, and a reluctance to come forward.

Modern slavery is a broad term used to encompass offences that involve one person depriving another person of their liberty, in order to exploit them for personal or commercial gain.

Forced labour is all work or service that is exacted from any person under the menace of any penalty and for which the said person has not offered themselves voluntarily.

Debt-bonded labour is where a person's labour is demanded as a means of repayment for a loan or service.

Human trafficking is the recruitment and transportation of persons by threat, force, coercion or other abuse of power or vulnerability to achieve the consent of a person having control over another person for the purpose of exploitation.

Hidden labour exploitation is action up to and including modern slavery which involves the exploitation of workers and job applicants by internal or external individuals without the sanction or explicit knowledge of the employer or labour provider.

2. Responsibility

The Chief Executive has overall responsibility for this policy.

The Executive Director of HR & Marketing has responsibility to ensure the organisation's HR processes and systems are compliant with this policy and any areas of concern are investigated immediately.

The Executive Director of Finance has responsibility to ensure the organisation's payroll and Finance processes and systems are compliant with this policy and any areas of concern are investigated immediately.

3. Policy Commitments

The Group shall:

1. Designate appropriate employees 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 organisation will not use any individual or organisation to source and supply workers without confirming that workers are not being charged a work finding fee. It shall also ensure that any job finding fees are paid directly to the business through proper invoicing and payment systems.
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. In accordance with our Recruitment &

Selection Policy, all recruitment and selection processes will be undertaken and agreed by individuals who have received Safer Recruitment and Safeguarding Training and that this is revisited regularly.

5. Adopt a proactive approach to reporting suspicions of hidden worker exploitation to the Gangmasters Licensing Authority and police.
6. Identified or suspected victims of Modern Slavery or Human Trafficking will be dealt with fairly, safely and with respect and understanding at all times. The welfare of the individual/s will be a priority and full cooperation with the Gangmasters Licencing Authority and/or Police will be provided.
7. Provide information on tackling "Hidden Labour Exploitation" to our workforce through promotional materials and awareness training.
8. Encourage workers to report cases of hidden third-party labour exploitation, provide the means to do so and investigate and act on reports appropriately.
9. Ensure all employees and workers, whom are carrying out a service with the RNN Group have a formal statement of particulars (or other such terminology used) which outlines the basics of (but is not limited to); their role, pay, rights and responsibilities, statutory obligations for both parties, duration and termination options.
10. Positively encourage and support employees and agency workers to report such exploitation which may be occurring within their communities by discussing with the organisations HR department / safeguarding department or by contacting the Gangmasters Licencing Authority or police directly.
11. Ensure the Designated Safeguarding Officers within the Group are aware of national and local issues and address these with the wider workforce if appropriate.
12. Require labour providers and other organisations in the labour supply chain to adopt policies and procedures consistent with the above.
13. Respond effectively to potential indicators of modern slavery to safeguard and provide appropriate support to victims (see Appendix A for the Response Plan Procedure).

Appendix A – Response Plan

Purpose of procedure

This procedure defines business practices to report any suspicion of/or modern slavery exploitation (i.e. forced and bonded labour and human trafficking).

Coverage

This policy applies to RNN Group.

Responsibility

Executive Director of HR & Marketing is responsible for implementing and overseeing the procedure.

Creating awareness - reporting modern slavery

- Awareness on modern slavery exploitation (what it is and how it can be reported) will form part of induction training via online training which is accessible by all employees and workers
- This procedure will be visibly displayed at the place of work via the external website and internal intranet systems and ensure that all workers will have access to these.

Workers: reporting suspicion of/or modern slavery abuse

- Workers can report suspicion of/or modern slavery to:
 - The HR Department or Safeguarding Officers who will then inform management
 - College Management Team or Senior Leadership Team
 - Anonymously by sending written correspondence to the HR Department or Designated Safeguarding Officers
 - Authorities: Police - 101 or 999 (depending on urgency) or Gangmasters and Labour Abuse Authority - 0800 432 0804
- Workers being exposed to modern slavery can find help and support from: The Salvation Army - 08000 RESCU (73728) or Modern Slavery Helpline - 08000 121 700

Management: addressing modern slavery abuses

- Management shall address any suspicion of/or modern slavery with the necessary urgency and sensitivity to the worker involved
- Management shall immediately report suspicion of/or modern slavery to the relevant authorities: Police 101 or 999 (depending on urgency) or Gangmasters and Labour Abuse Authority - 0800 432 0804

Protecting the victim

- Where criminal exploitation is believed to be involved and/or the worker is in real and immediate danger, notification must be made to the enforcement agency and/or relevant victim support organisation and initial protection provided by the employer for the victim until law enforcement and support arrive i.e.:
 - Remain with the potential victim in a safe area (such as the office)
 - Do not draw attention to the fact that s/he has sought assistance, for example, do not keep the potential victim in view of those who have exposed the potential victim to modern slavery abuses
 - Where there is more than one potential victim it is advisable to put them in separate rooms. It may not be possible to know who is being exploited and who is an exploiter
 - Reassure potential victim(s) that their confidentiality will be protected.
- Where the exploitation of one job applicant or worker is discovered, due consideration must be given to the risk of other job applicants or members of the workforce also being in an exploitative situation