

Process	Good Practice	Complete?
Management System	Employer has developed and implemented a “Preventing Hidden Labour Exploitation” HR Policy.	✓
Management System	Employer has consulted with and sought to work collaboratively with trade union and/or employee representatives on a programme to identify, tackle and report hidden labour exploitation.	✓
Management System	Employer manager(s) have attended training in preventing, identifying and reduce the risk of human trafficking and other third party labour exploitation.	✓
Management System	Employer has trained security staff to monitor “Alert Flags” that may indicate potential worker exploitation and to spot and report signs to appropriate managers.	✓
Management System	Employer displays “Stronger Together” posters on site noticeboards.	✓
Management System	Employer includes recognising and reporting human trafficking and other third party hidden labour exploitation in worker induction training.	✓
Management System	Employer issues workers with a “Stronger Together” leaflet which includes recognising and reporting human trafficking and other hidden third party labour exploitation.	✓
Management System	Employer issues workers with GLA worker leaflets (in food and agricultural sectors) – information leaflets / worker handbook.	✓
Management System	Employer issues its supervisors and managers with written notification that accepting inducements or other forms of worker maltreatment, coercion or harassment will be regarded as a gross misconduct offence.	✓
Management System	Employer accepts that the cost of recruitment is a business cost and that no fee for recruitment is charged to workers, directly or indirectly through the required purchase of goods or services. Employer enforces this through its labour supply chain.	✓
Management System	Employer nominates a senior manager with whom and implements arrangements through which the labour provider can deal confidentially with reports of harassment and/or discriminatory, unreasonable or suspicious actions by the employer’s supervisors.	✓
Management System	Initiate a programme of regular audits to check that any safeguards introduced are being adhered to and are consistently applied.	✓
Management System	Where ethical audits conducted by external social compliance auditing bodies raise issues relating to trafficking or exploitation, even where recorded as ‘observation’ these matters are formally investigated.	✓
Management System	Employer takes a lead role in promoting and endorsing the application of the good practice in this Toolkit down through its supply chain.	✓
Recruitment	Employer has discussed and agreed the labour sourcing methods used by its labour provider. Employer is clear about the labour sourcing supply chain.	✓
Recruitment	Employer has discussed and agreed the recruitment selection criteria and a fair and non-discriminatory process used by its labour provider.	✓
Recruitment	Employer has agreed with the labour provider a transparent and non-discriminatory agency worker temporary to permanent selection process which is effectively communicated to workers.	✓
Recruitment	Employer verifies address via a rent book or contract. This also seeks to drive improvement in standards in provision of accommodation.	
Work Allocation	Employer has defined its agency labour selection and ordering process. This should ensure that only nominated and suitably trained individuals have the authority to book	✓

Good Practice Checklist

	agency workers; that the selection of workers to work on a particular shift / overtime is fair, transparent and non-discriminatory. It should rely on the labour user specifying number of skills/roles required and not named individuals. It should avoid situations where workers congregate in the hope of work and employer supervisors pick from a crowd.	
Workplace Monitoring	Employer directs CCTV cameras and Security Officers to areas where workers disembark from transport to work to monitor any potential suspicious activity.	✓
Workplace Monitoring	Security officers should monitor and report on the cars, vans and buses used to deliver and pick up workers to identify controlled or managed transport operations.	✓
Workplace Monitoring	Employer supervisors regularly talk informally to their workers to gently uncover whether there are any workers experiencing issues. They should look at situations such as where one worker is regularly distributing food to others or where individuals have no money to buy food or drink.	✓
Workplace Monitoring	Employer appoints trusted “Worker Welfare Officers” or “Integration Officers” who speak representative languages to gain the trust of fellow workers and come forward with information of workers experiencing difficulties.	
Workplace Monitoring	Employer implements a multi lingual Confidential Helpline run internally by HR or by external providers. This should allow issues to be raised confidentially in the worker’s first language by phone, email or in writing.	✓
Workplace Monitoring	Employers should publicise the contact details for the GLA (http://gla.defra.gov.uk/), and the Pay and Rights helpline to which workers can confidentially complain. Crimestoppers number should also be made available.	✓
Workplace Monitoring	Employer conducts formal re-checking of bank accounts; addresses; personal details etc. when agency workers move from temporary to permanent status.	✓
Workplace Monitoring	Employer conducts regular staff briefings with the topic of trafficking and forced labour on the agenda.	✓
Workplace Monitoring	Employer and trade union and/or employee representatives have hidden labour exploitation as an agenda item during progress meetings and review collaborative informal and formal approaches to identifying, deterring and tackling this issue.	✓
Workplace Monitoring	Employer issues occasional confidential questionnaires to a sample of workers to identify potential worker Exploitation (see Appendix 4). The questions and format should be varied to prevent workers being coached in how to answer the questions. This process should be conducted in a controlled environment to prevent any outside influence.	✓

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Signed 