



Preventing Hidden Labour Exploitation Policy

POLICY STATEMENT

Invicta 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 throughout Invicta Recruitment Ltd, at all Invicta office locations and to all members of staff with responsibility for recruiting and managing workers.

Responsibility

Terry Waite has overall responsibility for the implementation of this policy. Responsibility for the development of Company procedures relevant to this policy rests with Terry Waite and Irena Sereickiene. Alma Singleton-McGuire has appointed to provide initial comfort and emotional support for a worker impacted by a workforce incident, modern slavery or hidden labour exploitation.

Policy Commitments

Invicta Recruitment shall:

1. Designate appropriate managers – Terry Waite and Irena Sereickiene 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 third-party 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 and have signed up to our Recruiter 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 and Labour Abuse Authority and police.
6. Provide information on tackling “Hidden Labour Exploitation” to our workforce through a variety of formats including displaying posters in Invicta Recruitment offices, worker leaflets and through 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 by using our Confidential email service: helpline@Invictarecruitment.com
9. Require other organisations under our control and operating within the Labour supply chain to adopt policies and procedures consistent with the above.

Invicta Recruitment is committed to ongoing continuous improvement and formal annual review of the process for tackling Modern Slavery.

