



ANTI SLAVERY – STATEMENT & POLICY

POLICY STATEMENT

SEP 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.

Coverage

This policy applies to all sites under our control.

Responsibility

Joe Johnson (Managing Director) has overall responsibility for this policy

Sean (Manager) has specific responsibilities for ensuring that prospective SEP employees have of this policy.

Policy Commitments

SEP shall:

1. Designate appropriate managers (*who/job title*) 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 aware of issues around third party labour exploitation and signs to look for and have signed appropriate Compliance Principles (*use Appendix 2 as a template*).
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 Licensing Authority and police.
6. Provide information on tackling "Hidden Labour Exploitation" to our workforce through *(list formats e.g. in a variety of formats such as workplace posters, worker leaflets, induction, other 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 *(detail how)*.

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

Signed

A handwritten signature in blue ink, appearing to read "J. Johnson".

Joe Johnson

Managing Director

Dated 02/03/2017