



MODERN SLAVERY AND PREVENTION OF HIDDEN LABOUR EXPLOITATION

Company Policy

1. POLICY STATEMENT

LJ Fairburn & Son Ltd is committed to developing and adopting a proactive approach to tackling hidden labour exploitation and fundamentally opposes any form of labour exploitation of job applicants, workers or agency workers by any company, individual or group of individuals. The company is committed to acting ethically and with integrity with all business relationships which includes collaborating with the Gangmaster Labour and Abuse Authority, Stronger Together and local authorities to ensure systems are adopted to help eliminate all forms of labour exploitation throughout our supply chain.

Hidden labour exploitation is exploitation of job applicants and workers by third party individuals or gang's other than the employer or labour provider including rogue individuals working within these businesses but without the knowledge of management. This includes forced labour and human trafficking for labour exploitation, payment for work finding services and work-related exploitation such as forced use of accommodation. In essence it constitutes as any act in which by one person/group of people deprives another of their liberty in order to exploit them for personal or commercial gain.

The company recognises that labour exploitation is often well hidden by the perpetrators and victims rarely see themselves as such and are often reluctant to come forward for help.

2. COVERAGE

This policy applies throughout LJ Fairburn & Son Ltd, at all sites and to all employees along with those engaged in work on behalf of LJ Fairburn & Son Ltd.

3. RESPONSIBILITY

Ultimately the responsibility for this policy lies with the Directors of the Company. The daily practical management of the procedure to this policy is the responsibility of the HR Manager.

4. POLICY COMMITMENTS

LJ Fairburn & Son Ltd shall:

- 4.1 Ensure the HR team and relevant managers have a prominent level of understanding the risks in labour exploitation throughout the supply chain which will be developed through training courses provided by relevant organisations such as the GLAA, Stronger Together and the Association of Labour Providers.
- 4.2 All managers responsible for recruiting will be briefed on the Company's Modern Slavery and Prevention of Hidden Labour Exploitation policy and procedures who will confirm their understanding by signing the recruiter compliance principles.
- 4.3 Ensure that all pricing of the Company's produce is managed to warrant that labour costs are budgeted for as by way of accepting that recruitment fees are a business cost and job applicants will not be charged for any type of temporary or permanent work.
- 4.4 Select trusted and competent staff members to control the processes of labour sourcing, recruitment and worker placement.
- 4.5 Adopt a proactive approach to reporting suspicions of hidden worker exploitation to the GLAA and the police. The HR Manager will be the key principle in reporting such suspicions and will be responsible building a report the relevant authorities.
- 4.6 Encourage workers to report cases of hidden third-party labour exploitation through the Company's whistleblowing policy.
- 4.7 Educate and help to raise awareness to all employees, workers and individuals involved with the operations of LJ Fairburn & Son Ltd of hidden labour exploitation and convey the importance of reporting suspected cases through employee inductions, work place posters, leaflets and educational videos.
- 4.8 Take a proactive approach to encouraging workers and agency workers to report any known acts or suspicion of hidden exploitation within their communities and shall facilitate this by providing the relevant information to do so for the GLAA, Modern Slavery Helpline, Migrant Help, The Salvation Army and the police.
- 4.9 Only trade with labour providers whose policies and procedures are in line with LJ Fairburn & Son Ltd's policy on the prevention of Hidden Labour Exploitation.



5. PROCEDURE

- 5.1 All workers and agency workers are asked to provide evidence of their entitlement to work in the UK by presenting their British Passport, National Identity Card of the EEA or Switzerland, a permanent residence card issued by the Home Office, Border and Immigration Agency or UK Border Agency or certified documents issued by the Home Office, Border and Immigration Agency or UK Border Agency stating the named person's eligibility to legally work in the UK, to be photocopied by the HR department. All copies will be stored securely at the Company's head office, in accordance with our obligations under the Data Protection Act, and originals shall be returned immediately to the worker.
- 5.2 Workers, agency workers or contracted workers should report a complaint of labour exploitation to their line manager who would then report this directly to the HR Manager. All complaints of labour exploitation will be treated in the strictest of confidence and the Company shall take all practical steps to protect the individual(s) who have raised the concern. This may include relocating the complainant and/or victim to another LJ Fairburn site to ensure they still have the ability to maintain an income.
- 5.3 The HR Manager will investigate the concern raised and will consult with the GLAA on the correct protocol to follow.
- 5.4 Where there is concern for the victim's wellbeing and safety, the HR Manager will report the case to the Police.
- 5.5 The Company shall facilitate meetings with the complainant/victim, GLAA and the Police. During these meetings that Company shall take all practical steps necessary to minimise the risk to the Victim and/or complainant.
- 5.6 When necessary the Company will request the use of an interpreter.
- 5.7 Throughout the process the HR Manager shall keep detailed accounts of the complaint, person(s) involved and meetings in order to assist the GLAA and the police.
- 5.8 The HR Manger will conduct annual and facilities external audits of internal practices and those of labour providers supplying workers to the Company to ensure compliance with this policy and procedure. (please refer to Management of Labour providers for non-compliance and licence revocation).

6. MITIGATING THE RISK

- 6.1 Workers and agency workers shall be notified that no payment is required to work for the Company, this includes any payment to Company employees, or any third party individuals or groups claiming to offer work in receipt of payment on behalf of the Company.
- 6.2 Workers are requested to inform the HR Manager of any such requests of payment or previous payment made in order to obtain work at the Company or in The UK.
- 6.3 No subsistence loans are given to any worker.
- 6.4 No deductions are taken from Company worker's pay other than for PAYE, NI, Automatic Enrolment Pension contributions, salary sacrifice schemes, or for legitimate debts owed to the Company, as detailed in the employment contract.
- 6.5 Recruiting staff are to be made aware that labour providers are not to exceed the national minimum wage offset with regards to payment for accommodation and transport costs should be set at a reasonable rate and at the workers own free will.
- 6.6 Recruiting staff are to be made aware that no charges are to be made by workers for the provision of PPE, Insurances or other legitimate business costs.
- 6.7 Workers are to be informed that any deductions other than statutory payments must only be taken after written consent has been supplied by the worker.
- 6.8 All workers must be provided with a contract of employment within 8 weeks of starting work. Some LJ Fairburn and Son Ltd documentation has been translated into languages that workers can understand.
- 6.9 Workers are to be paid for ALL hours worked, at or above the National Living Wage, National Minimum Wage or the appropriate Apprentice wage.
- 6.10 Workers and agency workers must also receive statutory payments for sick, annual, maternity/paternity leave and automatic enrolment pension payments.
- 6.11 Staff responsible for worker hours are to be made aware of the limits outlined by Working Time Regulations (WTR)1998, workers are to only exceed 48 hours per week if they have signed the collective opt out agreement and any breaches of this requirement must only be occasional, not systematic, and comply with regulations 21 and 23 of the WTR 1998.