

360 Recruitment – Preventing Hidden Labour Exploitation

360Rec-25 | 2024-2024

Policy Statement

360 Recruitment Ltd are fully committed to developing and adopting a proactive approach to tackling hidden labour exploitation. Hidden labour exploitation is the 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 of themselves as such, reluctant to come forward.

Coverage

This policy applies to all 360 Recruitment Ltd sites.

Responsibility

Greg Tyler, Director, has overall responsibility for this policy with assistance in maintaining, reviewing and implementing compliance from the Head of Compliance.

All members of the management team including senior consultants, divisional, operation and branch managers have responsibility to ensure their team follow and comply with this policy.

Employees of 360 Recruitment Ltd who fail to follow this policy, may be subject to disciplinary action.

Policy Commitments

360 Recruitment Ltd shall:

- Designate appropriate individual(s) to attend “Tackling Modern Slavery in UK Businesses and Supply Chains” training and to have responsibility for developing and operating company procedures relevant to this issue.
- Accept that job finding fees are a business cost and will not allow these to be paid by job applicants. 360 Recruitment Ltd will not use any individual or organisation to source and supply workers without confirming that workers are not being charged a work finding fee.
- 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 (outlined below).
- Ensure that labour sourcing, recruitment and worker placement processes are under the control of trusted and competent staff members.
- Adopt a proactive approach to reporting suspicions of hidden worker exploitation to the Gangmasters and Labour Abuse Authority (GLAA) and police.
- Provide information on tackling “Hidden Labour Exploitation” to our workforce through clearly visible means such as posters, leaflets and any other relevant literature.
- Encourage workers to report cases of hidden third-party labour exploitation, provide the means to do so and investigate and act on reports appropriately.

- Positively encourage and support employees and agency workers to report such exploitation which may be occurring within their communities, to a member of our senior management team. We will investigate internally or if this is not appropriate, work with organisations such as GLAA , the Police or Modern Slavery helpline.
- Require labour providers and other organisations in the labour supply chain to adopt policies and procedures consistent with the above.

Recruiter Compliance Principles

360 Recruitment Ltd requires all recruiters to:

- Only interview applicants in approved locations.
- Not allow job applicants to complete registration documents on behalf of others.
- Not accept money, favours or any gifts at all from job applicants or workers.
- Not loan any personal money to temporary workers.
- Notify a manager when informed by a job applicant or worker that they have paid money to be introduced to the company.
- Not allow unauthorised agents or individuals to introduce job applicants to 360 Recruitment Ltd including friends, family or “local contacts” to source workers to satisfy urgent demand.
- Notify a manager when suspecting an individual of introducing job applicants to 360 Recruitment Ltd for personal gain
- Not act as a landlord or be involved in the provision of accommodation, transport or other paid for services to workers.
- Not allow anyone other than a person authorised by management to choose which workers are selected for work shifts.
- Not force or coerce workers/employees to work against their will.
- Not threaten or subject workers /employees to physical or mental mistreatment.
- Treat applicants, workers and employees with dignity and respect.
- Raise any knowledge or suspicions of illegal or dubious activities regarding agents, temporary workers or colleagues to a manager immediately.