



Worker Welfare, Exploitation and Modern Slavery Response Plan

Response Plan

This procedure defines business practices to respond to any situation where worker welfare, worker exploitation or Modern slavery may be suspected or confirmed.

This document applies to all employees, agency workers, contractors and visitors to any Company owned facility.

This document is also provided to our supply chain is provided to our supply chain as part of our procurement business Terms and Conditions and forms an integral part of our **technical governance pack**.

Responsibility

This response plan is the responsibility of all employees, contractors, agency workers and visitors as it forms part of our legal duties under the health and safety at work act 1974.

This act clearly states **the company** are responsible for the health, safety and WELFARE of employees and visitors.

The **Human Resources** department are responsible for implementing and overseeing the procedure



Protect

The first responsibility of this procedure is to Protect and cause no harm.



The UN Guiding Principles require organisations to protect human rights, have effective policies, and ensure that appropriate steps are in place to prevent, investigate and focus on Human Rights.

Several protection procedures are established and maintained by the business which include;



The Board leadership commit to stakeholder protection

Managers are Trained in ensuring the;



- Protection of victims
- Protection of individuals
- Protection of the investigation
- Protection of the brand
- Protection of the supply chain

The organisation is committed to the six key principles of safeguarding and will always;

Empowerment - adults should receive support that's personal to them, chosen by them and has their consent.

Prevention – action should always be taken before any harm to the adult occurs.

Proportionality – responses should be non-intrusive to the adult and proportionate to the risks presented.

Protection – there should be adequate support and representation for those in greatest need.

Partnership – services within the community should work to prevent, detect and report abuse and neglect.

Accountability – safeguarding should be delivered transparently and with accountability.

Prevent



Prevention of issues that may affect worker welfare is the most efficient and effective methodology to adopt.



The UN Guiding principles under the Respect pillar requires organisations to implement processes to identify Human Rights issues, and have supporting processes for addressing them. Furthermore organizations are required to undertake an ongoing programme of human rights due diligence to prevent abuses.



The most effective way to Prevent is to understand Risk and how it affects your processes.

Risk assessments have been completed for the organization and its supply chain. Focus areas have been identified for the resources available.



These risk areas are further managed through due diligence processes that audit and monitor the organization and the supply chain.



Internal management structures are established to facilitate industry collaboration to understand the ever-changing risks.

General Training is provided to enable the organisation to;



- raise awareness of worker welfare issues
- provide tools to identify signs of worker welfare issues
- basic reporting structures to manage immediate concerns



Other awareness raising and prevention materials are provided such as;

- Confidential 3rd party phone line
- Posters
- Worker rights information
- Worker committee
- Grievance procedures

Prepare



While the board of directors adopts a governance role, the responsibility for the management of this procedure is delegated to specific roles who have responsibilities to mitigate the identified health, safety and WELFARE risks.



Targeted training is provided to the relevant personnel and departments to support the risk mitigation process.



Standard operating procedures (SOP) are established to ensure any escalation of risks is managed in a suitable manner to ensure worker welfare is protected.

This document forms part of the system of SOPs.



System testing is completed to ensure the processes are 'fit for purpose' to provide maximum protection when required.

External procedures for managing relationships ;



Working with authorities



Working with NGOs

An understanding of what remedy is and how remedy would be fulfilled by the organisation to ensure boundaries are established is available.



Two relevant definitions of remedy adopted;

- something that corrects or counteracts
- the legal means to recover a right or to prevent or obtain redress for a wrong

provision of suitable mechanisms are available so that every situation can achieve some form of remedy.



All preparation work is evaluated against the protect responsibilities of the organisation.

Pursue



You are NOT the police and your first duty is to protect ALL stakeholders including yourself.

If there is a risk of immediate harm **call 999**.



Call 999

If internal escalation cannot be achieved safely then it must NOT be escalated at all.

Given it is safe to do so, and as a final check before any escalation or investigation is undertaken;

	<p>Are you satisfied 'Hierarchy of risk control' is understood?</p>
	<p>Are you satisfied that investigation boundaries are understood?</p>
	<p>Are you satisfied suitable management structure is in place to understand and manage the consequences of your actions?</p>
	<p>Are you satisfied you know who to contact and when?</p>
	<p>Are you satisfied you have a process in place to manage changing risks?</p>
	<p>Are you familiar with the escalation procedure below?</p>



If the answer is no to any of the questions listed above, please remedy before case escalation is handled internally.

Internal Reporting of Worker Welfare Issues

Any employee, agency worker, contractor or visitor can report any suspicions of, or confirmed worker welfare issues in the first instance to:

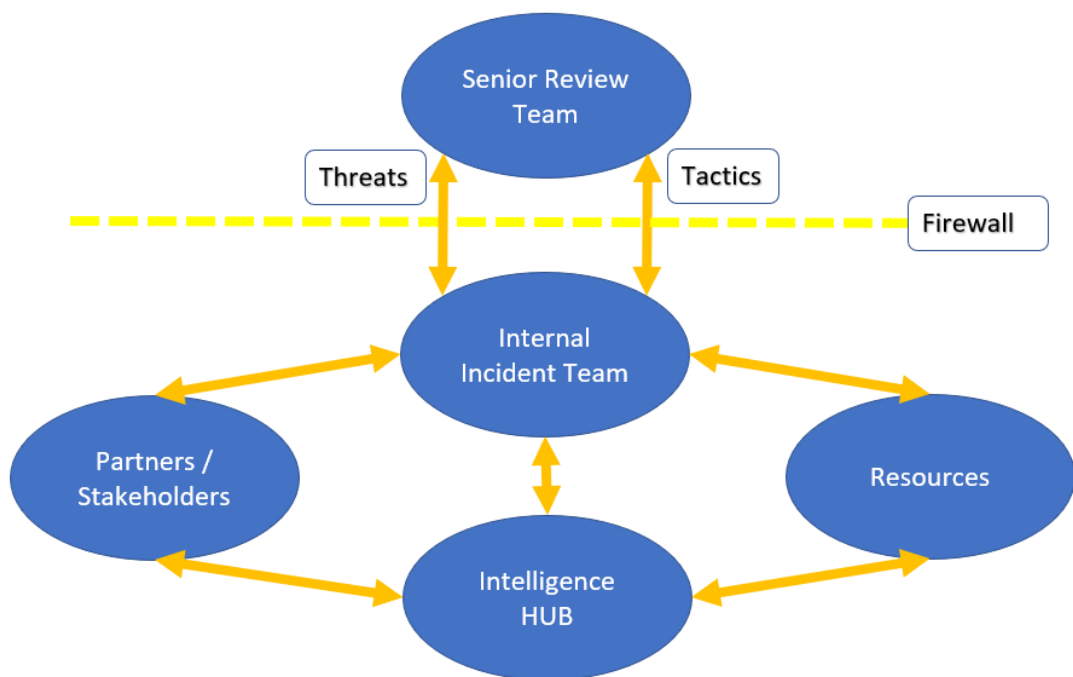


- Their line manager/general manager
- Any Human Resources employee
- Union or Worker Representative
- Human Rights Champions
- Anonymously by putting a written note in suggestion/confidential letterboxes
- Through internal Whistleblowing procedures

Management will address any suspicion of or confirmed worker welfare issue with the necessary urgency and sensitivity to the work involved. This must be completed in line with pre-requisite escalation criteria being met.

An established framework is in place to manage and escalate potential situations safely and effectively.

Managers are trained and responsibilities are defined.



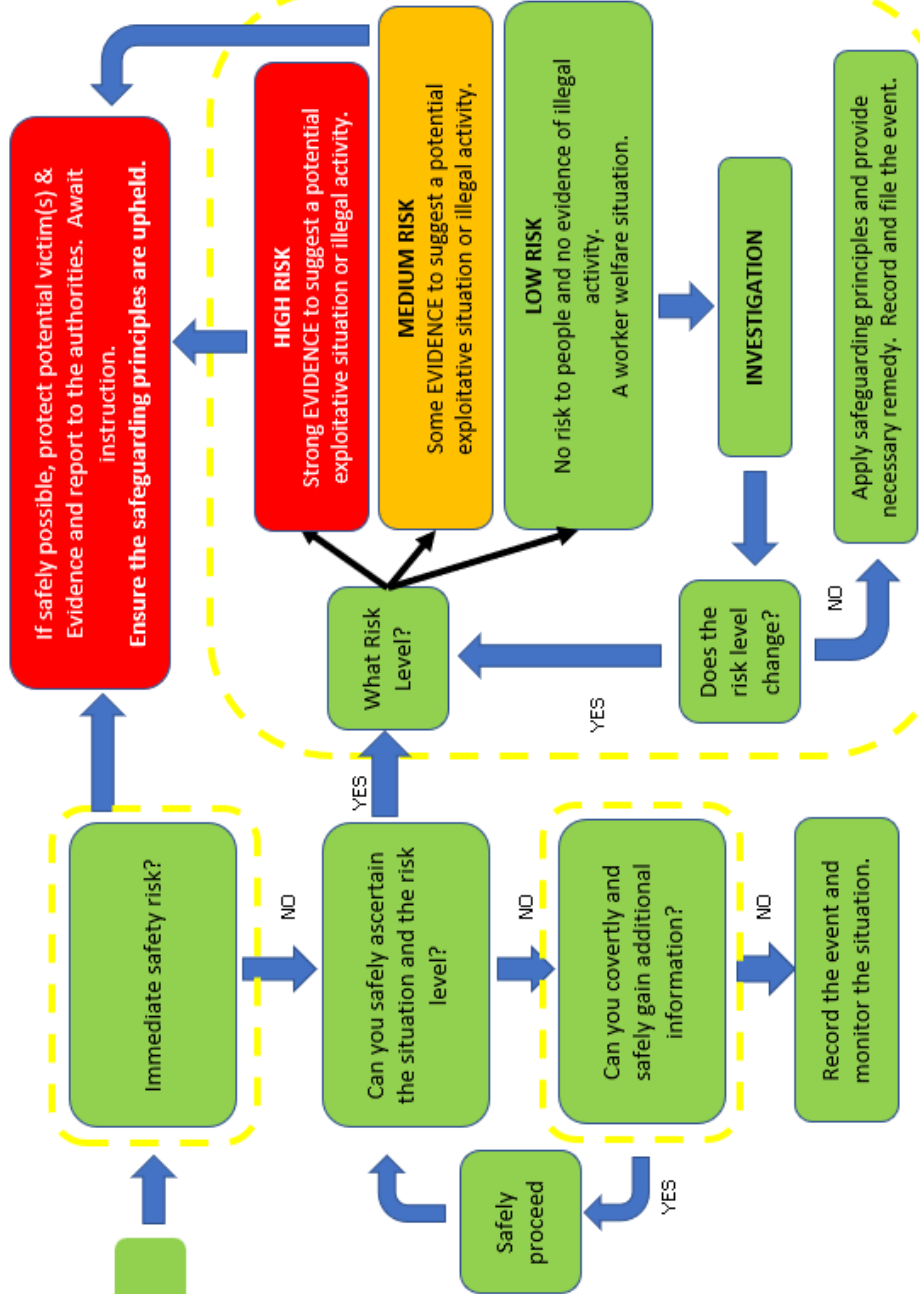
The framework, safely escalates and includes suitable safeguards to ensure information received from the intelligence source is;

- Suitably escalated to the incident team
- Assigned adequate resources
- Suitable communication pathways to inform relevant partners and stakeholders

The framework includes protective firewalls to ensure the 6 principles of safeguarding are upheld.

HANDLING POTENTIAL EXPLOITATION CASES

If a yellow hatched box is crossed please refer to the yellow "Important information box". Use the Worker Welfare, Exploitation and Modern Slavery Response plan. **Comply with Safeguarding principles at all times.**



Important information.
It is essential that any actions you take do not place you, your employees, the potential victim or the evidence at risk. If the potential situation is immediate and serious, you MUST not tackle yourself or allow any members of your team to tackle the issue. Instead you should report to the authorities and await instruction. Any investigation / data collection when trying to understand a situation MUST be done without risk to you, your staff, the potential victim or the evidence. The potential exploiters could be an organised criminal gang and people safety is paramount. The 'Yellow dash' boxes are designed to be an essential 'internal' reporting tool, so that potential situations can be escalated correctly. The firewall is not there to determine if an action COULD be taken, it is there for the purpose of determining SHOULD the action be taken. The firewall's job is create the structure that protects the victim, staff and evidence. Sometimes taking no direct action is the safest process and this MUST be respected.

Step 1 – Assess the Risk



When a suspicion of a Worker Welfare incident is raised, a discussion with the internal incident team will take place to assess the risk level to the potential victim.

If the worker is believed to be involved and/or in real and immediate danger go straight to **Step 5**.
If they are not in immediate danger, continue to **Step 2**.

Step 2 – Establish criminality



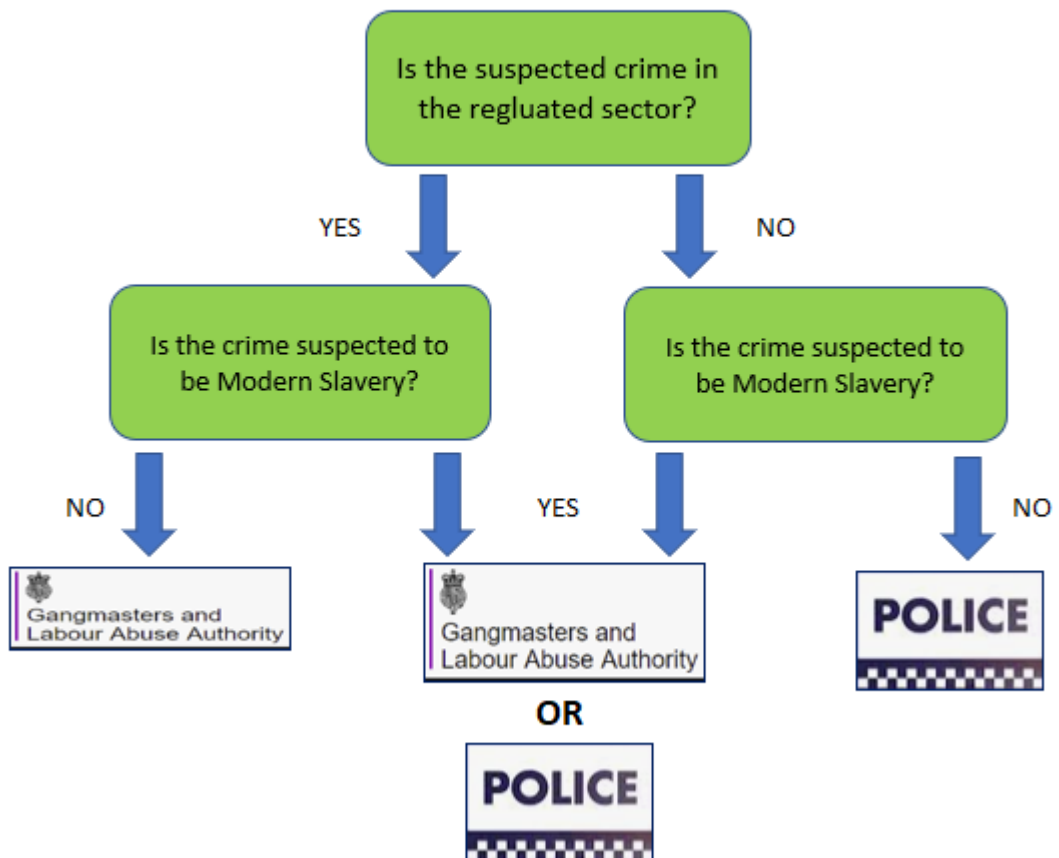
If the likelihood of criminal activity is known or suspected.

Report to authorities.



Which authority?

Worker Welfare Authority Escalation.



Useful contact Numbers

- Local Regional GLAA officer – see Appendix
- Gangmasters & Labour Abuse Authority – 0800 432 0804

TIP Key words to use in any suspected case:



Stress to the operator that the alleged victim is '**Vulnerable**' and '**At risk of further harm**'

Inform the operator that you have a '**Potential victim of Human Trafficking**'



Once reported to the authorities await instruction.

In cases where the GLAA are involved – invoke **Retailer Protocol 2013** as soon as possible to protect stakeholders.

In cases where the Police are involved can be variable in instructions given. Gain Specific Point of Contact quickly.

If the situation does not need to be escalated to the authorities **go to step 3.**

Step 3 – Observation & Investigation.

Establish;



- Who is involved in the investigation.
- Define the terms of the investigation and establish clear 'stop and escalate' boundaries.
- Define clear de-escalate boundaries and always comply with CHIS guidance.

Gather more information about the potential case of Modern Slavery through:



- Observation (e.g., are people leaving site together)
- Unobtrusive checks
- Data collection (Personal details, bank details checks)
- CCTV checks

Step 4 – Worker Welfare Chats.



Once more information has been gathered and there is still believed to be a suspected issue, discussions with workers may be conducted if safe to do so.

Please reference the guide below.

DO'S!	DON'TS!
<p><u>Use the PEACE model</u></p> <ul style="list-style-type: none"> Prepare Engage Account Closure Evaluation <p><u>Make the workers feel at ease</u></p> <p>Smile, welcome them, explain why you are speaking to them – to make sure they are okay and there are no issues</p> <p><u>Ask open questions</u></p> <p>Use the TED model: Tell me... Explain to me... Describe to me...</p> <p><u>Build rapport with workers</u></p> <p>It is unlikely someone will disclose anything the first time they meet you, start to build a relationship and help them to understand you are there to help <i>if</i> they have any issues in the future</p> <p><u>Have a 'chat' rather than an interview</u></p> <p>By turning it into a chat, puts the interviewer at ease as well as the interviewee and makes them far more comfortable</p> <p><u>Have a genuine interest in the person and their welfare</u></p> <p>You need to be careful who you put in front of the workers as they will sense if you genuinely care or are doing it because you must. If they sense you genuinely care they are more likely to talk</p>	<p><u>Read questions from a sheet</u></p> <p>If you forget a question, just ask the next group – in the report you don't need to write how many people you asked and how many answered it – just write '3 people spoke about.....'</p> <p><u>Write down the answers</u></p> <p>If you are having a genuine conversation with someone you shouldn't forget answers, especially if it is something alarming., and if it's not – it won't matter anyway.</p> <p><u>Go into it with the intention to get answers</u></p> <p>If you have heard rumours about payment for work, ask questions about this but don't push for answers, if they indicate no issues then leave it there</p> <p><u>Ask every question about every topic</u></p> <p>You don't need to do a full interview on every occasion, turn it into a chat and ask a couple of questions about payment for work, living conditions etc.</p> <p><u>Call them worker interviews!</u></p> <p>If you get used to calling them 'welfare chats' or welfare discussions' it will help them become less formal and you will get more out of them</p> <p><u>Only use an office environment</u></p> <p>If you see a worker in the car park, ask how they are getting on/how many hours they are doing at the minute etc. Worker welfare chats can take place anywhere and at any time</p>

Remember: If you go into an interview with nothing, and come out with nothing – you've not lost anything and still gained experience

PEACE Model

Plan and Prepare



- Establish what you already know and would like to establish.
- Plan what you are going to ask but more importantly how are you going to ask it.
- Select location and environment carefully for protection and engagement reasons.
- Use of a 'camouflage story' to invite a witness is often a good approach
- If you need to invite an individual, invite a group, or invite a few people for interviews so the potential witness is not singled out
- This is not an interview unless it is a formal investigation.
- If it is a formal investigation for a crime, then you should not be conducting it anyway in line with the case handling procedure.
- What interview rooms are available - or are other places more suitable (canteen, car, machine rooms, outside etc.)?
- How will you record what is said - self noting/note-taker
 - If it is too formal the likelihood of gaining an open account diminishes.
 - Also assume you are successful – how do you gain first account?
 - How do you de-escalate and close the meeting.

Engage



- The first stage of engagement is to forget your objectives and establish theirs.
 - What are their issues and how can you help?
 - Do not force your objectives they will close up.
- If possible use an independent in-person translator, however if necessary but as a last resort a phone line translation service could be used.

Gain an Account



- Interview is a word that gives fear – ask people for a discussion or a chat
- Explain who you are and what your role is and importantly how you can help.
 - Be careful to not set any promises you cannot fulfil.
- Only if appropriate, explain why the conversation is taking place and what you will be talking about and how long it will take.
- Try to establish rapport with the victim and make them feel comfortable. Make eye contact and smile

Obtain the witness's own uninterrupted account

please note

- if the account needs to be formally recorded, ensure this happens
- if the account breaches your pre-determined boundaries – how do you de-escalate.
- Use the 5 W questions (who, what, where, when, why) however remember this is not an interview and HOW is a much more effective question.
 - How did you hear about the job? How did you get to the UK?
- The most effective questions used in an informal setting is to use the TED approach.
 - Tell me
 - Explain to me
 - Describe to me
- This will also help you avoid leading questions

Remember - The organisation is committed to the six key principles of safeguarding and will always;

Empowerment - adults should receive support that's personal to them, chosen by them and has their consent.

Prevention – action should always be taken before any harm to the adult occurs.

Proportionality – responses should be non-intrusive to the adult and proportionate to the risks presented.

Protection – there should be adequate support and representation for those in greatest need.

Partnership – services within the community should work to prevent, detect and report abuse and neglect.

Accountability – safeguarding should be delivered transparently and with accountability

Closure



- Explain what will happen next
- Provide contact details in case they want to talk again or remember something
- Provide worker rights information at every opportunity
- Have they got any questions

Evaluation



- Evaluate what was said and the implications of the information received.
- Assess against the case handling procedure.
- Discuss options with the internal incident team.

Step 5 - Decision Whether to Escalate



- Review Steps 1 & 2 of this procedure
- If there is NO suspicious activity or suspected instance of a worker welfare issue, remain vigilant but no further action at present

External Support



Additional support if required:

- Hope for Justice – info.uk@hopeforjustice.org Tel: 0300 008 8000
- Salvation Army – 0300 3038151



TylerBladon Practical Ethics has a combined experience of over 35 years' experience handling cases from a Labour User and Labour Provider perspective. We can support you on what to do? When to do it? And support you in protecting all stakeholders.

Step 6 – Stakeholder Management.

Either Retailer/Supplier Protocol 2013 is invoked or you are subject to the instruction of the Police authorities. Irrespective, you will be required to take their guidance on who you can and cannot inform.

- Inform customer (if appropriate)
- Inform supplier (if appropriate) and work within the scope of the Supply Chain Protocol.
- If the press is involved refer to press office or designated responsible person in your organisation. (notify affected stakeholders of press interest)

Step 7 – Remedy.



In the preparation section of this procedure, a remedy definition should have been determined.

A review should now be conducted to achieve remedy wherever possible.



The UN Guiding recommends an organisation has a Remedy process.

When a human rights issue is identified, victims are to have access to effective remedies. Supported by genuine engagement and dialogue with the stakeholder whose rights are to be remedied.

Remedy can only be determined by the potential victim and in most cases, most remedy options as prescribed by NGOs are not available to you.

Therefore your primary duty is to meet you obligations under the 6 key principles of safeguarding.

Empowerment - adults should receive support that's personal to them, chosen by them and has their consent.

Did you ascertain the support the vulnerable adult needed? Were the actions chosen by them and did you gain their consent throughout?

Prevention – action should always be taken before any harm to the adult occurs.

Have you established how the situation happened and taken appropriate actions to prevent a reoccurrence?

Proportionality – responses should be non-intrusive to the adult and proportionate to the risks presented.

Did you provide a proportional response to the risks presented?

Protection – there should be adequate support and representation for those in greatest need.

Did you provide adequate protection throughout or delegate protection to higher authorities / organisations?

Partnership – services within the community should work to prevent, detect and report abuse and neglect.

Where possible did you work in partnership with other organisations / stakeholders / authorities and NGOs to prevent, detect and report welfare issues?

Accountability – safeguarding should be delivered transparently and with accountability.

Were all of you decisions made in good faith and are you satisfied that the organisation is accountable for their actions?



Step 8 – Review & Share knowledge



Once the case has been resolved, a formal internal meeting will take place on site to review the case, discuss root cause analysis and put any corrective actions in place.

Learnings from the case should be shared with all stakeholders that could benefit from the situation. (Suitably redacted of course)

Appendix

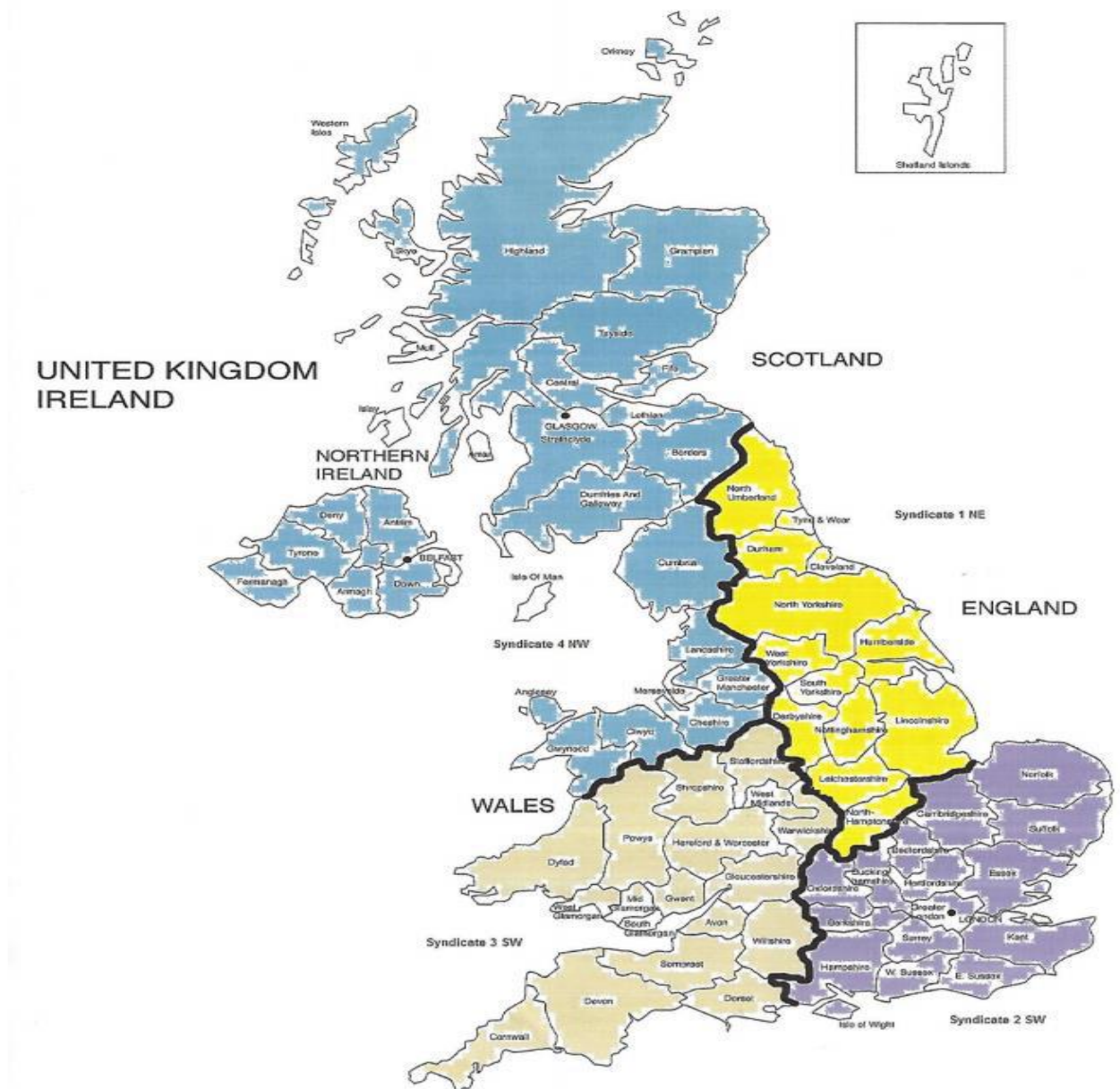
GLAA contacts

Syndicate 1 (North East) Dave Powell – 07825797111

Syndicate 2 (South East) Jenni Baines – 07733104663

Syndicate 3 (South West) Andrew Davies – 07789459518

Syndicate 4 (North West) Martin Plimmer – 07818596397



Appendix

Supplier Protocol

Introduction

The organisation under its commitment to compliance of the Modern Slavery Act 2015 requires the development of a commercially safe ‘communication’ network within the supply chain to ensure we can all work together in the eradication of slavery, trafficking and exploitation from any part of the supply chain.

- A **supply chain** is comprised of all the businesses and individual contributors involved in creating a product, from raw materials to finished merchandise.
- The term “**supplier**” includes any business which supplies products to the organisations operations in the UK. Such businesses are often referred to as “**labour users**”, if they use labour supplied by **labour providers** as part of their production process.

It would always be good practice to share accurate information in a timely and secure manner wherever it is necessary, legitimate, proportionate, and relevant and justified to do so. Information and intelligence sharing should be regarded very much as a two-way process.

Terms of the Protocol

1 Sharing Information

- 1.1 Suppliers hold and have access to information that may be of assistance in identifying breaches the Modern Slavery Act 2015. This Protocol is predicated on the expectation that this information may be shared with the Organisation Business in order that there is a joint approach to maintaining an ethical supply chain where workers are protected against exploitation. The default position will be that the Organisation Business will share information, given it is appropriate to do so with suppliers.
- 1.2 There should be a designated specific point of contact (SPOC) within each supplier for the exchange of information with the Organisation businesses SPOC. It is expected that the individual or individuals who take on this role will have enough seniority to be responsible for the exchange of information and an understanding of how sensitive information should be handled.
- 1.3 Any information received by any stakeholder should be handled sensitively and appropriately and must not be released externally without prior consultation with the original sender.
- 1.4 Where significant issues are identified suppliers, agree to notify the Organisation business immediately by email or phone. Identified problems may indicate that urgent action is required to protect workers from exploitation or abuse, where such cases arise the welfare of the worker takes priority.
- 1.5 Whenever practicable the Organisation business will work with the supplier and share any findings of any enforcement action or investigation within the supply chain. All parties in receipt of confidential information shared this way will maintain it as strictly confidential. Information will only be shared externally where there is a significant risk to both workers and/or to the supply chain. In these cases, the supplier and the Organisation Business will meet or liaise to consider any required action. In all other appropriate cases the Organisation business and the supply chain will agree to work together to resolve any identified issues involving labour providers.
- 1.6 The Organisation business will not pass on or share such information with any stakeholder unless it is considered necessary, legitimate, proportionate, and relevant given we are justified to do so. Any intelligence or information received by the Organisation business will be assessed, graded and subject to investigation prior to any decision being taken over stakeholder engagement.

It is agreed that all parties will, where possible, share information that will help stop or prevent the exploitation or abuse of workers.

All information will be treated sensitively and appropriately and will not be disseminated without prior reference to the original sender.

It is agreed that suppliers will encourage their respective suppliers to make available to the Organisation business any information which may indicate that significant breaches of the Modern Slavery Act 2015.

- 1.7 Suppliers recognise that they can sign up for the active check. This alerts subscribers to:
- revocation with immediate effect
 - revocation without immediate effect coming into force
 - when a license holder has been inspected by the Organisation business

Signing up to the active check is a means of reducing risk in the event of problems with a labour provider. The Organisation business will acknowledge efforts made by suppliers and will seek to work with all involved where appropriate to resolve ongoing issues.

Irrespective of signing up to active check or not, the Organisation business requires any Labour Provider details from your supply chain and will complete a GLAA active check anyway.

- 1.8 Liaison between suppliers on non-compliance issues is encouraged and where suppliers identify issues within labour provision that can be rectified, they are encouraged, where appropriate, to act accordingly and to accurately record those issues identified and any corrective action taken. Care should be taken however if criminal offences or significant issues are suspected, as workers may be put at risk and suppliers are advised to immediately seek advice in these cases via the Organisation business who will assist, advise or act as proportionate and necessary in the individual circumstances.

It is agreed that the Organisation business will provide appropriate advice to suppliers where appropriate.

The Organisation business recognises and respects the contractual relationships between suppliers, potentially other customers and labour providers.

The Organisation business will work with Suppliers to ensure such commercial arrangements are respected.

2 Working Together

- 2.1 The Organisation business will always seek to work in partnership with suppliers. The Organisation business would like to meet regularly with suppliers at all levels so that inspection findings, lessons learned, positive initiatives etc. can be disseminated to inform of best practice.
- 2.2 The Organisation business will actively work with suppliers at all levels to produce and continually review best practice guidance in order to help prevent exploitation within the supply chains.
- 2.3 The Organisation business will provide contact details who will act as liaison points for suppliers, who may then seek advice and guidance on any issues. Suppliers are encouraged to develop contact with the Organisation business.
- 2.4 The Organisation business will provide and circulate to suppliers any material that is developed to assist with preventing worker exploitation and abuse.
- 2.5 Suppliers are encouraged to display material and contact details for The Organisation business to assist workers who may experience exploitation and abuse, and/or be victim to those committing more serious offences.
- 2.6 The Organisation business will work with the supply chain ethical auditors to encourage a consistent approach.

It is agreed that the Organisation business will work with suppliers who work within the spirit of this protocol.

3 Communications

- 3.1 Suppliers will request their respective suppliers to register for the GLAA's Active Check Service (where applicable) and to ensure they have appropriate arrangements in place to receive alerts.
- 3.2 The Organisation business will maintain a list of those who have signed up for the active check.
- 3.3 Suppliers who use other businesses as part of their overall supply to the Organisation business are encouraged to make themselves aware of all labour supply within those businesses and to ensure that all use of such labour is licensed, e.g. by using the active check. Issues, where suspected significant or critical breaches of licensing standards within lower tier suppliers are identified, should be immediately reported to the Organisation business. Suppliers are encouraged to share details of lower tier Labour providers, so that suitable Active checks can be completed.
- 3.4 In cases where the Organisation business does not receive co-operation from a supplier who has been approached in connection with a GLAA / Police /Immigration investigation into an exploitation issue. The Organisation business may, where appropriate, approach the retailer / government authorities for advice and/or assistance.
- 3.5 The Organisation business will periodically issue information to all stakeholders.
- 3.6 The Organisation business reserves the right, for operational reasons, to step outside of this communication agreement with all stakeholders if it is made aware of potential complicity, but will, where possible, work with suppliers, retailers and labour providers to reduce risk, ensure compliance and prevent exploitation.
- 3.7 Where appropriate, suppliers should invite the Organisation business to attend their appropriate conferences/meetings to provide information for steps that suppliers may take to eradicate worker abuse.

All parties agree to work together to raise awareness within the supply chain to help to prevent and protect workers from exploitation or abuse.

All parties will ensure the whole the Organisation business supply chain works to ensure all suppliers at every level are working towards the Organisation business compliance standards.

- 4 Action Following a GLAA Investigation or Government Operation**
- 4.1 The Organisation business encourages all suppliers to take decisive action following any operation or investigation which identifies significant worker abuse within their supply chain. The Organisation business will always respond promptly to requests for advice.
- 4.2 The Organisation business will, where possible, liaise with all parties to achieve a common solution and reduce risk to workers.
- 4.3 Where a GLAA operation **identifies** abuse of workers in the supply chain, and where this information is shared with the Organisation business. Where possible, and subject to any ongoing appeal or criminal proceedings, the Organisation business will **inform** all relevant parties of the findings. Ideally this should be in the form of a full debrief to take place at the Supplier's site and should be attended by all parties and will include a senior member of the Organisation business management team.
- 4.4 If, following an approach to a supplier, the matter cannot be resolved satisfactorily, and the Organisation business considers it has no other alternative, the retailer(s) or authorities will be contacted.
- 4.5 All parties involved are requested to inform the Organisation business of what steps are to be taken to correct or eradicate the identified worker exploitation.

All parties agree to take the necessary steps to ensure that exploitation of workers identified is eliminated.

All parties agree that the welfare of all employees remains the primary objective throughout any investigation.

Worker Welfare, Exploitation & Modern Slavery Response Plan.

5 Publicity

- 5.1 The Organisation Business will not pass on or share information with the media.
- 5.2 Suppliers should provide The Organisation business with contact details for their SPOC (Specific Point of Contact).
- 5.3 The Organisation business will acknowledge collaborative work with suppliers in any press releases and media engagement if required / agreed.
- 5.4 The Organisation business will advise the supplier or SPOC of any approach made to the Organisation business for interview or comment relevant to them.
- 5.5 All the above Organisation business commitments under the 'Publicity' section are expected to be reciprocated by the supplier.

All parties agree to work together to promote the benefits and achievements of this Protocol through media engagement at the appropriate times.