



## **Preventing Hidden Labour Exploitation Policy**

### **Policy Statement**

Larkspur Group Ltd commits to developing and adopting a proactive approach to tackling hidden labour exploitation.

Hidden labour exploitation is defined as exploitation of job applicants and / or workers by a third party individual or gangs other than the employer or labour provider including rogue individuals working within these businesses but without the knowledge of management. This can include forced labour and human trafficking for labour exploitation, payment for work-finding services and work-related exploitation such as forced accommodation.

### **Purpose**

The purpose of this policy is to provide clarity to all employees, agency workers and labour users on the Company's standards, processes and actions that it commits to take in order to protect workers from the threat of labour exploitation.

This policy is applicable to all sites supplied with temporary workers.

### **Responsibilities**

The Managing Director and all employees responsible for directly recruiting workers are responsible for the enforcement of this policy and accompanying procedures.

### **Our Policy Commitments**

Larkspur Group Ltd shall:

1. Designate appropriate employees 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 employees are aware of issues around third party labour exploitation and signs to look for and have signed appropriate Compliance Principles.
4. Ensure that labour sourcing, recruitment and worker placement processes are under the control of trusted and competent employees.
5. Adopt a proactive approach to reporting suspicions of hidden worker exploitation to the Gangmaster Licensing Authority and Police.



6. Provide information on tackling “Hidden Labour Exploitation” to our workforce through a variety of formats including training, workplace posters, workers leaflets, inductions and employee interviews.
7. Encourage employees 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 maybe occurring within their communities. Larkspur Group Ltd will ensure that all information provided will be kept confidential and will be dealt with correctly, and that the matter will be investigated fully, appropriately and with sensitivity.
9. Require labour providers and other organisations in the labour supply chain to adopt policies and procedures consistent with the above.