

Date approved: March 2021  
Review date: March 2024  
Version 1.0



St Monica Trust

---

# Tackling Modern Slavery in Business and Supply Chains Policies

## Policy Lead

- Paul Baxter, HR Manager

## Policy Readers

- Julie Haydon, Director of People
- Kevin Hall, Director of Group Services
- Mark Thomas, Facilities Operations Manager

## Document Status

**This is a controlled document. Whilst this document may be printed, the electronic version is the controlled copy.**

**Any printed copies of this document are not controlled by the Policy Coordinator. The controlled document can be found on:**

**[P:\Shared \(no security\)\Shared Policies\2. Corporate](#)**

**Policy should be read in conjunction with:**

- Equality, diversity and inclusion policy
- Recruitment policy
- Safeguarding adults from abuse policy and procedure
- Whistleblowing policy

**DOCUMENT CONTROL**

|             |   |
|-------------|---|
| Prepared by | Policy Lead and Policy and Development Co-ordinator |
| Approved by | Policy Review Group                                 |

|                 |  |
|-----------------|--|
| Version control | v1.0 – Tackling Modern Slavery in Business and Supply Chains Policies<br>(this document) |
|-----------------|--|

The content of this procedure will be reviewed every three years, or sooner if there is a change in legislation, regulation or level of risk.

| Date of update | Update description | Pages affected |
|----------------|--------------------|----------------|
|                |                    |                |
|                |                    |                |

This policy has been subject to consultation with the individuals listed in the ‘Policy Readers’ section on the front cover. It will be communicated through managers’ emails and it is the responsibility of all managers to share this document with their staff. It is the responsibility of all colleagues to read and be aware of this procedure. All policies and procedures are stored electronically: P:\Shared (no security)\Shared Policies and all sites will have a set of policy folders.

# CONTENTS

|  |    |
|--|----|
| 1. INTRODUCTION .....  | 1  |
| 2. LEGAL REQUIREMENTS .....  | 1  |
| 3. VALUES AND MISSION.....   | 1  |
| 4. ROLES AND RESPONSIBILITIES.....   | 1  |
| 4.1 Director of Group Services.....  | 1  |
| 4.2 Training and Development Manager.....  | 1  |
| 4.3 Recruitment Manager .....  | 2  |
| 4.4 All Colleagues.....  | 2  |
| 5. PROCUREMENT PRINCIPLES RELATING TO MODERN SLAVERY POLICY .....  | 2  |
| 5.1 Our Principles .....   | 2  |
| 5.2 Supplier Standards .....   | 2  |
| 6. MODERN SLAVERY IN SUPPLY POLICY .....   | 3  |
| 6.1 Supplier Standards .....   | 3  |
| 6.2 Prison Labour .....  | 3  |
| 6.3 Coercion .....   | 4  |
| 6.4 Coercion in Wage Payment, including Debt Bondage and Bonded Labour .....   | 4  |
| 6.5 Disciplinary Measures.....   | 5  |
| 6.6 Compulsory Overtime .....  | 5  |
| 6.7 Migration for Employment.....  | 6  |
| 6.8 Document Retention .....   | 6  |
| 6.9 Private Employment Agencies .....  | 6  |
| 6.10 Contracts of Employment.....  | 7  |
| 6.11 Worst Forms of Child Labour .....   | 7  |
| 7. POLICY ON PREVENTING HIDDEN LABOUR EXPLOITATION .....   | 7  |
| 7.1 Policy Statement.....  | 7  |
| 7.2 Policy Commitments .....   | 7  |
| 7.3 If you suspect someone is the victim of human trafficking or modern slavery.....   | 8  |
| 8. MONITORING EFFECTIVENESS OF THIS POLICY.....  | 8  |
| Appendix 1: SUMMARY VERSION OF PROCUREMENT PRINCIPLES RELATING TO<br>MODERN SLAVERY AND MODERN SLAVERY IN SUPPLY POLICY – TO BE GIVEN TO<br>SUPPLIERS..... | 9  |
| Appendix 2: Recruiting Manager Compliance Principles .....   | 15 |

## **1. INTRODUCTION**

St Monica Trust commits to developing and adopting a proactive approach to prevent, respond to and remediate the risks of modern slavery, forced and debt-bonded labour, human trafficking and hidden exploitation within its workplaces and supply chain.

## **2. LEGAL REQUIREMENTS**

Section 54 of the Modern Slavery Act 2015 requires some organisations to prepare a slavery and human trafficking statement for each financial year, setting out the steps that the organisation has taken during the year to ensure that slavery and human trafficking is not taking place in its supply chains or its own business (or setting out that it has taken no such steps).

Although St Monica Trust is not required to produce an annual statement under the legislation, we have adopted this policy in order to take positive action demonstrating our support of the government's objectives to eradicate modern slavery and human trafficking.

## **3. VALUES AND MISSION**

This policy is consistent with the following core values:

- We are people people
- We are caring
- We are honest
- We are responsive

The Trust values it's people and cares about their lives and demonstrates this by having effective systems and controls in place to safeguard against any form of modern slavery taking place within the Trust or our supply chain.

## **4. ROLES AND RESPONSIBILITIES**

### **4.1 Director of Group Services**

Provides all suppliers who do not have their own Modern Slavery Policy or Statement with copies of the St Monica Trust "Tackling Modern Slavery in Business and Supply Chains policies" document and request that a signed declaration is returned.

Ensures that the Trust only contract with formal labour providers with an identifiable and distinct legitimate business entity.

### **4.2 Training and Development Manager**

Implement induction and training programmes for colleagues that will include tackling hidden labour exploitation.

### **4.3 Recruitment Manager**

Ensure that recruiters are trained to spot the signs of hidden labour exploitation and have signed appropriate Compliance Principles.

Verify our labour supply chain to ensure agents used to source and supply workers are not charging job applicants a work finding fee.

Develop due diligence checks in the appointment of labour providers to establish their credibility and legitimacy.

### **4.4 All Colleagues**

All colleagues are responsible for the success of this policy and should ensure that they use it to disclose any concerns about modern slavery or human trafficking in the workplace, including suppliers. Colleagues are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Policy Lead named on the front page.

## **5. PROCUREMENT PRINCIPLES RELATING TO MODERN SLAVERY POLICY**

### **5.1 Our Principles**

We aim to work with suppliers who share our objective of promoting and protecting the rights of workers throughout the supply chain.

We depend on our suppliers to ensure that together we identify and address any human rights violations in our supply chain.

Where a supplier does not meet the standards set out and agreed, has not met agreed improvement action plans and is unwilling to improve, then we will cease our trading agreement.

### **5.2 Supplier Standards**

These standards apply to suppliers directly contracted with us to provide goods or services and form part of our terms and conditions. Suppliers are required to:

- Meet the standards set out in this document and in all related Supplier Policies issued from time to time, including our Modern Slavery in Supply Chain Policy.
- Be fully aware of and to abide by all relevant local and national laws and regulations.
- Demonstrate that the same standards have been communicated to and are adhered to by their suppliers and sub-contractors.
- Ensure that they are similarly protecting the rights of any workers on their site, whether agency or other indirectly-employed workers, by undertaking due diligence checks on agencies, labour providers or contractors.

## **6. MODERN SLAVERY IN SUPPLY POLICY**

As part of our broader approach to protecting and promoting human rights in our supply chain, we neither support nor condone any form of modern slavery.

Modern Slavery is a term developed by the UK Government to describe acts of slavery, servitude, forced or compulsory labour and human trafficking. Full definitions of these terms can be found in the UK Government's 'Transparency in Supply Chains etc. A practical guide'.

The International Labour Organization (ILO) estimates that there are 20.9 million persons in forced labour globally, including 14.2 million in the private economy and the 2016 Global Slavery Index estimates that there are 45.8 million in modern slavery worldwide.

Given the prevalence of modern slavery and the complexity of today's supply chains, we recognise our responsibility to identify and tackle the potential for modern slavery within our own supply chain.

We undertake to do the following:

- Communicate our modern slavery in supply chain policy, including the following supplier standards, to our suppliers.
- Communicate our procurement principles to our suppliers.
- Expect our suppliers to require the same requirements of their suppliers.
- Provide training for our staff to raise awareness and develop capability.
- Undertake appropriate investigations if modern slavery is reported or suspected in our supply chain.
- Ensure that, where it is found that we have caused or contributed to modern slavery, we provide or contribute to appropriate remediation.

### **6.1 Supplier Standards**

These standards are drawn from the ILO's Declaration on Fundamental Principles and Rights at Work; the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy; the UN Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children; and the UN Guiding Principles on Business and Human Rights.

These standards apply to all suppliers contracted to provide goods and services and their labour providers.

### **6.2 Prison Labour**

Work or service can only be required from prisoners who have been convicted in a court of law. Such work or service must be carried out under the supervision and control of a public authority, for example the prison administration of a State-run facility. Prison workers must not be hired to or placed at the disposal of private

individuals, companies or associations. Compulsory work or service by prisoners is not allowed for private undertakings either inside or outside the prison, or within privately administered prisons.

Work or service performed by prisoners in a private undertaking must be voluntary. Prison workers must give their consent to working for a private employer without being subject to a threat or penalty, including the loss of rights or privileges within the prison.

Conditions for prisoners who have consented to work within private undertakings should approximate the conditions enjoyed by free workers. Prison workers should have access to wage levels, social security benefits and occupational safety and health standards that approximate a free labour relationship. Reasonable differences in wage levels are acceptable on the basis of deductions made for board and lodging and for contributions to victim compensation schemes.

### **6.3 Coercion**

**Freedom of Employment:** All workers shall have the right to enter into employment voluntarily and freely, without the threat of a penalty.

**Termination of Employment:** Workers shall have the freedom to terminate employment of indefinite or long duration by means of notice of reasonable length (in accordance with national law or collective agreement) at any time without penalty. Workers on contracts of fixed duration shall not be required to serve beyond the expiry of their contract. Employers shall not use means to restrict a worker's ability to terminate employment, for example by requiring deposits, withholding employee documentation, threats or use of violence, imposing financial penalties or requiring payment of recruitment fees.

**Threat of Violence, Harassment & Intimidation:** Employers shall not exact work or service from any person under the menace of any penalty. This includes the use or threat of physical or sexual violence or harassment.

### **6.4 Coercion in Wage Payment, including Debt Bondage and Bonded Labour**

Wages shall be paid regularly, and methods of payment are prohibited that deprive workers of the genuine possibility of terminating employment. Wage payments shall not be delayed or deferred such that wage arrears accumulate.

Wages shall be paid directly to the worker and should be paid in legal tender, or by cheque or money order where permitted by law, collective agreement or with the consent of the worker. Payment in the form of vouchers, coupons or promissory notes is prohibited.

Payments "in kind" in the form of goods or services shall not be used to create a state of dependency of the worker on the employer. "In-kind" payments should only

be partial to ensure that the worker is not totally deprived of cash remuneration and are permitted only if authorised by national law, regulation or collective agreement.

Workers who earn wages calculated on a performance-related or piece-rate basis shall not earn less than the legally mandated minimum wage.

Workers shall not be held in debt bondage or forced to work for an employer in order to pay off an actually incurred or inherited debt.

Deception in wage payment, wage advances and loans to employees shall not be used as a means to bind workers to employment. Advances and loans, and deductions from wages made for their repayment, shall not exceed the limits prescribed by national law. Workers shall be duly informed of the terms and conditions surrounding the granting and repayment of advances and loans.

No deductions from wages shall be made with the aim of indebting a worker and binding him or her to employment, and measures should be taken to limit wage deductions to prevent such conditions. Workers shall be informed of the conditions and extent of wage deductions, and only deductions authorised by national law, collective agreement or arbitration award shall be made.

Workers shall not be compelled to make use of stores or services operated in connection with an undertaking. Where access to other stores or services is not possible, employers shall ensure that goods or services are sold or provided at fair and reasonable prices, without the aim of indebting or otherwise coercing the workers concerned.

## **6.5 Disciplinary Measures**

Disciplinary measures should not include sanctions that result in an obligation to work.

Compulsory labour shall not be used to discipline workers or as punishment for participation in a strike.

## **6.6 Compulsory Overtime**

Workers shall not be forced to work overtime above the limits permitted in national law and collective agreements under the menace of a penalty, for example the threat of dismissal.

Work or service outside normal daily working hours shall not be imposed by exploiting a worker's vulnerability under the menace of a penalty. For example, employers shall not set performance targets that result in an obligation to work beyond normal working hours because of the worker's need to be able to earn the minimum wage.



Freedom of Movement: Coercion shall not be used to physically confine or imprison workers to the workplace or related premises, for example employer operated residences. Mandatory residence in employer operated residences shall not be made a condition of employment.

Conditions relating to Skills Development and Vocational Training: Training opportunities provided to employees shall be undertaken voluntarily. Employers who provide such opportunities shall not unreasonably impose work or service as a means of recovering the costs associated with them.

## **6.7 Migration for Employment**

Migrant workers, irrespective of their legal status, shall be treated fairly, and measures shall be taken to prevent abusive conditions and fraudulent practices that may lead to coercion and trafficking for labour exploitation.

Migrant workers shall benefit from conditions of work no less favourable than those available to local workers and shall have the right to enter into and terminate employment (with reasonable notice in accordance with national law or collective agreement) voluntarily and freely, without the threat of a penalty.

Employers shall not threaten irregular migrant workers or their family members with denunciation to the authorities or otherwise coerce such workers into taking up or maintaining employment.

Recruitment of Migrant Workers: No fee or cost for recruitment shall be charged directly or indirectly, in whole or in part, to the worker. If an exception is made, it should be in the interest of the workers concerned, and after consulting the most representative organisations of employers and workers. All costs related to recruitment should be disclosed to the workers.

## **6.8 Document Retention**

Practices such as confiscating or withholding worker identity documents or other valuable items (eg work permits and travel documentation) are prohibited.

However, if requested by workers, employers may provide secure storage for such documents. Workers must then be free to access them at any time upon request.

Employers shall not retain personal documents for the purpose of binding workers to employment.

## **6.9 Private Employment Agencies**

Within their sphere of influence and to the best of their ability, employers who engage private employment agencies to recruit members of their workforce shall take measures to:

- Ensure that such agencies do not engage in fraudulent practices that place workers at risk of forced labour and trafficking for labour exploitation.
- Prevent the abuse of workers contracted by such agencies, for example by ensuring that such workers receive adequate protection in relation to wage related matters, working hours, overtime and other working conditions.
- To the greatest extent possible, ensure that fees or costs related to recruitment are not borne by workers but by the contracting company.
- Use only those recruitment agencies that are licensed or certified by the competent authority.

### **6.10 Contracts of Employment**

Employers shall provide written contracts of employment in a language that migrant workers can easily understand and that clearly indicate their rights and responsibilities with regard to payment of wages, working hours, valid grounds for termination and other issues related to preventing forced labour.

### **6.11 Worst Forms of Child Labour**

Employers shall take immediate and effective measures to prevent and eliminate the engagement of children in the worst forms of child labour, as defined by article 3 of ILO Convention No. 182, including debt bondage, serfdom, forced or compulsory labour and all forms of slavery and practices similar to slavery, such as the sale and trafficking of children.

Employers who engage private employment agencies shall ensure that such agencies do not engage children in the worst forms of child labour as indicated above.

## **7. POLICY ON PREVENTING HIDDEN LABOUR EXPLOITATION**

### **7.1 Policy Statement**

St Monica Trust commits to developing and adopting a proactive approach to tackling hidden labour exploitation. Hidden labour exploitation is 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 themselves as such, reluctant to come forward.

### **7.2 Policy Commitments**

St Monica Trust shall:

- Designate appropriate managers (members of the Modern Slavery and Human Trafficking project team) 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.

- 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 (see Appendix 2).
- 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 and police.
- Provide information on tackling “Hidden Labour Exploitation” to our workforce (through workplace posters, worker leaflets, induction, and other training).
- Encourage workers to report cases of hidden third-party labour exploitation, provide the means to do so and investigate and act on reports appropriately.
- Require labour providers and other organisations in the labour supply chain to adopt policies and procedures consistent with the above.
- Investigate as a potential gross misconduct offence allegations of the acceptance of bribes or inducements to recruit or favour workers or of any form of physical or mental mistreatment, coercion, bullying or harassment of workers.

### **7.3 If you suspect someone is the victim of human trafficking or modern slavery**

If you have any suspicions about potential human trafficking, forced labour or any other hidden labour exploitation please notify the Gangmasters and Labour Abuse Authority on 0800 432 0804.

## **8. MONITORING EFFECTIVENESS OF THIS POLICY**

The Trust has a Modern Slavery and Human Trafficking project team that meets regularly to share information and discuss and make decisions relating to the organisation’s Modern Slavery and Human Trafficking action plan.

The chair of the group is responsible for reporting on activities of the group to the executive sponsor, Julie Haydon, Director of People.

The team will conduct a review of the relevance and value of its work and its terms of reference at least once a year.

## **SUMMARY VERSION OF PROCUREMENT PRINCIPLES RELATING TO MODERN SLAVERY AND MODERN SLAVERY IN SUPPLY POLICY – TO BE GIVEN TO SUPPLIERS**

### **Part One - PROCUREMENT PRINCIPLES RELATING TO MODERN SLAVERY**

#### **Our Principles**

We aim to work with suppliers who share our objective of promoting and protecting the rights of workers throughout the supply chain.

We depend on our suppliers to ensure that together we identify and address any human rights violations in our supply chain.

Where a supplier does not meet the standards set out and agreed, has not met agreed improvement action plans and is unwilling to improve, then we will cease our trading agreement.

#### **Supplier Standards**

These standards apply to suppliers directly contracted with us to provide goods or services and form part of our terms and conditions. Suppliers are required to:

- Meet the standards set out in this document and in all related Supplier Policies issued from time to time, including our Modern Slavery in Supply Chain Policy.
- Be fully aware of and to abide by all relevant statutory obligations.
- Demonstrate that the same standards have been communicated to and are adhered to by their suppliers and sub-contractors.
- Ensure that they are similarly protecting the rights of their workers, whether agency or other indirectly-employed workers, by undertaking suitable and sufficient due diligence checks on agencies, labour providers or contractors.

I (undersigned) acknowledge receipt of these Procurement Principles and understand that we are legally obliged to comply as part of the terms and conditions of our contract.

Signed:

---

On behalf of (company name):

---

Print Name:

---

Position/Title:

---

Date:

---

## **Part Two - MODERN SLAVERY IN SUPPLY POLICY**

As part of our broader approach to protecting and promoting human rights in our supply chain, we neither support nor condone any form of modern slavery.

Modern Slavery is a term used to encapsulate the various offences relating to acts of slavery, servitude and forced or compulsory labour, and human trafficking. Full definitions of these terms can be found in the UK Government's 'Transparency in Supply Chains etc. A practical guide'.<sup>1</sup>

The International Labour Organization (ILO) estimates that there are 20.9 million persons in forced labour globally, including 14.2 million in the private economy<sup>2</sup> and the 2016 Global Slavery Index estimates that there are 45.8 million in modern slavery worldwide<sup>3</sup>.

Given the prevalence of modern slavery and the complexity of today's supply chains, we recognise our responsibility to identify and tackle the potential for modern slavery within our own supply chain.

We undertake to do the following:

- Communicate our modern slavery in supply chain policy, including the following supplier standards, to our suppliers.
- Communicate our procurement principles to our suppliers.
- Expect our suppliers to require the same requirements of their suppliers.
- Provide training for our staff to raise awareness and develop capability.
- Undertake appropriate investigations if modern slavery is reported or suspected in our supply chain.
- Ensure that, where it is found that we have caused or contributed to modern slavery, all appropriate action is taken in so far as it is possible for us to do so.

### **Supplier Standards**

These standards are drawn from the ILO's Declaration on Fundamental Principles and Rights at Work and the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, the UN Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, and the UN Guiding Principles on Business and Human Rights.

---

<sup>1</sup>

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/649906/Transparency\\_in\\_Supply\\_Chains\\_A\\_Practical\\_Guide\\_2017.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/649906/Transparency_in_Supply_Chains_A_Practical_Guide_2017.pdf)

<sup>2</sup> [http://www.ilo.org/global/topics/forced-labour/news/WCMS\\_182109](http://www.ilo.org/global/topics/forced-labour/news/WCMS_182109)

<sup>3</sup> <https://www.globallslaveryindex.org/>

These standards apply to all suppliers contracted to provide goods and services and their labour providers.

### **Prison Labour**

1. Work or service can only be required from prisoners who have been convicted in a court of law. Such work or service must be carried out under the supervision and control of a public authority, for example the prison administration of a State-run facility. Prison workers must not be hired to or placed at the disposal of private individuals, companies or associations. Compulsory work or service by prisoners is not allowed for private undertakings either inside or outside the prison, or within privately administered prisons.
2. Work or service performed by prisoners in a private undertaking must be voluntary. Prison workers must give their consent to working for a private employer without being subject to a threat or penalty, including the loss of rights or privileges within the prison.
3. Conditions for prisoners who have consented to work within private undertakings should approximate the conditions enjoyed by free workers. Prison workers should have access to wage levels, social security benefits and occupational safety and health standards that approximate a free labour relationship. Reasonable differences in wage levels are acceptable on the basis of deductions made for board and lodging and for contributions to victim compensation schemes.

### **Coercion**

4. Freedom of Employment: All workers shall have the right to enter into employment voluntarily and freely, without the threat of a penalty.
5. Termination of Employment: Workers shall have the freedom to terminate employment of indefinite or long duration by means of notice of reasonable length (in accordance with national law or collective agreement) at any time without penalty. Workers on contracts of fixed duration shall not be required to serve beyond the expiry of their contract. Employers shall not use means to restrict a worker's ability to terminate employment, for example by requiring deposits, withholding employee documentation, threats or use of violence, imposing financial penalties or requiring payment of recruitment fees.
6. Threat of Violence, Harassment & Intimidation: Employers shall not exact work or service from any person under the menace of any penalty. This includes the use or threat of physical or sexual violence or harassment.

### **Coercion in Wage Payment, including Debt Bondage and Bonded Labour**

7. Wages shall be paid regularly, and methods of payment are prohibited that deprive workers of the genuine possibility of terminating employment. Wage payments shall not be delayed or deferred such that wage arrears accumulate.
8. Wages shall be paid directly to the worker and should be paid in legal tender, or by cheque or money order where permitted by law, collective agreement or with the

consent of the worker. Payment in the form of vouchers, coupons or promissory notes is prohibited.

9. Payments “in kind” in the form of goods or services shall not be used to create a state of dependency of the worker on the employer. “In-kind” payments should only be partial to ensure that the worker is not totally deprived of cash remuneration and are permitted only if authorised by national law, regulation or collective agreement.
10. Workers who earn wages calculated on a performance-related or piece-rate basis shall not earn less than the legally mandated minimum wage.
11. Workers shall not be held in debt bondage or forced to work for an employer in order to pay off an actually incurred or inherited debt.
12. Deception in wage payment, wage advances and loans to employees shall not be used as a means to bind workers to employment. Advances and loans, and deductions from wages made for their repayment, shall not exceed the limits prescribed by national law. Workers shall be duly informed of the terms and conditions surrounding the granting and repayment of advances and loans.
13. No deductions from wages shall be made with the aim of indebting a worker and binding him or her to employment, and measures should be taken to limit wage deductions to prevent such conditions. Workers shall be informed of the conditions and extent of wage deductions, and only deductions authorised by national law, collective agreement or arbitration award shall be made.
14. Workers shall not be compelled to make use of stores or services operated in connection with an undertaking. Where access to other stores or services is not possible, employers shall ensure that goods or services are sold or provided at fair and reasonable prices, without the aim of indebting or otherwise coercing the workers concerned.

### **Disciplinary Measures**

15. Disciplinary measures should not include sanctions that result in an obligation to work.
16. Compulsory labour shall not be used to discipline workers or as punishment for participation in a strike.

### **Compulsory Overtime**

17. Workers shall not be forced to work overtime above the limits permitted in national law and collective agreements under the menace of a penalty, for example the threat of dismissal.
18. Work or service outside normal daily working hours shall not be imposed by exploiting a worker’s vulnerability under the menace of a penalty. For example, employers shall not set performance targets that result in an obligation to work beyond normal working hours because of the worker’s need to be able to earn the minimum wage.
19. Freedom of Movement: Coercion shall not be used to physically confine or imprison workers to the workplace or related premises, for example employer-operated

residences. Mandatory residence in employer-operated residences shall not be made a condition of employment.

20. Conditions relating to Skills Development & Vocational Training: Training opportunities provided to employees shall be undertaken voluntarily. Employers who provide such opportunities shall not unreasonably impose work or service as a means of recovering the costs associated with them.

## **Human Trafficking & Forced Labour**

### **Migration for Employment**

21. Migrant workers, irrespective of their legal status, shall be treated fairly, and measures shall be taken to prevent abusive conditions and fraudulent practices that may lead to coercion and trafficking for labour exploitation.
22. Migrant workers shall benefit from conditions of work no less favourable than those available to local workers and shall have the right to enter into and terminate employment (with reasonable notice in accordance with national law or collective agreement) voluntarily and freely, without the threat of a penalty.
23. Employers shall not threaten irregular migrant workers or their family members with denunciation to the authorities or otherwise coerce such workers into taking up or maintaining employment.
24. Recruitment of Migrant Workers: No fee or cost for recruitment shall be charged directly or indirectly, in whole or in part, to the worker. If an exception is made, it should be in the interest of the workers concerned, and after consulting the most representative organisations of employers and workers. All costs related to recruitment should be disclosed to the workers.

### **Document Retention**

25. Practices such as confiscating or withholding worker identity documents or other valuable items (eg work permits and travel documentation) are prohibited.
26. However, if requested by workers, employers may provide secure storage for such documents. Workers must then be free to access them at any time upon request.
27. Employers shall not retain personal documents for the purpose of binding workers to employment.

### **Private Employment Agencies**

28. Within their sphere of influence and to the best of their ability, employers who engage private employment agencies to recruit members of their workforce shall take measures to:
29. Ensure that such agencies do not engage in fraudulent practices that place workers at risk of forced labour and trafficking for labour exploitation.



30. Prevent the abuse of workers contracted by such agencies, for example by ensuring that such workers receive adequate protection in relation to wage-related matters, working hours, overtime and other working conditions.
31. To the greatest extent possible, ensure that fees or costs related to recruitment are not borne by workers but by the contracting company.
32. Use only those recruitment agencies that are licensed or certified by the competent authority.

### **Contracts of Employment**

33. Employers shall provide written contracts of employment in a language that migrant workers can easily understand and that clearly indicate their rights and responsibilities with regard to payment of wages, working hours, valid grounds for termination and other issues related to preventing forced labour.

### **Worst Forms of Child Labour**

34. Employers shall take immediate and effective measures to prevent and eliminate the engagement of children in the worst forms of child labour, as defined by article 3 of ILO Convention No. 182, including debt bondage, serfdom, forced or compulsory labour and all forms of slavery and practices similar to slavery, such as the sale and trafficking of children.
35. Employers who engage private employment agencies shall ensure that such agencies do not engage children in the worst forms of child labour as indicated above.

### Recruiting Manager Compliance Principles

I confirm that I will:

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

I confirm that I understand and will comply with the above principles.

Recruiting Manager’s Name: .....

Recruiting Manager’s Signature: .....

Date: .....

I have checked and confirm that the Recruiter understands the above principles.

Manager’s Name: .....

Manager’s Signature: .....

Date: .....