

the
GREEN
house
growers



Tackling Modern Slavery & Hidden Labour Exploitation

Our Commitment, Employee Information,
Response Plan and Resources



Policy Scope

Labour exploitation is an issue affecting people worldwide, it violates human rights. More action and interventions are required from businesses to fight exploitation and identify whether it is happening within organisations. The Green House Growers is committed to tackling modern slavery and any form of exploitation within our business or in our supply chain.

This policy outlines the steps we take to prevent hidden labour exploitation in our business. Through outlining the responsibilities of our employees, this policy will also provide information on the operational/compliance processes in place to identify risks.

Responding to a modern slavery incident should be treated in the same way as responding to any other emergency within the business. Dealing with a modern slavery incident can be complex and time-consuming so the purpose of this plan is to help address the incident, minimise any adverse consequences, and to ensure the correct reporting procedures are followed so our teams are safe.

As the Commonwealth Modern Slavery Act 2018 Guidance observes, organisations will be able to respond more effectively if they have a pre-agreed process or policy in place to guide its actions.

Defining Labour Exploitation

There are numerous ways that individuals/groups can be exploited. Women, men, and children from differing domestic backgrounds are being subject to labour exploitation, this includes:

- Forced Labour
- Human trafficking
- Debt bondage
- Sexual exploitation
- Domestic servitude
- Organ harvesting
- Criminal exploitation

The Green House Growers acknowledges that the industry in which we operate in is considered high risk, so extra precautions and a detailed response plan have been implemented.

Our Commitment- The Green House Growers Modern Slavery Statement

The Green House Growers Ltd is a reputable grower and supplier of high-quality fresh produce for some of the UK's largest supermarkets as well as local wholesalers and markets.

The Green House Growers Ltd comprises of:

- The Green House Sussex Ltd
- The Green House Norwich Ltd
- The Green House Ely Ltd

Statement Purpose

- Modern Slavery is a term used within the UK and is defined within the Modern Slavery Act 2015.
- The Green House Growers Ltd recognises Modern Slavery is a crime and a violation of fundamental human rights and therefore, continues to adopt a zero-tolerance towards acts of Modern Slavery by establishing and improving systems and processes designed to eradicate all forms of Modern Slavery within the company or within our supply chain. This includes all forms of slavery, servitude, forced and compulsory labour, and human trafficking.

Suppliers and Partners

The Green House Growers Ltd expects all suppliers and partners to fully comply with the Modern Slavery Act 2015 and work towards and uphold similar ethical and moral standards. The Green House Growers Ltd will not knowingly engage or deal with any business involved in slavery or human trafficking.

Action Taken & Procedures in Place

Employee Awareness: As part of the Business Continuity Plan, the Modern Slavery Helpline has been added to the emergency contacts and information for employees has been included in the pre-employment briefing. We have nominated Modern Slavery Champions at each site that are responsible for raising awareness across all levels.

HR Policies and Procedures: We continuously review and update a number of our HR Policies & Procedures associated with eliminating exploitation. In particular we:

- Ensure we adhere to UK right to work checks in respect of recruitment and selection.
- Encourage employees to use our Whistleblowing Policy, in the event they have any concerns about possible acts of Modern Slavery as well as concerns regarding the Company's activities.
- Are committed to the practice of responsible corporate behaviour by having a Corporate Social Responsibility Policy in place, through this the Company seeks to protect and promote the human rights and basic freedoms of all employees and agents.
- Have a written response plan designed to tackle Modern Slavery and Hidden Labour Exploitation.
- Have a written remediation plan and policy.

Ethical Trading

- The Green House Growers Ltd continues to welcome and cooperate with SEDEX by undertaking regular SMETA (Sedex Members Ethical Trade Audit) audits. SMETA is designed to help protect workers from unsafe conditions, overwork, discrimination, low pay and forced labour.
- In addition to this we have an Ethical Trading Policy in place which describes how The Green House Growers Ltd implements The ETI Base Code for all employees and suppliers. The ETI Base Code is an internationally recognised code of good labour practice.

Spotting the Signs

All employees at the Green House Growers are responsible for spotting the signs or indicators of exploitation and reporting these for investigation to the Modern Slavery Lead. According to the Gangmasters Labour Abuse Authority (GLAA), these may include but are not limited to:

- **Restricted Freedom**- relating to travel documents- these could be withheld or false, restricted movement from work and accommodation sites, communication, spending, limited medical access, a lack of food, workers may be subject to violence and potentially controlled by religion.
- **Behaviour and Appearance**- appearing frightened, anxious, scared, nervous, distressed and sustaining any injuries. They may scavenge for food, may feel the need to commit crimes, appear instructed by others or do not speak/have language barriers.
- **Working Conditions** -excessive working hours, no interaction with other employees, no PPE, no contract of employment or no training to be safe in their role.
- **Accommodation**- victims may not know where they are staying, may live in poor conditions that impact welfare or are detrimental to health, and have no choice in who they stay with.
- **Finances**- workers may not receive wages, cannot access their money, are subject to fines, may pay for services that they do not need, be forced to take out loans for others or have money paid into an account that is not their own.

Responsibilities by Role

We have defined our teams' responsibilities to prevent, tackle, report issues and raise awareness of modern slavery and any labour exploitation.

Please note, it is the responsibility of any member of staff that suspects labour exploitation, to report this to the modern slavery lead or an investigating manager.

The following steps have been taken:

- Our Managing Director has been made explicitly accountable for ensuring ethical labour standards are applied throughout our business and that the human rights of all our workers, whether directly or indirectly employed by us, are protected.
- A cross departmental team has been appointed to implement compliance checks to address risks. This consists of our General Managers, the HR team, and all Team Leaders and Supervisors. Specific responsibilities will be highlighted within this policy.
- Our Head of HR is the nominated Modern Slavery Lead across our sites.
- We have a Workforce Incident Management team which consists of trained investigating managers who can respond to reports during operational hours. Our management team will be responsible for fact-finding and conducting investigations in the upmost confidence with the presence of HR. This will then be escalated to the most appropriate route by the HR team. All investigations and claims will be confidential to protect victims.

- Our HR team responsible for delivering the remediation programme for our business with the support of our local GLAA contact.
- Our HR Assistant has been appointed as the Modern Slavery Champion for the Green House Ely and the Administrative Assistant has been appointed as the Modern Slavery Champion at the Green House Norwich. The Welfare and Compliance Officer is also appointed as a Modern Slavery Champion at both Ely and Norwich sites. They are all responsible for raising awareness and maintaining peer engagement at lower levels across our business by providing training to our teams to recognise the signs of exploitation, by speaking openly, sharing stronger together resources and reporting any issues following the response plan.
- Individual roles and responsibilities relating to tackling modern slavery and exploitation have been communicated to relevant colleagues.

Managing Director

- Explicitly accountable for ensuring ethical labour standards are applied throughout the business for all workers direct and indirect.
- To be aware of the recruitment agencies in use within the organisation and to ensure these are regularly audited by the Head of HR.
- To ensure recruitment best practices are always observed.
- To ensure supply chain due diligence checks are completed when entering new business relationships, ensuring that The Green House Growers do not knowingly partner or work with any organisation involved in labour exploitation.
- To ensure any issues brought to their attention are dealt with as per the Green House Growers Response Plan.
- To complete formal training surrounding hidden labour exploitation and to complete refresher training as and when required.
- To encourage a culture of participation and action across all levels of the organisation to prevent modern slavery and mitigate any risk.
- To be aware and to spot the signs that a person is a victim of labour exploitation and report any concerns to the Modern Slavery Lead.

Head of HR and HR Team

The Head of HR is the nominated Modern Slavery Lead for the organisation, ensuring modern slavery and hidden labour exploitation remains at the forefront of the business agenda.

This includes:

- To share information and knowledge across all levels of the business relating to modern slavery.

- To ensure the management team and supervisors have completed formal modern slavery training and refresher training when required.
- To ensure the management team are aware of their roles in the tackling of modern slavery and labour exploitation.
- To liaise with heads of departments to ensure departmental compliance checks are completed and implement any further operational due diligence steps to address risks as required.
- To lead the incident management team, ensuring that employees are aware that they should report any cases and unfair treatment for investigation. Unfair treatment includes, violence, abusive behaviour, bullying, bribery, corruption, discrimination, harassment, victimisation, modern slavery and any other exploitation.
- The Head of HR should assume the role of investigating manager when any issues are brought to their attention, escalating to the most appropriate route as required i.e., GLAA, the Police and any other organisation supporting victims of exploitation.
- To practice confidentiality at all times.
- To ensure the Responsible Recruitment Policy is adhered to at all times.
- To audit our labour providers regularly, holding meetings to review practices and processes and ensure they adhere to the Stronger Together good implementation checklist.
- To be responsible for sourcing and engaging with new labour suppliers, conducting all relevant checks before engaging.
- To ensure managers and supervisors have completed anti-bribery and corruption training and that this is adhered to and complied with in all working practices.
- To review the organisation's Anti-Bribery and Corruption Policy as and when required.
- To support the management team to ensure that the Anti-Bullying and Harassment Policy is always adhered to across the business, making employees aware such behaviour is prohibited and may result in disciplinary action.
- To be the site point of contact for welfare complaints and issues. To ensure complaints are resolved and documented.
- To review modern slavery policies and activity to seek opportunities for improvement.
- To ensure all new starters receive a full induction.
- To ensure that new starters bank details/accounts are in the employee's name.
- To ensure that worker documents are provided to workers in their first/native language.
- To ensure passports are returned straight to the employee and not held once they have been verified in the right to work process.

- To ensure emergency contact details are provided and to investigate trends in groups supplying the same contact.
- To support employee welfare and escalate any payroll queries.
- To support in conducting random checks to ensure workers understand hidden labour exploitation and forced labour risks, how to spot the signs and how to respond.
- To conduct checks when groups of workers rent from one landlord and act accordingly on the information.
- To raise awareness of hidden and forced labour exploitation across junior levels of the organisation, increasing engagement and stressing its importance.
- To ensure Team Leaders and Supervisors can spot the signs and report suspected cases.
- To spot check posters and leaflets on display across site to ensure correct information is available to workers (Stronger Together, See Hear Speak Up, ASDA Ethics Hotline and internal welfare list).
- To give detailed updates in employee voice meetings regarding modern slavery to ensure it remains relevant and live within our workforce.
- To ensure Supervisors are competent in modern slavery prevention processes.
- To be the main point of contact for complaints regarding accommodation sites and to resolve these in a timely fashion, keeping records of actions and interventions required.
- To audit accommodation to ensure it adheres to ethical standards and that the processes and amenities in place put the welfare of our workers first.
- To meet regularly with accommodation providers to collaborate on modern slavery and hidden labour exploitation to address any risks/activities.
- To check suggestion boxes daily and keep records of actions taken.

Site Operations/General Managers

- To be actively supporting the Head of HR in the role of site Modern Slavery Lead by ensuring ethical labour standards are applied across the site for all workers direct and indirect.
- To be aware of the recruitment agencies used on site and to ensure recruitment best practices are always observed.
- Ensure appropriate due diligence has been conducted for on-site contracting Companies to ensure they are working with established ethical labour standards (ETI base code).
- Confirm that on-site contractors have policies and practices in place to identify victims within their own workforce.

- To ensure supply chain due diligence checks are completed when entering new business relationships, ensuring that The Green House Growers do not knowingly partner or work with any organisation involved in labour exploitation.
- To ensure any issues brought to their attention are dealt with as per the Green House Growers Response Plan.
- To complete formal training surrounding hidden labour exploitation and to complete refresher training as and when required.
- To encourage a culture of participation and action across all levels of the organisation to prevent modern slavery and mitigate any risk.
- To be aware on how to spot the signs that a person is a victim of labour exploitation and report any concerns to the Modern Slavery Lead/HR.
- To ensure working environments are safe and where applicable, covered by the relevant security fittings. i.e., CCTV.

Packhouse Manager, Team Leaders, and Supervisory Roles

- To spot indicators as listed above that someone is a victim and report this to your Modern Slavery Lead for investigation.
- To ensure that anti-bullying and harassment, anti-bribery and corruption policies are adhered to in the way that you conduct yourself and manage others at work.
- To ensure fair and equal treatment of all our workers whether direct or indirect, including adequate rest breaks, management of welfare facilities and working hours.
- To ensure health, safety and hygiene protocols are adhered to so that there is a safe environment for all our workers whether direct or indirect.
- To deliver inductions to new starters ensuring all workers understand the content that is being delivered using resources in the appropriate language.
- To conduct right to work checks during the induction process.

Finance Team

- To ensure all bank accounts are in the name of the worker themselves following bank verification procedures. This ensures individuals receive their own payments for work and are not victims of any financial abuse.
- To ensure that anti-bribery and corruption policies are adhered to in relation to financial activity.
- To raise or flag any concerns relating to our suppliers or their activities relating to labour exploitation to HR/the Investigating Team. Take particular care when liaising with high-risk

industries such as agriculture, construction, food manufacturing and hospitality to increase supply chain due diligence in these areas.

- To ensure all staff are paid in a timely manner and any queries are dealt with promptly, escalating any concerns to the Head of HR.
- To spot any suspicious transactions and report these as soon as possible.

Technical Manager

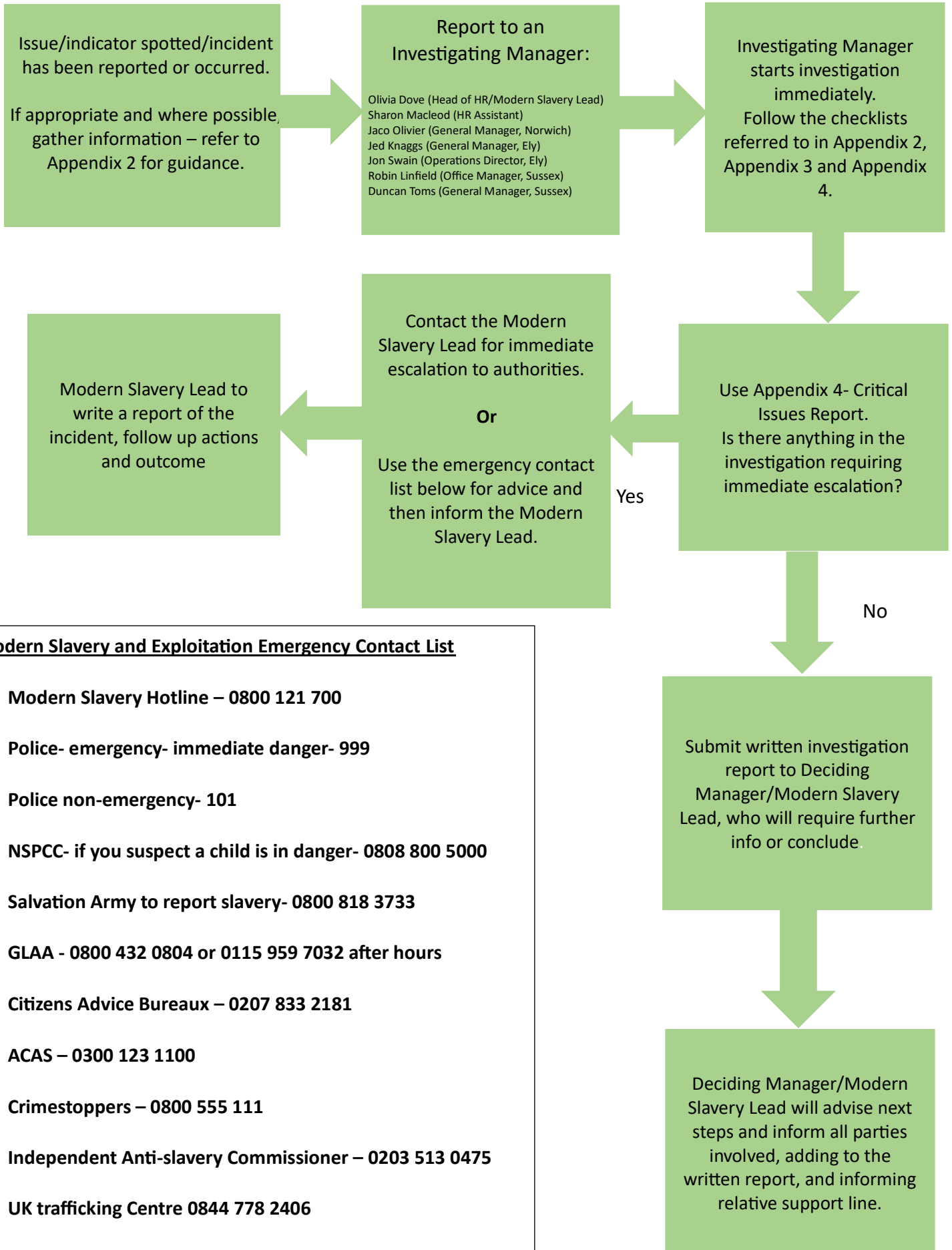
- To identify any modern slavery risks and work alongside Head of HR and Senior Management team to ensure these are mitigated.
- To provide support and direction to teams to ensure the company is compliant with legislation relating to modern slavery.
- To ensure ethical trading and adherence to the Company's CSR policy.
- To be able to communicate our modern slavery policy to our customers and stakeholders.
- To support sites with ethical audits (SMETA, Red tractor, BRC, LEAF and any Customer Audits).

Commercial

- To ensure supply chain due diligence checks are completed when entering new business relationships, ensuring that The Green House Growers do not knowingly partner or work with any organisation involved in labour exploitation. Inform the Modern Slavery Lead at your site of any new relationships.
- Report any suspected cases in the supply chain to the Head of HR/Modern Slavery Lead and Managing Director for an investigation.
- As a supplier to retailers, be familiar with Stronger Together, GLAA and BRC "Protocol for Handling Reported Cases of Modern Slavery in the UK Supply Chain Advisory Document for retailers" (Please see Appendix 1).



Responding to a Modern Slavery/Exploitation Incident



Modern Slavery and Exploitation Emergency Contact List

- **Modern Slavery Hotline – 0800 121 700**
- **Police- emergency- immediate danger- 999**
- **Police non-emergency- 101**
- **NSPCC- if you suspect a child is in danger- 0808 800 5000**
- **Salvation Army to report slavery- 0800 818 3733**
- **GLAA - 0800 432 0804 or 0115 959 7032 after hours**
- **Citizens Advice Bureaux – 0207 833 2181**
- **ACAS – 0300 123 1100**
- **Crimestoppers – 0800 555 111**
- **Independent Anti-slavery Commissioner – 0203 513 0475**
- **UK trafficking Centre 0844 778 2406**
- **UK Slavery Helpline- 0800 012 1700**

Supporting and Assisting Victims of Modern Slavery and Exploitation

To support victims, we will ensure to:

- Build trust with victims and ensure law enforcement teams will be able to support them.
- Arrange medical care if required.
- Separate victims so investigating managers can get information and statements, this will also ensure potential suspects are separated.
- Be considerate of religion where applicable.
- Connect victims with charities to ensure they get professional support.
- Get consent to enter the National Referral Mechanism- this is Government set up and allows the Home Office to collect data about victims.
- Collect evidence where possible.
- Contact police and GLAA whenever you suspect there are victims of exploitation or escalate to the Modern Slavery Lead to do so.

Guidance to employees: Do not treat victims as suspects or expect victims to be able to divulge information straightaway, they may be shocked or frightened. If you are not the investigating manager, do not attempt to investigate or take statements from the victims.

Charities Providing Support

We will provide victims with details of charities providing further support. The charities we will refer victims to include:

- **Hope for Justice**- Call: [\(+44\) 0300 008 8000 \(local rate call\)](tel:+4413000088000) Email: info.uk@hopeforjustice.org
Office Hours: Monday to Friday, 9am – 5.30pm (UK time)
For advice and queries around survivors' care: advocacy.advice@hopeforjustice.org
- **The Salvation Army**- confidential 24/7 referral helpline on 0800 808 3733.

Information for employees: What happens next?

The National Referral Mechanism (NRM) is a framework that enables the Home Office to identify modern slavery victims to ensure they receive appropriate support. The victim must consent to be a part of this referral process and this referral will only be made by designated organisations, these are predominantly the local authorities and charities that you would be reporting suspected cases to.

The support available includes legal advice, accommodation, protection and emotional support. For the region of East Anglia, this will be provided by the Salvation Army.

After a case has been reported The Single Competent Authority, who are a part of the Home Office, will review the information and will make a decision on Reasonable Grounds. The test for reasonable grounds is “suspect but cannot prove”.

The decision process aims to conclude in a week and could be as follows:

- Positive decision- eligible for support.
- Negative decision- more evidence can be provided, and an application can be made to reconsider.

APPENDICES

APPENDIX 1- Stronger Together Resources: Retailer Protocol for Handling Reported Cases of Modern Slavery in the UK Supply Chain

Source- Stronger Together, BRC and the GLAA.

The Green House Growers do not own this content.



Retailer Protocol for Handling Reported Cases of Modern Slavery in the UK Supply Chain

Advisory Document

Purpose and Use

- 1.1. This document establishes principles of good practice and a procedural protocol for retailers in responding to reported cases of forced labour, human trafficking, debt bondage and other forms of modern slavery in their UK supply chain.
- 1.2. The purpose of this protocol is to drive consistent application of good practice in the processes that retailers apply in handling reported cases of modern slavery that occur in their UK supply chain. It establishes a mechanism to incorporate lessons learnt from actual identified cases to develop this good practice and to establish similar processes in other country supply chains.
- 1.3. The status of this document is advisory. BRC recommends that its members and other brands and retailers adopt the principles. BRC invites retailer members to commit to adopting these principles.
- 1.4. The UK supply chain refers to goods for resale and not for resale suppliers, logistics and distribution companies, service providers, contractors, and labour providers at all levels of the supply chain (collectively referred to as 'suppliers'). Relevant retailers, as referred, are those retailers supplied by the particular supplier.
- 1.5. The BRC, Gangmasters and Labour Abuse Authority (the GLAA) and Stronger Together have jointly prepared these principles and protocol in collaboration with retailer and supply chain representatives and welcome comment and input to further refine and improve this good practice guidance. BRC will review this guidance at least annually as part of the BRC Better Retail Better World programme and GLAA Supplier/Retailer Protocol engagement.

2. Principles

- 2.1. Retailers will recommend that their UK supply chain businesses attain an understanding of how modern slavery occurs in supply chains and an awareness of the indicators of forced labour. Suppliers should also build internal capacity and implement good practice through a due diligence approach to

detect, deter and deal with this hidden form of worker exploitation. Retailers will encourage their suppliers to utilise the resources of the GLAA, Ethical Trading Initiative, Stronger Together, trade associations and other training and awareness initiatives to comply with the requirements of the Modern Slavery Act and GLAA licensing standards

2.2. Retailers recognise that those who become victims of modern slavery are made vulnerable to exploitation and abuse as a result of poor business practices or through criminal gangs. Individuals may also attempt to place victims into legitimate supply chains and businesses for the purposes of exploitation through forced labour, control of their bank accounts and/or withholding of personal documents.

2.3. Retailers will promote to their UK supply chain that where indicators of modern slavery are identified within their business or elsewhere, suppliers should report this to the GLAA via <http://www.gla.gov.uk/contact-us/> and/or Modern Slavery Helpline at the earliest possible stage, for advice on next steps.

2.4. Retailers recognise that the safety of the individuals is the first priority. Retailers accept that for suppliers to better protect the safety of individuals and not prejudice inquiries and potential prosecutions, their supply chain will maintain confidentiality over all information relating to the incident until advised by the appropriate authority.

2.5. Retailers will only expect their supply chain to inform them about a potential case of modern slavery within their business once authorised to do so by the appropriate UK authority such as the police or GLAA. Suppliers should actively seek approval from the relevant authority to inform their customers about a potential incident.

2.6. Where a supplier has alerted their customers; is cooperating with authorities; is actively implementing corrective actions and is not found to be complicit, retailers commit that there will be no standard policy to immediately delist or suspend trade with that supplier because of that specific reason. Instead investigation will take place alongside engagement with the supplier to assess next steps that need to be taken. Retailers will ensure internal coordination to ensure consistency of message and action between all departments such as ethical trade, procurement/buying, legal, PR etc.¹

2.7. If a supplier has not, or is not cooperating with authorities, is failing to implement required corrective actions, or is found to be complicit in the offence, the GLAA will contact the retailers to advise them of the situation. The retailers may then individually decide to take appropriate commercial actions including suspending trade or delisting the supplier.

2.8. Suppliers will be encouraged to develop Standard Operating Procedures and Incident Control Procedures for reporting occurrences of modern slavery within their business².

2.9. Retailers accept that the GLAA will not exceed its own legal powers or act unlawfully and that it will manage its communications in accordance with its External Communications Policy and the GLAA Supplier/Retailer Protocol.

¹ BRC foresees no competition law issues with this Protocol, however it is the responsibility of each individual company to determine its own legal risk

² Further advice can be found in the Stronger Together [Tackling Modern Slavery in UK Businesses Toolkit - Stronger Together \(stronger2gether.org\)](https://www.stronger2gether.org/)

3. Procedural Protocol

3.1. The GLAA will, on request from the supplier within whose business the matter has occurred, issue to that business an email stating that it may now report that matter to its retailer and/or supplier clients. This will include a statement, where appropriate (i.e. unless the company is under investigation for the offence), that the supplier is cooperating fully with the appropriate authorities. If the supplier has been identified as uncooperative the action in 2.7 will be taken instead.

3.2. The supplier will determine how it wishes to communicate the matter to its retailer and/or supplier clients. This may vary depending on the facts of the case, but the recommended approach is a single email to all clients to ensure consistency of message and timing. This email should include a summary of facts with the timeline of events as may be released by the supplier.

3.3 Following receipt of this email, relevant retailers will aim to collaborate in their response rather than pursuing individual and duplicating activity. Such collaboration may be facilitated by an agreed third party. Alternatively, the relevant retailers will agree and appoint a 'lead retailer' to be the key coordinating point of contact with the supplier, assuming the supplier is willing to disclose its customers.

3.4. The objective of collaboration is to reduce duplication of activity and unnecessary burden for the supplier and retailers; promote good practice and efficiency in resolution of issues; provide confidence and assurance, or otherwise, to all relevant retailers that the supplier has the matter in hand.

3.5. The supplier should organise calls at the earliest convenience with its representatives, marketing agencies, labour provider (where appropriate), relevant retailers, and GLAA (subject to resources). The supplier may consider joint conference calls to ensure consistency of the information it provides to other organisations. Such calls to include:

3.5.1. Recount of facts and timeline

3.5.2. Supporting facts from GLAA

3.5.3. Questions and discussion

3.5.4. Appointment of 'lead' retailer if not done so already and deemed to be necessary

3.5.5. Agreement on next actions, including media engagement where necessary

3.5.6. On closure of call, email from supplier to confirm above and to contain initial Action Plan or post incident review which highlights gaps in process, root cause and corrective action required by the supplier, labour provider etc.

3.6. The 'lead' retailer will:

3.6.1. Coordinate any retailer only conference calls and/or meetings on the matter, promoting appropriate confidentiality with regard to information shared;

3.6.2. Coordinate conference calls and/or meetings on the matter with the supplier and other retailers. These calls would cover if deemed appropriate: actions and information expected from a supplier at what points; organise, including confirmation of funding, and appoint a specialist/auditor to coordinate a social compliance audit/investigation (such audits should not

occur whilst the criminal investigation phase is active and only after the GLAA has advised that it is appropriate to do so without risk to the investigation) and to receive and disseminate subsequent reports; provision of support, as may be deemed necessary or helpful for the supplier; discussions on remediation and lessons learned. The lead retailer will not be empowered to make binding decisions creating commercial impacts. Information provided in confidence by the supplier will be treated as such by all parties and will not be shared beyond the relevant retailers, the BRC or the appointed social compliance specialist/auditor without the explicit approval of the supplier.

3.7. The BRC will coordinate any media release on behalf of, and in agreement with, the retailers, collaborating with the GLAA, the supplier, retailers and others as may be relevant. Where suppliers lead on media communications, retailers will offer support. BRC and GLAA will appropriately reflect the positive contribution made by suppliers who have identified issues within their business and engaged appropriately with the enforcing authorities.

3.8. Any feedback or complaint by a supplier on the application of this protocol may be made either to the lead retailer or to the BRC Sustainability Policy Adviser, as the supplier deems appropriate. A formal response will be provided where one is requested.

APPENDIX 2- Information Checklist for when referring to Law Enforcement Agencies

Source- Gangmasters & Labour Abuse Authority; Labour Exploitation; Spot the Signs

- Detailed account/description of those involved.
- Where the victims are working and living.
- Any other location mentioned in conversation or somehow relevant.
- Methods used to control or manipulate any victims.
- Length of time this has been happening for.
- Details of transportation.
- Financial information if relevant.
- Documents, any letters, and/or identification.
- Method of recruitment.
- National ties.
- Relations of the exploiter/ with the exploiter.

APPENDIX 3- Workplace Incident Investigation Checklist

Source- Stronger Together Resources

Workplace Incident Investigation Checklist

NB. This is a template checklist to be used to monitor and verify all the required steps of a workplace incident investigation have been completed.

Investigator Name

Job Title

Investigation Title

Investigation Description

ACTION		√	INITIALS
Prior to commencement of investigation			
1	The investigating manager confirms that s/he has the knowledge and skills required to carry out the investigation in a timely, professional and unbiased manner.		
2	Appropriate business policies and procedures, e.g., Health and Safety, Responsible Recruitment, Disciplinary, Grievance, Staff Handbooks etc. have been reviewed to determine whether they offer guidance or direction to the investigation. Consult with HR specialist if required.		
3	Identify what evidence might need to be gathered and how to get it, e.g., CCTV footage or recordings, emails or other documents and witness statements.		
4	Identify the “Deciding Manager” who will receive the Investigation Report and who will determine the outcome and remediation based upon the findings.		
5	Identify all witnesses and others (such as technical experts, who are not directly involved but can add insights) who will need to be interviewed, and in which order, and prepare an outline of questions to ask each individual.		
6	Map out a timetable for the investigation and report writing to ensure that the process is conducted in a timely manner that best serves the particular circumstances of the matter.		
7	If a worker is under investigation, inform them of the issue for which they are under investigation, the date on which the investigatory meeting will take place, their right to be accompanied and ensure they have a copy of the relevant procedures.		
Handling an investigation meeting			
8	Arrange interpretation to support communication, where necessary. Any interpreter should have the knowledge and skills and/or have received training to provide accurate interpretation (relay only what has been said by each party) and remain independent (in no way influence the conversation).		
9	Invite HR/staff member or other manager to the meeting to take notes and assist with investigation.		
10	Prepare a set of questions based on the evidence and information available.		
11	Interview individuals in a location free from interruptions, e.g., phone calls, where the interview will be kept confidential and where individuals feel comfortable.		
12	Introduce those present and outline their roles.		
13	Inform the interviewee of the incident under investigation for which the investigation is necessary.		
14	Confirm that copies of the statement and/or notes will be issued to the other parties involved in the case.		
15	Where appropriate, offer the witness the opportunity to write a statement of events (or write on their behalf) using the Investigation Statement/Notes form (see later in this Appendix). Ensure completion is in ink, that amendments are initialled (do not use correction fluid), draw a line through unused parts of the form and ensure that each page is signed and dated.		
16	Where a statement of events is not appropriate, conduct the meeting asking relevant questions and noting answers.		



17	If necessary, adjourn the meeting. Review the evidence highlighting any issues that are vague or incomplete. Update the prepared list of questions and reconvene the meeting. Repeat this step until you are satisfied that you have all the relevant information from the interviewee.		
18	Ask any final questions and allow the interviewee to add any other comments to the investigation.		
19	Summarise the discussion, gain agreement to this and conclude the investigation meeting.		
20	Prepare the witness statement/notes and ensure that they are read and signed by the interviewee to signify that they are accurate. Ensure that the interviewee has a copy.		
Concluding the investigation			
21	Collect and review witness statements and interview records.		
22	Collect and review any relevant written records and documents, e.g., timesheets, meeting notes, maintenance records and accident reports.		
23	Collect and review any relevant and lawfully gained physical evidence such as CCTV, telephone records or results of searches.		
24	Consider what the evidence reveals. Determine whether there is a need to gather further evidence, conduct additional interviews or whether the investigation can be concluded.		
Writing an investigation report			
25	Determine whether the report is to be written only to present the investigation evidence and findings or whether it will also include recommendations on proposed outcomes, actions and remediation.		
26	Collate all the evidence collected into a structured report. Findings and conclusions should be evidence-based and balanced, showing all sides of the arguments.		
27	Recommendations should be proportionate and consistent, and in accordance with the established procedures. When making decisions based on evidence, specify whether the burden of proof is “on the balance of probabilities” or “beyond reasonable doubt”. Explain how the evidence leads to the recommendations and any mitigating circumstances that have been taken into account.		
28	Decide on your recommendation (action) based upon the evidence. This could be no action necessary, changes to policies or procedure, staff training (or retraining), communication (or re-communication) of requirements, further investigation, or disciplinary action. Decide on your remediation (i.e. putting right the wrongs for any victims or individuals adversely affected) such as an apology or compensation. Determine actions to prevent a reoccurrence.		
Acting on the investigation report			
29	On receiving and reviewing the Investigation Report, the Deciding Manager will decide whether to accept the report, ask further questions of the Investigating Manager, require the Investigating Manager to conduct further interviews and evidence collection and submit the additional findings, or reject the Investigation Report and require a new Investigating Officer to be appointed to conduct a fresh investigation.		
30	Having accepted the Investigation Report as concluded, the Deciding Manager will decide whether to accept the recommendations (action) or the remediation, and actions to prevent a reoccurrence or if these should be modified in any way.		
31	The Deciding Manager will inform all relevant parties of the recommendations (action), the remediation and actions to prevent a reoccurrence.		
32	On request, the Investigation Report and all evidence should be made available to the complainants who may determine that they wish to appeal the decision, or propose additional or alternative actions, remediation, and steps to prevent a reoccurrence.		
33	If appealed, the appellant should be given opportunity to present their case to a new and unbiased Deciding Manager. The new Deciding Manager will determine whether further investigation, interviews and evidence-gathering are required. The new Deciding Manager will decide whether to uphold the original decision and recommendations (action) or the remediation, and actions to prevent a reoccurrence or to reverse them, modify or add to them. The new Deciding Manager will inform all relevant parties as required.		
34	Internal procedures will determine whether there is a further right of appeal.		

Investigation Statement/Notes Form

Description of case under investigation:			
Interviewee's name		Meeting date	
Incident date and time		Meeting time	
Others present at the meeting			

If making a statement of events, please relate the incident step by step and state in your own words what happened and what you saw and heard, including names of any people who were there. Include dates and times.

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To the best of my knowledge, this statement is a full, accurate and true accounts in all respects. I understand that knowingly making a deliberately false or misleading statement will render me liable to disciplinary action.	
Signed	Date

APPENDIX 4- Workplace Critical Issues Report

Source- Stronger Together

Workplace Critical Issues Report For indicators of Potential Forced Labour, Hidden Exploitation/Mistreatment and Suspicious Trading Activity

This form is a summary record for when it is suspected that an applicant or job holder is a victim of trafficking, forced labour or other third-party work related exploitation. Any notes made will supplement this record.

Business Name:	Site name (if different)
Organisation owner:	
Auditor Name:	Organisation:
Mobile No.:	Email:

Indicators of Potential Forced Labour	Evidence (Tick)	No Evidence (Tick)	Details/Reference
Worker(s) were deceived about the nature of the job, location, employer or earnings	<input type="checkbox"/>	<input type="checkbox"/>	
Worker(s) have paid someone during recruitment for the job or work	<input type="checkbox"/>	<input type="checkbox"/>	
Worker(s) cannot leave the job without repaying money owed (e.g. recruitment or visa fees)	<input type="checkbox"/>	<input type="checkbox"/>	
Worker(s) cannot leave accommodation without repaying money owed (e.g. illegitimate or extortionate rental charges) *NB standard rental contracts will have clauses stating a minimum notice term that if broken will cause a financial penalty to be incurred	<input type="checkbox"/>	<input type="checkbox"/>	
Control	Evidence (Tick)	No Evidence (Tick)	Details/Reference
Another person is in control of worker(s) passport / ID / personal documents	<input type="checkbox"/>	<input type="checkbox"/>	
Another person is in control of worker(s) bank account	<input type="checkbox"/>	<input type="checkbox"/>	
Another person is in control of worker(s) mobile phone	<input type="checkbox"/>	<input type="checkbox"/>	
Another person is in control of worker(s) payslips	<input type="checkbox"/>	<input type="checkbox"/>	
Isolation	Evidence	No Evidence	Details/Reference
Worker(s) cannot leave their accommodation of their own free will	<input type="checkbox"/>	<input type="checkbox"/>	
Worker(s) do not possess their own accommodation keys	<input type="checkbox"/>	<input type="checkbox"/>	



Worker(s) are not in control of their own travel to work arrangements	<input type="checkbox"/>	<input type="checkbox"/>	
Worker(s) are unable to speak to family / friends	<input type="checkbox"/>	<input type="checkbox"/>	
Worker(s) appear withdrawn / demonstrate minimal engagement with peers	<input type="checkbox"/>	<input type="checkbox"/>	
Physical signs of violence / intimidation	Evidence	No Evidence	Details/Reference
Worker(s) report actual or threats of physical/psychological/sexual violence or intimidation	<input type="checkbox"/>	<input type="checkbox"/>	Requires immediate escalation
There are visible physical expressions of psychological trauma, fear or anxiety (e.g. worker(s) avoid eye contact, are unable to express themselves, appear frightened / stressed / agitated / confused)	<input type="checkbox"/>	<input type="checkbox"/>	
Worker(s) report actual violence or threats made to family / friends / others	<input type="checkbox"/>	<input type="checkbox"/>	Requires immediate escalation
Visible injuries potentially as a result of assault or controlling measures	<input type="checkbox"/>	<input type="checkbox"/>	
Worker(s) appear malnourished, dishevelled, dirty, unsuitably clothed	<input type="checkbox"/>	<input type="checkbox"/>	
Excessive Working	Evidence	No Evidence	Details/Reference
Worker(s) report they are expected, coerced, forced to work excessive hours / overtime / days off against their wishes	<input type="checkbox"/>	<input type="checkbox"/>	
Worker(s) report they are threatened, bullied, coerced to do unreasonable work against their wishes	<input type="checkbox"/>	<input type="checkbox"/>	
Personal Records 'Alert Flags'	Evidence	No Evidence	Details/Reference
Bank accounts identify unrelated workers paid into one account	<input type="checkbox"/>	<input type="checkbox"/>	
High occupancy addresses or common workers' landlord	<input type="checkbox"/>	<input type="checkbox"/>	
Shared or sequential mobile phones	<input type="checkbox"/>	<input type="checkbox"/>	
Same next of kin/emergency contact numbers	<input type="checkbox"/>	<input type="checkbox"/>	
Same place of origin/location in home country	<input type="checkbox"/>	<input type="checkbox"/>	
Other concerning recruitment/employment data (e.g. shared start dates, application forms / recruitment tests completed in the same handwriting)	<input type="checkbox"/>	<input type="checkbox"/>	

Personal Records 'Alert Flags'	Evidence	No Evidence	Details/Reference
Bank accounts identify unrelated workers paid into one account	<input type="checkbox"/>	<input type="checkbox"/>	
High occupancy addresses or common workers' landlord	<input type="checkbox"/>	<input type="checkbox"/>	
Shared or sequential mobile phones	<input type="checkbox"/>	<input type="checkbox"/>	
Same next of kin/emergency contact numbers	<input type="checkbox"/>	<input type="checkbox"/>	
Same place of origin/location in home country	<input type="checkbox"/>	<input type="checkbox"/>	
Other concerning recruitment/employment data (e.g. shared start dates, application forms / recruitment tests completed in the same handwriting)	<input type="checkbox"/>	<input type="checkbox"/>	
Indicators of Workplace Exploitation/Mistreatment	Evidence	No Evidence	Details/Reference
Worker(s) reports other criminal human rights violations (e.g. sexual assault or exploitation, work place bribery, hate crime)	<input type="checkbox"/>	<input type="checkbox"/>	
Workers are paid by cash rather than into a bank account	<input type="checkbox"/>	<input type="checkbox"/>	
There is no clear time worked recording system and/or pay calculation	<input type="checkbox"/>	<input type="checkbox"/>	
There is insufficient evidence that the national minimum wage is paid	<input type="checkbox"/>	<input type="checkbox"/>	
Evidence of use of worker(s) without legal authority to work in the UK	<input type="checkbox"/>	<input type="checkbox"/>	
Evidence of child work and/or child labour	<input type="checkbox"/>	<input type="checkbox"/>	Requires immediate escalation
No grievance and/or anonymous whistleblowing mechanisms are in place to enable workers to report mistreatment or concerns	<input type="checkbox"/>	<input type="checkbox"/>	
Access to remedy notices are removed / workers are instructed not to inform	<input type="checkbox"/>	<input type="checkbox"/>	
Worker(s) are not permitted to join / form trade unions of their own choosing	<input type="checkbox"/>	<input type="checkbox"/>	
Worker(s) have not been provided with a contract	<input type="checkbox"/>	<input type="checkbox"/>	
Evidence or indicators of systemic non-payment of holiday pay	<input type="checkbox"/>	<input type="checkbox"/>	
Evidence or indicators of systemic non-payment of statutory benefits	<input type="checkbox"/>	<input type="checkbox"/>	

Indicators of Criminal/Suspicious Trading Activity	Evidence	No Evidence	Details/Reference
Evidence that work is deceptively subcontracted	<input type="checkbox"/>	<input type="checkbox"/>	
Suspicious activity related to Company Directors	<input type="checkbox"/>	<input type="checkbox"/>	
Suspicious activity related to Company's trading history (e.g. phoenixing)	<input type="checkbox"/>	<input type="checkbox"/>	
Suspicious activity related to payment/reporting of taxes (employee and VAT)	<input type="checkbox"/>	<input type="checkbox"/>	

Additional details regarding Potential Critical Issues:

Supporting information providing background on how the information was gathered:

Where a worker(s) has reported issues, have they consented to provide you with their contact details?
 Yes No
 Contact name:
 Safe contact details – Personal mobile number: Personal email:
 UK current address:
 Please detail the safe means of contacting the individual:
 Nationality: English spoken: Good / Basic / Minimal / None
 Interpreter needed: Yes No If Yes, details of individual/service used

Action taken by Auditor

Authority / Body informed: By who:

Gangmasters and Labour Abuse Authority notified (0800 432 0804)

Police (Non-emergency 101 / Emergency 999)

Modern Slavery Helpline advice sought / notified (08000 121 700)

Salvation Army advice sought / notified (0300 303 8151)

Auditor: **Signature:** **Name**

Response Decision and Action (To be completed by the Brand)

Monitor CAP response and re-audit	<input type="checkbox"/>
Call business owner to formal meeting	<input type="checkbox"/>
Recommend ending supply relationship	<input type="checkbox"/>
Notify Police / GLAA	<input type="checkbox"/>

Decision/Rationale/Other Actions/Comments:

Internal Notification Dates: Media Team Buyers Legal

Authorising Manager Name: **Job title:** **Signature:**

Owner (name / job title):	HR Team
Approved By (name / job title):	Richard Diplock, Managing Director Rik Leerdam, Managing Director
Revision Due Date	31/07/2025