Template Policy “Tackling Modern Slavery and Hidden Labour Exploitation”

Policy Statement

1. Recruitus 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.
2. **Modern slavery** is a broad term used to encompass offences that involve one person depriving another person of their liberty, in order to exploit them for personal or commercial gain.
3. **Forced labour** is all work or service that is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily.
4. **Debt-bonded labour** is where a person’s labour is demanded as a means of repayment for a loan or service.
5. **Human trafficking** is the recruitment and transportation of persons by threat, force, coercion or other abuse of power or vulnerability to achieve the consent of a person having control over another person for the purpose of exploitation.
6. **Hidden labour exploitation** is action up to and including modern slavery which involves the exploitation of workers and job applicants by internal or external individuals without the sanction or explicit knowledge of the employer or labour provider.

Scope

1. *To which site(s) does this policy apply?*

Responsibility

1. *Who has overall responsibility for this policy?*

Policy Commitments

Recruitus shall:

*(refer to the detail in the Good Practice Implementation Checklists, Response and Remediation sections in this toolkit in developing your specific commitments)*

1. ***A. COMMITMENT to tackle modern slavery risks within your business***
   1. *Define all roles and responsibilities for tackling modern slavery risks within your business*
   2. *Detail the training that your business undertakes to build capacity and capability to prevent and address modern slavery risks*
   3. *Refer to the management systems that your business has developed and implemented to prevent and address modern slavery risks at your site, including Anti-Bribery and Corruption Policy, Responsible Recruitment Policy, Recruiter Compliance Principles, Serious Workforce Incident Procedure, Workplace Incident Investigation Checklist, Workplace Critical Issues Report, Worker Questionnaire, Worker interview questions and others as required.*
2. ***B. ASSESSMENT of modern slavery risks within your business***
   1. *Outline your methodology and process to map, understand and prioritise modern slavery risks within your business with regards to direct workers, agency workers and on-site contractors.*
3. ***C. ACTION to prevent and deal with identified risks of modern slavery within your business***
   1. *Outline your actions to ensure ongoing Workforce Awareness Raising and Engagement to prevent and deal with identified risks of modern slavery*
   2. *Outline your actions to ensure ongoing Supervisor/Team Leader/Support Staff Engagement to prevent and deal with identified risks of modern slavery*
   3. *Outline your good practice in the recruitment of directly employed workers to prevent risks of modern slavery*
   4. *Outline how you proactively analyse worker records for modern slavery “Alert Flags”*
   5. *Outline your good practice in your engagement with labour providers with regards to the recruitment and use of agency workers on your site to prevent risks of modern slavery*
   6. *Outline your good practice in your engagement with contracting companies with regards to the recruitment and use of contractors on your site to prevent risks of modern slavery*
   7. *Outline the systems that your site has in place to effectively enable reporting of potential indicators of modern slavery.*
4. ***D. RESPONDING to protect and provide remedy for victims of modern slavery within your business***
   1. *Refer to your “Response Plan” which details how your business will ensure that it responds effectively to potential indicators of modern slavery to safeguard and provide appropriate support to victims*
   2. *Refer to your “Remediation Policy” which details how your business will enable victims to receive relevant information, access to justice and reparation for harm suffered, with the objective of restoring individuals to the situation in which they would have been, had the impact not occurred.*
5. ***E. MONITOR progress to prevent, respond to and remediate the risks of modern slavery within your business***
   1. *Outline your processes to monitor the progress made to prevent, respond to and remediate the risks of modern slavery within your business with regards to direct workers, agency workers and on-site contractors*
   2. *Specify your process for ongoing continuous improvement and for formally reviewing all procedures and arrangements at least on an annual basis.*
6. ***F. COMMUNICATE the steps that you have implemented to prevent, respond to and remediate the risks of modern slavery within your business***
   1. *Detail how your business communicates its efforts to prevent, respond to and remediate modern slavery risks and the effectiveness of these to relevant stakeholders*
   2. *Where your business produces a Modern Slavery Statement, detail your commitment to be open and transparent and to report in line with recognised good practice.*