



Autoclenz Holdings Ltd

Policy for Preventing Hidden Labour Exploitation: Tackling Modern Slavery in our Business and Supply Chain

Policy Statement

Autoclenz commits to developing and adopting a proactive approach to tackling hidden labour exploitation by introducing management practices to deter, detect and address any form of modern slavery i.e. forced, bonded and human trafficking.

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 of themselves as such, reluctant to come forward.

Autoclenz recognise the volume of lower-skilled jobs in the valeting industry can provide an opportunity for unscrupulous individuals and agencies to put people into forced or bonded labour. As such, we have conducted a modern slavery and human trafficking workshop to raise awareness, share best practice and develop practical solutions to tackle the risk of human trafficking and modern day slavery within our business.

Coverage

This policy applies to all companies within Autoclenz Holdings Ltd

Responsibility

Trevor Clingo, Director is responsible for implementing and overseeing the policy.

It is the responsibility of all employees to read and understand the policy and their obligations.

Regional Managers and Heads of Business are responsible for ensuring that sub contractors on site are those that have signed an Agreement for Services and reporting suspected cases of modern slavery. Trevor Clingo is responsible for ensuring efforts are made to investigate and remediate the risk of modern slavery in the business. John Watson, SHEQ Manager, is responsible for supply chain risk assessment and audit. Martin Ward is responsible for ensuring efforts are made to ensure that basic labour standards are met and that the business endeavours to pay at least NLW and reflect full and fair labour costs when tendering for business.

Policy Commitments

Autoclenz shall:

1. Designate appropriate managers to attend “Tackling Hidden Labour Exploitation” training and to have responsibility for developing and operating company procedures relevant to this issue.
2. The Company will not use any individual or organisation to source and supply workers without confirming that workers are not being charged a work finding fee.
3. Ensure that all staff responsible for directly recruiting workers are trained on induction and regularly thereafter to be aware of issues around third party labour exploitation and signs to look for and have understood and signed appropriate Recruiter Compliance Principles.
4. Ensure that labour sourcing, recruitment and operator placement processes are under the control of trusted and competent staff members.

5. Adopt a proactive approach to reporting suspicions of hidden worker exploitation to the Autoclenz Head Office.
6. Provide information on tackling “Hidden Labour Exploitation” to our workforce through workplace posters, worker leaflets, induction and E-learning.
7. Encourage workers to report cases of hidden third party labour exploitation, provide the means to do so and investigate and act on reports appropriately.
8. Require labour providers and other organisations in the labour supply chain to adopt policies and procedures consistent with the above. Carry out a diverse programme of announced and unannounced follow-up audits of the supply chain.

Response Plan

1. If suspect behaviour is identified the Regional Manager should inform their Head of Business AND the Director, Trevor Clingo (trevor.clingo@autoclenz.co.uk) to discuss their concerns
2. The Regional Manager should tentatively talk to the individual(s) to try and ascertain if their concerns are valid (refer to Alert Flags)
3. Recognise that individuals at risk need to be protected and supported and appreciate that workers and their families could be in real danger from exploitive individuals or organised criminal gangs. Refer to ‘action to be taken’ below
4. Make a record of any concerns and any evidence to support suspicions which should be captured and protected and shared with Trevor Clingo as it may be needed at a later stage should an investigation be appropriate
5. If, on speaking with the individual(s), and discussing with the Head of Business AND Trevor Clingo, the Regional Managers concerns are suspicious, then Trevor Clingo will contact the relevant authority;

Call 999 in an emergency

Call 101 in a non-emergency

Call the Gangmasters and Labour Abuse Authority (GLAA) on 0800 432 0804 or email intelligence@gla.gsi.gov.uk

Call the Modern Slavery helpline on 0800 0121 700

The action to be taken will depend upon the circumstances which prevail, however:

Remember that your key role is to protect the victim, not to conduct an investigation. Reassure potential victims that their confidentiality will be protected. Offer support and reassurance recognising that these individuals may be psychologically traumatised.

Contact Trevor Clingo at Head Office on 01283 554672 (trevor.clingo@autoclenz.co.uk) who will contact the necessary authority and advise of the next course of action.

Consider whether an interpreter is needed - use only trusted or independent interpreters or the telephone interpreting service ‘Clear Voice’ whose app can be downloaded and provides instant connection to interpreters with access to over 200 languages (download the app, choose the language you need then tap ‘dial’). **NEVER** use other workers who speak the same language.

13th September 2022