



**PRO-FORCE**

WORKING TOGETHER

## Modern Slavery Statement



## Modern Slavery Statement

*"Pro-Force's strategic aim is to lead the industry for compliance, achieving the highest possible ethical and legal standards. We dedicate ourselves to be the employer of choice for our associates, a collaborative and respected labour provider to our clients and to work in conjunction with the government and enforcement bodies."*

We understand our duty to respect the human rights of all individuals and are committed to tackling the exploitation of workers within our supply chain.

This is our fifth statement regarding our efforts to prevent modern slavery, human trafficking and exploitation in line with Section 54 of the Modern Slavery Act 2015. It details our steps taken during the year ending December 31<sup>st</sup> 2022. It has been approved by the Pro-Force Limited Board of Directors and the Senior Leadership Team.

*Matthew Jarrett*

**Matthew Jarrett**

CEO

Pro-Force Limited



## Key Activities in 2022

Strengthened existing relationship with the government of Uzbekistan and established new working relationships with the government of Tajikistan.

Completed RTW refresher training with respected external consultant

Enhanced our internal auditing template to be in line with current best practice guidance from Responsible Recruitment Toolkit (RRT) and Practical Ethics

Created a news section on our website and published articles regarding the steps we take to eliminate exploitation



## About Pro-Force

**£124m turnover**

**32 operational centres**

**23,000 staff placed on assignment**

**4,500 bed spaces nationwide**



## Our Supply Chain

We are committed to ensuring transparency at all levels of our recruitment and labour supply chain. In 2022, 97% of our recruitment was done directly by Pro-Force - an increase of 2% compared to 2021. This greatly reduces the risk of exploitation of our workers and ensures all candidates are provided with accurate, quality information about the recruitment process and their assignments. For the SWS scheme, we strengthened our existing relationships with the government of Uzbekistan, and forged new partnerships with the government of Tajikistan. We are aware that a higher level of engagement improves worker understanding, therefore reducing the risk of third party influence and exploitation.

## Our Commitments

Our policies, [available on our website](#), are owned by our board of directors and provide us with direction and structure for our day to day activities. Reflecting the latest in ethical best practice, we ensure they are effectively embedded through all levels of the organisation via robust training, internal and external audits and regular improvement reviews. We assess our performance, how effective our policies are, and make improvements as is required.



## Our Policies

Our Preventing Modern Slavery Policy is the key document that outlines what we do, and how we do it. Its key purpose is to minimise the risk of exploitation within our business, as well as define how we react should it be discovered. We share it with our client base via contractual commitments within our Terms of Business for labour supply, as well ensure all our key staff have completed training as fits the risks associated with their roles.

We require all our clients to actively demonstrate their commitment to our policies, as well as have their own, prior to working together. We annually risk assess our clients in areas such as modern slavery, exploitation, health, safety & welfare before placing workers with them. This is monitored continuously via regular review meetings.

Our Preventing Modern Slavery Policy is supported by the below policies, which detail our internal practices and procedures to recognise and reduce the risk of exploitation within all stages of our supply chain:

- Ethical Trading Policy
- Ethical Supply Chain Policy
- Responsible Recruitment Policy
- Anti-Bribery & Corruption Policy
- Anti-Bullying & Harassment Policy
- Access to Remedy Policy

All our policies as well as our internal risk assessment methodology are written with consideration of the following standards:

- IOM International Recruitment Integrity System (IRIS) Code of Conduct
- ILO Fair Recruitment Initiative
- Institute of Business and Human Rights Dhaka Principles
- Employer Pays Principle
- Global Social Compliance Code
- ETI Base Code
- SMETA & BSCI methodologies
- GLAA Licensing Standards
- UN Guiding Principles on Business & Human Rights

We carry out an annual internal audit, based on the highest legal and ethical standards and best practice, to ensure we are adhering to our own policies and procedures. We aim to be the employer of choice for all our staff and associates, and create a workplace where each individual feels valued, enjoys their work and has the opportunity to develop further.



## Assessment of Risk

**Below is a summary of the risks that Pro-Force has identified, and the steps which have been taken to reduce them in 2022.**

**For further information on what action Pro-Force takes to promote equality of opportunity, please refer to Pro-Force's Equal Opportunities Policy.**

### Lack of Awareness

2022 has seen further work towards improving worker rights awareness, including:

- Further investment in to the the Just Good Work app, including providing content for the SWS-specific area. The app provides access to free critical information and advice on worker rights, recruitment, employment, life outside work and changing roles. We have promoted the app for free download to all our current and new associates. This app is free to anyone to download, not just Pro-Force staff.
- Continuing regular associate surveys and acting upon the feedback. A [summary of the results of the 2022 SWS survey](#) is available on our website.
- Collaborated with GLAA to create a video which informs SWS workers of their rights and sets realistic expectations of working in UK agriculture
- Started a collaboration with the International Organisation for Migration (IOM) to write and deliver pre-departure training to Migrants on the Seasonal Worker Programme.

Ensuring each level of the business is equipped with the skills and knowledge to recognise signs of modern slavery and exploitation is crucial in our mission to eradicate it from our supply chain. Having access to the best practice resources is the first part of this. Pro-Force obtained Verified Business Partner status with Stronger Together, as well as Business Partner status for the Responsible Recruitment Toolkit. Our CEO sat on the Member's Council of the Association of Labour Providers, and our Compliance Team also sat on the GLAA Liaison Group. Our robust internal training programme ensures that our front line staff are equipped with the skills they need to mitigate risks.

## Recruitment Fees

One of the biggest risks in the recruitment supply chain is the payment of illegal work finding fees. We continue to reduce our exposure by conducting 97% of our recruitment directly, by our trained staff. Whilst the source country governments facilitate our recruitment drives in-country, it is always Pro-Force staff who conduct and oversee the recruitment and selection process.

2022 has seen further improvement on this front, as we have strengthened our existing relationships with the government of Uzbekistan. You can view examples of our recruitment trips and meetings with governments of the central Asian countries on the [news section of our website](#).

By partnering directly with the relevant ministries of source country governments, we are ensuring fair access to job assignments for workers, and the ability to avoid exposure to illegal work finding fees from unscrupulous actors in the supply chain.

## Our Recruitment Countries

We recruited from across Europe and Asia including from Romania, Bulgaria, Ukraine, Uzbekistan, and Tajikistan.



## USE OF THIRD PARTIES

As stated above, 97% of our recruitment is conducted directly by Pro-Force staff. However, in the instances where third parties are used, 2022 saw us continue to implement procedures to reduce risk, including:

- Thorough annual audit, in line with industry best practice
- Regularly surveying workers recruited via third parties
- Ensuring workers received high quality pre-departure information (including a link to the Just Good Work app)

We recognise that utilising third parties increases the level of risk in recruitment, however are satisfied that the above mitigates the risk to an acceptable level.

## COMMUNICATION & ACCESS TO REMEDY

We have reduced risks in these areas via:

- Delivering online surveys to collect information on recruitment experiences and risk exposure, and remedying/mitigating where issues are identified
- Conducting informal worker interviews each time a member of the Compliance team is on an accommodation or work site with Pro-Force workers present. Consultancy from Practical Ethics augmented the way these worker interviews were conducted, for example, wearing Pro-Force branded clothing so workers immediately knew that the person in question is a Pro-Force representative.

Furthermore, workers are informed (via their handbook and pre-departure orientation material) of the various communication channels that they can raise concerns surrounding exploitation, such as:

- GLAA
- Police
- Independent whistleblowing hotline (SeeHearSpeakUp)



## RISK & EXPOSURE IN 2022

Our main areas for risk and exposure for 2022 include:

- **Source countries:** Our key source countries which include Ukraine, Uzbekistan, Tajikistan, Romania and Bulgaria are listed on the Trafficking in Persons Report and have a number of issues with non-compliance on the Trafficking Victims Protection Act's minimum standards
- **Recruitment Methodology:** Any use of third party agents has hidden third party risks associated, as well as risks associated with recruitment fees. However we believe that our mitigating acts listed above reduce the risk to an acceptable level.
- **Limited Access to Remedy:** Gaps in our worker's awareness of how to access help in the event that they experience exploitation represents a significant risk

Our strategy and action points for 2022 therefore focussed on reducing our exposure in these key risk areas. Our approach was twofold; one, improving knowledge and awareness, and two, implementing positive action for change and improvement.



## OUR EXPERIENCES IN 2022

Instances of potential labour exploitation within our supply chain were raised with us, and we have worked with external agencies (such as the GLAA) to resolve these. Concerns raised included:

- Allegations of recruitment fees paid in source countries, which are often legally permitted by local laws.
- Businesses offering visa application support services, which are not required to be used by migrants, as they receive the support they need from Pro-Force and government Migration Centres in the source country
- Hidden third party organisations offering jobs and providing individuals with fake 'Pro-Force' documents.

We have thoroughly investigated all allegations of fees paid in source countries as well as flagged them to the GLAA. As stated above, we began the creation of a video to raise worker awareness of their rights, also in conjunction with GLAA.

We continued to work with the GLAA and other government departments to optimise communication channels between parties to ensure UKVI are always aware which workers Pro-Force are bringing into the UK. This reduced the risk of traffickers using fraudulent documents to try and bring people into the UK.

As new threats and exposures threaten our supply chain, our methods of dealing with such threats develop. 2022 has seen the above areas of exposure and our concomitant approach to be more partnership-based, where we work closely with external organisations (such as GLAA, IOM and Practical Ethics) on a preventative, as opposed to reactionary, basis.

We will continue to incorporate best practice techniques to prioritise worker safety at all stages of the recruitment lifecycle.



## NEXT STEPS

Our key aim in 2023 is to continue to imbed our values at all stages of our operations, continually review our performance and drive forwards progressive and effective change. Below is a summary of progression against KPIs in 2022, and plans for 2023:

### 1. Internal and External Training

2022 saw progress towards moving Pro-Force's training modules on to the learner management system, Moodle. The aim for 2023 is to induct all new Pro-Force staff, and ensure all staff complete Pro-Force training modules, via Moodle. Refresher training on right to work checks was completed in 2022 with an external consultant, and refresher training on preventing modern slavery via Stronger Together is scheduled for 2023. A senior member of staff will also complete the RRT Introduction to Responsible Recruitment training, in order to continue status as business partner of RRT.

### 2. Augment Pro-Force's Internal Audit in Line with Best Practice

In 2022, work began with Practical Ethics to augment Pro-Force's internal audit standard to be in line with industry best practice. The plan for 2023 is for all Pro-Force sites to satisfactorily complete and pass the augmented internal audit, and close all non-conformances in line with the newly created and agreed Pro-Force audit charter. The charter sets out that 100% of non-conformances will be addressed within 4 weeks of the audit report being sent to the relevant staff member.

### 3. Worker Surveys

In 2022, we surveyed our SWS workers at the start, middle and end of their assignments. Results from these surveys are published on our website, as outlined above. In summary, the results have been very positive and broadly in line with those from 2021. This is reassuring given the difficulties faced as a result of the invasion of Ukraine, and the higher than usual percentage of new workers recruited. For example, 83.4% of respondents either strongly agreed or agreed that they were provided with good information during the recruitment process, and 96.5% either strongly agree or agree that they have a good understanding of their job and what is required of them. Naturally, there are some learning points to take away. For example, 67.4% of workers either strongly agree or agree that they are provided with enough working hours each week.

## NEXT STEPS

### 3. Worker Surveys (continued)

In 2023, Pro-Force will be working closely with our clients to ensure that, wherever possible, changes are made to the extent that workers feel like they're receiving a sufficient number of hours work. Though it is worth nothing that despite Pro-Force having always contractually required growers to ensure workers are offered at least 32 hours every week, workers generally consider a minimum of 40 hours per week to be 'enough'. Workers on the scheme have a maximum stay of 26 weeks to earn, hence consider every week as vital.

Furthermore, we will continue to conduct informal worker interviews whenever we are present at an accommodation or work site, and act to remediate issues wherever possible.

### 4. Recruiting Further Compliance Staff

In 2022, a Compliance Officer was added to the Compliance team, as outlined above. In 2023, the aim is to hire and retain a further Compliance Officer, bring the team to four: Compliance Director, Compliance Manager, and Compliance Officer x2. With a sufficiently resourced Compliance team, Pro-Force will conduct pro-active spot checks and further worker interviews to identify and remediate potential exploitation issues for workers.

### 5. Pre-Departure Training in Association with IOM

Further work is planned to review and develop the SWS pre-departure training, based on worker feedback that will be collected via visits to UK farms.



## COLLABORATION

### Gangmasters and Labour Abuse Authority

As a licenced labour provider since 2005, Pro-Force works collaboratively with the GLAA to ensure we are always up to date on the latest in risk management and mitigation in our business.



Gangmasters &  
Labour Abuse Authority

### Stronger Together

A Stronger Together Business Partner since its inception in 2015, we ensure our internal procedures reflect the latest in pragmatic approaches to tackling and preventing modern slavery within our supply chain. 2022 has also seen us become Verified Business Partners.



### Responsible Recruitment Toolkit

We have become RRT Business Partners in 2022 and further incorporated the principles of the Responsible Recruitment Toolkit into our day to day practices.



### SEDEX

As a registered member of SEDEX, Pro-Force incorporate the principles of the ETI Base Code into all aspects of our business practices.



### International Organisation for Migration

In our first collaboration with IOM, we assisted with the writing of pre-departure orientation materials, and plan to continue this work in 2023.





**PRO-FORCE**

WORKING TOGETHER

Pro-Force Limited  
Hunstead House  
Chartham, Kent  
CT4 7PE

01227 733880  
[enquiries@pro-force.co.uk](mailto:enquiries@pro-force.co.uk)  
[www.pro-force.co.uk](http://www.pro-force.co.uk)