

MODERN SLAVERY STATEMENT 2023

: A modern slavery statement sets out the steps organisations are taking to prevent modern slavery in both their businesses and supply chains as required under The Modern Slavery Act 2015.

MODERN SLAVERY STATEMENT

YEAR ENDING DECEMBER 2023

At Pro-Force, we are dedicated to the prevention of modern slavery, adhering to strict procedures and industry guidelines. However, we believe true progress involves exceeding compliance with a collaborative effort to actively work to change the narrative through continuously striving for improvement.

This is our sixth statement regarding our efforts to prevent modern slavery, human trafficking and exploitation in line with Section 54 of the Modern Slavery Act 2015.

This statement covers the actions Pro-Force has taken to address modern slavery in our operations and supply chains year ending 31st December 2023 and outlines our action plan for 2024. The term "Modern Slavery" is used throughout this document - this terminology is used to cover topics of human trafficking, slavery, servitude and forced labour.





Founded in 2005, Pro-Force Ltd has been operating in recruitment services for 19 years, growing a strong team and client base across the UK. We continue to build strong links with our source countries to ensure we oversee all aspects of our recruitment process. We specialise in recruiting for the GLAA licensed sectors of Agriculture and Horticulture. Pro-Force have been licensed operators of the Seasonal Worker Pilot Scheme and subsequently the Seasonal Worker Scheme since 2019.

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. Furthermore, we understand that our associates place their trust in us when they enter the recruitment process. We work to educate wider teams to spot flags and uncover potential exploitation and are committed to handling potential cases responsibly and with our associate's best interests in mind, and at all times operate with integrity, honesty and transparency.

£148m

TURNOVER
DURING 2023

37

OPERATIONAL CENTRES

32,000

STAFF PLACED
ON ASSIGNMENT

Carolina

6,000

SEASONAL WORKER BED SPACES NATIONWIDE

EXPERIENCED IN MANAGING SEASONAL WORKER ACCOMMODATION



OUR GREATEST STRENGTHS



We believe our greatest strengths are our people and the collective knowledge and experience they bring together. We are proud of our team's commitment to ensuring compliance beyond best practice.

We train all our authorised recruiters in Responsible Recruitment practices and all our employees in Modern Slavery and Labour exploitation via our online learner management system. This system and its content allow us to increase the skills and capabilities of all of our staff and monitor ongoing training requirements and completions.

We have a team of Managers and Welfare Officers across our sites who are committed to putting the safety and trust of our associates above all else.

OUR SUPPLY CHAIN

Our recruitment practices are designed to ensure that all potential workers and employees have valid right to work in the UK, to place them in safe working environments and to safeguard against exploitation and abuse.

We do not enter into business with any organisation in the UK or abroad that knowingly supports, is involved in or is not actively working to mitigate risk of labour exploitation.

We are committed to ensuring transparency at all levels of our recruitment and labour supply chain. In 2023, 98% of our recruitment was done directly by Pro-Force - an increase of 1% compared to 2022 therefore reducing the risk of third-party influence and exploitation. Performing the recruitment ourselves means we are present with our associates throughout their recruitment and work placements. This greatly reduces the risk of exploitation and ensures all candidates are provided with accurate, quality information about the recruitment process and their assignments.

WE ARE COMMITTED TO ENSURING TRANSPARENCY AT ALL LEVELS OF OUR RECRUITMENT AND LABOUR SUPPLY CHAIN.

Pro-Force has signed co-operation agreements with a number of countries, and 2023 saw us sign our co-operation agreement with Kyrgyzstan. Pro-Force held recruitment events in Kyrgyzstan and Kazakhstan which provided applicants with details about the Seasonal Worker Scheme, information on the work available, examples of accommodation available and the opportunity for questions from the applicants. This was followed by one-to-one interviews between the Pro-Force team and the applicants.

Pro-Force's Compliance Director and SWS Team Manager participated in online forums and tv chat shows that included Q&As with viewers live on air in Kyrgyzstan, as part of our ongoing work to ensure workers under the Seasonal Worker Scheme have access to accurate and up to date information.

During 2023 Pro-Force were also pleased to host a delegation for the Uzbekistan Government and the International Organization for Migration (IOM) where they could speak with Uzbek Citizens regarding their experience on the Seasonal Worker Scheme.









You can read more about these achievements on our blog: www.pro-force.co.uk/blog

OUR COMMITMENTS AND POLICIES

OUR POLICIES

The <u>policies</u>, available on our website, are owned and embedded throughout all levels of the organisation by our Senior Leadership Team. These documents are our guidance throughout our management systems to ensure we are acting according to ethical best practice and beyond on a daily basis. We implement and monitor their compliance via robust training, internal and external audits. We implement a regular review process on our policies, procedures and corresponding documents with the involvement of management teams and incorporate associate and employee feedback.

Our Preventing Modern Slavery and Labour Exploitation 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 as 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
- <u>Equal Opportunities Policy</u>

- Responsible Recruitment Policy
- Anti-Bribery Policy
- Anti-Bullying & Harassment 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

INTERNAL AUDITS

We carry out annual internal audits across all our UK regions, 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.



RISK AND CONTROL MEASURES

OUR ASSESSMENT

Below is a summary of the risks that Pro-Force has identified, and the steps which have been taken to reduce them throughout 2023 and beyond.

AWARENESS OF THE RISKS OF MODERN SLAVERY

We collaborate closely with our clients through defined induction processes and regular review meetings to ensure that all worker receive information and instruction on spotting the signs of modern slavery and are provided with safe working conditions.

Furthermore, we have robust and varied reporting mechanisms available to ensure staff can bring concerns to our attention without fear of reprisal. This includes the opportunity to report anonymously and we are committed to investigating all concerns raised.

RECRUITMENT FEES

Pro-Force actively promotes via our website, social media accounts, job advertisements, recruitment fairs and word of mouth that we do not charge recruitment fees. All reported cases of potential recruitment fees paid or offered are internally investigated and reported to the appropriate authority.

Our recruitment countries

- Kyrgyzstan
- Uzbekistan
- Tajikistan
- Romania
- Bulgaria
- Macedonia
- Ukraine
- Kenya
- South Africa



USE OF THIRD PARTIES

98% of our recruitment is conducted directly by Pro-Force's trained and authorised staff. On the rare and necessary occasions where 3rd parties are used, we continue to implement procedures to reduce risk including:

- Conducting an annual audit, in line with industry best practice
- Implementing worker surveys and carrying out worker interviews on registration and during their placements with questions surrounding their recruitment route
- We ensure that all workers receive information and clear pre-departure information if they are travelling to the UK to work

We recognise that utilising third parties increases the level of risk in recruitment, however we are satisfied that the above mitigates the risk to an acceptable level and we are committed to continuous monitoring of 3rd party recruitment processes according to best practice.

INTRODUCTORY RECRUITMENT

We recognise that a percentage of our recruitment comes from word of mouth and by way of recommendations from family and friends. We have robust systems in place to ensure that we do not allow large group introductions and where this is tested, that we investigate all situations. We carry out scheduled due diligence checks and additional spot checks on associate details to look for signs of unexplained links and repetition.

JOB SCAMS

We raise awareness through our website and recruitment practices that Pro-Force never charge for job finding services or charge any fee in connection with registration or obtaining work contracts. We actively keep watch for scam job advertisements using our name and continue to report to Action Fraud and other relevant authorities immediately and get these fake advertisements shut down. Where potential job seekers to these scams are made known to us, we seek to educate them of our real advertisements and support them to apply via the authorised application process.

During 2023 Pro-Force's Compliance Director spoke at the Global Forum for Responsible Recruitment in New York to raise awareness about the effects of job scams on the Seasonal Worker Scheme.

3RD PARTY 'HELPERS'

3rd party 'helpers' are those claiming to be able to assist potential workers to get a job with Pro-Force at cost. Pro-Force actively advertise that we do not charge recruitment fees and we are pleased to report that our close relationship with workers is alerting us to these situations and to individuals so that we are then able to pass information to the relevant authorities and intervene before workers part with any money. Where known we then direct those jobseekers through the correct and proper recruitment channels we have in place.



2023 ACHIEVEMENTS

Summary of our achievements against actions set out in our 2022 Modern Slavery Statement.

AUGMENT PRO-FORCE'S INTERNAL AUDIT IN LINE WITH BEST PRACTICE

The Compliance team augmented the internal audit in line with Best Practice standards. All regions were audited against the new internal audit standard.

RECRUIT FURTHER IN COMPLIANCE

In order to strengthen the Compliance team a second Compliance Officer was appointed with valued experience in Accommodation and Welfare Compliance. Pro-Force also engaged the services of Shayne Tyler, owner of TylerBladon Practical Ethics, as Ethical Compliance Advisor for Pro-Force Ltd.

ADDITIONAL ACHIEVEMENTS

- Pro-Force are proud to have been the first Labour Provider to undergo the Responsible Recruitment Progress Assessment Audit which verified our self-assessment score of 97%.
- Pro-Force created a video to inform seasonal workers about their employment rights and what to expect on UK farms. The video features experiences from Seasonal workers around the recruitment process, the working day, how they are paid, accommodation and what they do in their spare time. This video was gifted to the GLAA for use across the entire industry.

INTERNAL & EXTERNAL TRAINING

- All staff are now inducted and assigned training modules via the learner management system. The completion of assigned training Modules are monitored by the Compliance Team.
- We continue to maintain our <u>RRT Business Partner status</u> and our <u>Stronger Together</u> <u>Advanced Business Status.</u>
- Stronger Together training continues to be implemented and its requirements assessed regularly.

WORKER SURVEYS

Following our 2022 Seasonal Worker Scheme survey results we have been working with 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. In our <u>survey</u> we ask whether workers feel they are provided with enough hours and we are pleased to report that in 2023 there was an increase on 2022 of 8.3% in worker satisfaction with working hours.

PRE-DEPARTURE TRAINING IN ASSOCIATION WITH IOM

Pro-Force collaborated with the IOM to create pre-departure orientation material in Tajikistan. Pro-Force previously provided funding towards and created content for the Just Good Work app which informs migrant workers of their right's predeparture and at all stages of the recruitment journey.

NEXT STEPS FOR 2024

INVEST IN ETHICAL LEAD

Continue to grow the Compliance team with the introduction of an Ethical Lead, with a focus that includes Modern Slavery.

EDUCATION AND TRAINING

Continue to train staff beyond compliance and enact Stronger Together courses on Tackling Modern Slavery.

PROGRESS AUDITING FUNCTION

Continue to progress Pro-Force's internal auditing function, in line with industry best practice.

FACILITATE FORUMS

Implement compliance forums and FAQs for all Pro-Force Regional Management to ensure they are up to date with the latest requirements and legislation, and provide vital real-time information to the Compliance team.

PILOT EMPLOYER PAYS PRINCIPLE

In conjunction with major retailers and select NGOs, pilot the UK's first version of the Employer Pays Principle, to further mitigate the risk of debt and illicit fee paying for migrant workers.

ESTABLISH CHAMPIONS

Implement Modern Slavery Champions across all regions and enable greater worker voice through accommodation forums.

INCREASE RRT COURSES

In addition to our internal training on Responsible Recruitment, we aim to increase the numbers of our staff trained in the Responsible Recruitment Toolkit courses 'Introduction to Responsible Recruitment' and 'Eliminating worker paid recruitment fees'.





As a licensed 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.



STRONGER TOGETHER

As an Advanced Stronger Together Business Partner (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.



RESPONSIBLE RECRUITMENT TOOLKIT

We have been RRT Business Partners since 2022 and we incorporate 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 predeparture orientation materials and continued with that collaboration throughout 2023.



FLEX

Helped inform FLEX's 2024 reports related to worker welfare in the SWS scheme.





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