



PRO-FORCE[®]

WORKING TOGETHER

MODERN SLAVERY STATEMENT 2024

: A Modern Slavery Statement outlines the measures an organisation is taking to prevent modern slavery and human trafficking within its operations and supply chains, in line with the requirements of the Modern Slavery Act 2015.

MODERN SLAVERY STATEMENT YEAR ENDING 2024

At Pro-Force, we are committed to preventing modern slavery. We uphold this responsibility by embedding robust procedures and implementing industry best practices across our operations. We are committed to continuous improvement, recognising that the nature of modern slavery risks evolves - and so must our efforts to address them.

We believe that meaningful change requires more than simply meeting legal obligations. It calls for a genuine commitment to collaboration, accountability, and ongoing progress in fostering ethical, transparent, and respectful working environments.

This marks our seventh annual statement outlining our efforts to combat modern slavery, human trafficking, and exploitation, in line with Section 54 of the Modern Slavery Act 2015. It details the actions taken by Pro-Force during the year ending 31st December 2024 to address modern slavery within our operations and supply chains, as well as our planned initiatives for 2025.

Throughout this document, the term “Modern Slavery” refers to human trafficking, slavery, servitude, and forced labour. This statement has been formally approved by the Senior Leadership Team of Pro-Force Limited.



MATTHEW JARRETT
CHIEF EXECUTIVE OFFICER,
GREOSN GROUP



ABOUT PRO-FORCE



Founded in 2005, 2025 will see Pro-Force Ltd mark 20 years of delivering recruitment services. Over the years, our team and client base have continued to grow and strengthen, reflecting our ongoing commitment to high standards and ethical recruitment.

Our specialism lies in recruiting for GLAA-licensed sectors of Agriculture and Horticulture. Since 2019, Pro-Force has proudly been licenced operators of the Seasonal Worker Pilot and subsequently the Seasonal Worker Scheme. We have developed strong partnerships with our source countries to maintain oversight of every stage of the recruitment process, ensuring transparency and accountability.

We recognise our responsibility to uphold and protect the human rights of all individuals engaged in our supply chains and are fully committed to addressing and preventing worker exploitation. This commitment is embedded across our operations through structured policies, rigorous procedures, and preventative practices designed to identify and mitigate risks of modern slavery at every stage.

We also acknowledge the trust placed in us by our associates when they enter the recruitment process. To honour that trust, we provide ongoing training to our teams to help them recognise signs of exploitation and act appropriately. We are dedicated to handling any concerns with care, integrity, and transparency - always placing the well-being of our associates at the centre of everything we do.

£158m

TURNOVER
DURING 2024

41

OPERATIONAL
CENTRES

36,000

STAFF PLACED
ON ASSIGNMENT

6,000

SEASONAL WORKER BED SPACES NATIONWIDE
EXPERIENCED IN MANAGING SEASONAL WORKER ACCOMMODATION



OUR GREATEST STRENGTHS

OUR PEOPLE

We continue to recognise that our greatest strength lies in our people and the collective knowledge and experience they bring. We take pride in our team's ongoing dedication to not only meeting but exceeding compliance standards.

All authorised recruiters receive regular training in Responsible Recruitment practices, and we provide training on Modern Slavery and Labour Exploitation through our online learning management system. This platform enables us to continually enhance the skills and awareness of our workforce, while effectively tracking training progress and compliance.

Our network of the Leadership Team, Managers, Operational teams, Compliance and Welfare Officers across all sites remains steadfast in prioritising the safety, dignity, and trust of our associates, reinforcing our commitment to a supportive and ethical working environment.

OUR SUPPLY CHAIN

Our recruitment practices remain focused on ensuring that all potential workers and employees have a valid right to work in the UK, placing them in safe and secure working environments while safeguarding against exploitation and abuse. We maintain a strict policy of not engaging with any organisation, domestically or internationally, that is involved in, knowingly supports, or fails to actively mitigate the risks of labour exploitation.



ENGAGING ETHICAL EXCELLENCE BEYOND COMPLIANCE.

WE ARE COMMITTED TO FULL TRANSPARENCY ACROSS ALL LEVELS OF OUR RECRUITMENT AND LABOUR SUPPLY CHAINS.

By continuing to conduct the majority of recruitment activities directly, we maintain close involvement with our associates throughout the recruitment and placement process. This hands-on approach significantly reduces the risk of exploitation and ensures that all candidates receive clear, accurate, and comprehensive information about their recruitment journey and work assignments.

In the first quarter of 2024, Pro-Force's designated Seasonal Worker Scheme team, accompanied by Pro-Force's Managing Director, conducted recruitment visits across Central Asia, interviewing over 5,000 candidates interested in joining the Seasonal Worker Scheme. Pro-Force recruitment visits provide 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. Joining Pro-Force were Jacob Bolton and Oliver Fisher from FLEX, along with Dr. Oana Burcu, who was part of Nottingham University's research programme "*Agricultural Workers in the UK: The Role of Policymakers in the Human Rights Remedy.*"

During a visit to Kyrgyzstan, Greosn CEO Mathew Jarrett met with His Majesty's Ambassador to Kyrgyzstan, Nic Bowler, as well as senior officials from the Kyrgyzstan government, to discuss governance and oversight of the Seasonal Worker Scheme. The goal of these discussions was to reinforce the commitment to making the scheme a safe and positive experience for all workers.

The UK Government later announced a five-year extension of the Seasonal Worker visa route until 2029 - excellent news that highlights the importance of continuing to protect workers' rights and ensuring the ongoing success of the scheme.



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

OUR POLICIES

The [policies](#), (available on our website) continue to be owned and fully embedded at all levels of Pro-Force by our Senior Leadership Team. These documents remain foundational to our management systems, guiding us to consistently act according to ethical best practices - and beyond - in our day-to-day operations.

We maintain rigorous implementation and monitoring of compliance through ongoing training, as well as regular internal and external audits. Our policies, procedures, and related documents undergo scheduled reviews involving management teams, with valuable input from our associates and employees to ensure they remain relevant and effective.

Our Preventing Modern Slavery and Labour Exploitation Policy remains central to our approach, clearly defining how we work to minimise exploitation risks and respond promptly if concerns arise. We actively share this policy with our clients through contractual commitments in our Terms of Business and ensure all key staff receive training tailored to the risks relevant to their roles.

Before engaging with clients, we require them to demonstrate their commitment to these principles by having aligned policies in place. Additionally, we conduct annual risk assessments covering areas such as modern slavery, exploitation, health, safety, and welfare, with ongoing monitoring through regular review meetings to uphold these standards.

Supporting our Preventing Modern Slavery Policy are a suite of policies and procedures detailing our internal practices designed to identify and mitigate exploitation risks across every stage of our supply chain. These include:

- [Ethical Trading Policy](#)
- [Ethical Supply Chain Policy](#)
- [Equal Opportunities Policy](#)
- [Responsible Recruitment Policy](#)
- [Anti-Bribery Policy](#)
- [Anti-Bullying & Harassment Policy](#)
- [Preventing Sexual Harassment Policy](#)

In addition, we recognise the importance of being prepared to respond effectively to incidents of modern slavery. To this end, we have a Remediation Policy in place.

Together, these policies form the backbone of our ongoing commitment to ethical and responsible business practices, enabling us to adapt and strengthen our response to emerging challenges. Each policy is reviewed at least annually, incorporating insights and lessons learned over the previous year.

All our policies are developed with careful consideration of internationally recognised standards and best practices, ensuring alignment with current ethical and legal frameworks. These include:


- International Organisation for Migration (IOM) International Recruitment Integrity System (IRIS) Code of Conduct
- International Labour Organisation (ILO) Fair Recruitment Initiative
- Institute of Business and Human Rights
- Dhaka Principles for Migration with Dignity
- Employer Pays Principle
- Global Social Compliance Programme (GSCP) Code
- Ethical Trading Initiative (ETI) Base Code
- Sedex Members Ethical Trade Audit (SMETA) & Business Social Compliance Initiative (BSCI) methodologies
- Gangmasters and Labour Abuse Authority (GLAA) Licensing Standards
- United Nations Guiding Principles on Business and Human Rights

These frameworks underpin our commitment to responsible recruitment, labour rights, and the prevention of exploitation throughout our operations and supply chains. By integrating these standards into our policies and procedures, we ensure that our approach remains robust, compliant, and responsive to evolving risks in the UK and globally.

INTERNAL AUDITS

We conduct comprehensive internal audits annually across all our UK regions, guided by legal requirements, ethical standards, and industry best practices. These audits help us verify our compliance with internal policies and continuously identify opportunities for improvement.

Our ongoing goal is to be the preferred employer for our staff and associates by fostering a supportive and inclusive work environment where every individual feels respected, motivated, and empowered to grow professionally.

A woman wearing a dark visor and a dark long-sleeved shirt is smiling and holding a large green plastic crate filled with ripe strawberries. She is standing in a greenhouse with rows of strawberry plants visible in the background. The entire image has a green color overlay.

**WE AIM TO BE THE
EMPLOYER OF CHOICE,
FOSTERING A WORKPLACE
WHERE INDIVIDUALS ARE
VALUED, FULFILLED, AND
EMPOWERED TO REACH
THEIR FULL POTENTIAL.**

RECRUITMENT FEES

Pro-Force consistently promotes a strict no-fee recruitment policy through our website, social media platforms, job advertisements, recruitment events, and direct communication. We maintain open dialogue with all staff to raise awareness of risks they may have encountered. Any allegations or indications of recruitment fees being paid or requested are thoroughly investigated internally and reported to the relevant authorities as necessary.

Our recruitment countries

- Kyrgyzstan
- Uzbekistan
- Tajikistan
- Romania
- Bulgaria
- Ukraine
- Nepal
- Kazakhstan
- Poland
- Moldova



THIRD-PARTY RECRUITMENT PRACTICES

The majority of our recruitment is conducted directly by Pro-Force's dedicated, trained and authorised staff who travel between the UK and our source countries to ensure full oversight of the process.

In the limited instances where third-party support is required, we implement strict risk-reduction procedures, including:

- Audits conducted by our Compliance team in line with current legislation and recognised industry best practices
- Welfare checks, structured interviews, and targeted surveys to assess the recruitment journey and identify potential concerns
- Clear and accessible pre-departure information for all workers travelling to the UK

While we acknowledge that using third-party providers inherently increases the risk of exploitation, we are confident that our mitigation measures significantly reduce this risk. We remain committed to ongoing oversight and continuous improvement in our third-party recruitment processes.

INTRODUCTORY RECRUITMENT

We acknowledge that a portion of our recruitment originates through word-of-mouth referrals and recommendations from family or friends. While these introductions can be valuable, we recognise the potential risks they may pose. To manage this, we maintain robust systems that prevent large group introductions and prevents accepted levels of introductions from going unverified.

Where such patterns are identified, we investigate thoroughly to ensure there is no undue influence or risk of exploitation. We conduct regular due diligence checks, along with unscheduled spot checks on associate details, to detect any unexplained links or repeated patterns that may indicate underlying concerns.

JOB SCAMS

Pro-Force never charges individuals for job-finding services, for registering or for securing work contracts. We consistently raise awareness of this through our official recruitment channels and website to help prevent exploitation.

We remain vigilant in monitoring for fraudulent job advertisements that misuse the Pro-Force name. When identified, we report these scams to the GLAA, Action Fraud, and other relevant authorities in both the UK and internationally. We also work closely with social media platforms to swiftly remove fake accounts and misleading job posts.

When job seekers contact us to report suspicious activity, we prioritise their protection by confirming the legitimacy of opportunities, providing guidance on our authorised recruitment process, and supporting them in applying safely and correctly. This approach reinforces our ongoing commitment to transparent, ethical recruitment and the safeguarding of all individuals seeking work with Pro-Force.

UNCONNECTED THIRD-PARTY 'HELPERS'

A persistent and challenging risk involves unauthorised third-party individuals who falsely claim they can help secure employment with Pro-Force in exchange for payment. In some cases, these third-party individuals use falsified documentation to mislead job seekers into believing the offer is genuine.

Pro-Force maintains a clear and public stance against these practices. We consistently communicate—across all channels—that we do not charge recruitment fees under any circumstances.

Thanks to the strong and trusted relationships we've built with our workforce, we are often alerted to these incidents in real time. This enables us to take swift action by reporting credible information to the relevant authorities and, where possible, intervening before any financial or emotional harm occurs.

When job seekers report being approached by such individuals, we take immediate steps to support them, redirecting them to our official recruitment channels and helping them understand how to identify genuine opportunities with Pro-Force. This remains a critical part of our commitment to ethical, transparent, and safe recruitment practices.



**UNITED BY OUR SHARED
VALUES, DRIVEN BY A
PASSION FOR PROGRESS.**

2024 ACHIEVEMENTS

**Summary of our achievements
against actions set out in our 2023
Modern Slavery Statement.**

MODERN SLAVERY CHAMPIONS

We introduced Modern Slavery Champions across all regions to strengthen our frontline response. Trained to identify and act on signs of exploitation, our Champions use a 'see it, fix it' approach and are equipped with knowledge of local support services.

EDUCATION & TRAINING

We continue delivering Stronger Together training, reinforcing awareness and action against exploitation. In 2024, we began enhancing this with real-life case studies to deepen understanding, which was implemented in 2025. Collaboration across our Modern Slavery Champions also supports a unified, informed response.

COMPLIANCE ETHICAL LEAD

We strengthened our Compliance team with an Ethical Lead, bringing experience in agriculture, H&S, and worker welfare. This role supports Champion development, enhances training, and fosters cross-business collaboration.

EMPLOYER PAYS PRINCIPLE

In response to growing industry focus, we've developed a pilot methodology for the Employer Pays Principle. This careful approach will provide meaningful insights into its practical application, with outcomes to be shared as the pilot progresses.

SEASONAL WORKER SCHEME TASKFORCE PARTICIPATION

As a funding member of the Seasonal Worker Scheme Taskforce (SWSTF) and SWS Operators, Pro-Force plays an active role in industry education and best practice. In 2024, our Compliance Director contributed to several key workstreams, including:

- Designing and evaluating the scheme-wide worker survey
- Developing the independent grievance mechanism
- Shaping content and selecting the 2025 grower roadshow provider
- Drafting RRPA General Regulations
- Aligning with SEDEX SMETA 7 terms
- Standardising worker transfer procedures
- Participating in the EPP Feasibility Study advisory groups
- Contributing to policy recommendations to Government

AUDITING FUNCTION

In 2024, we continued auditing all regions against our internal framework, using findings to refine processes and identify targeted training needs. Our framework remains dynamic and benchmarked against industry best practice.

COMPLIANCE FORUM

Our monthly Compliance Forums equip regional teams with current guidance, industry updates, and policy changes. They also provide space for discussion, aligning our compliance approach and intel across all locations.

ACCOMMODATION FORUMS

To ensure worker voice remains central, we've developed clear guidance on forum facilitation for our Accommodation and Welfare teams. In collaboration with clients, we promote a culture of openness, engagement, and respect.

NEXT STEPS FOR 2025

LAUNCH THE PRO-FORCE 456 STRATEGY

2025 will see the launch of our ambitious three-year Pro-Force 456 Strategy, designed to showcase our leadership through clearly defined pillars of responsibility and accountability across key areas of the business. The strategy will foster collaboration at all levels, drawing on the knowledge and experience of our teams to drive growth. By empowering our workforce, we aim to enhance our focus on modern slavery risks, close potential gaps, and strengthen operational integrity.

GOLD STANDARD COMPLIANCE TRAINING

We are proud to be progressing a collaborative initiative to achieve gold-standard compliance training across all regions. Bringing together Operations and Compliance, this project identifies key areas for development to deliver high-quality, impactful training. Our goal is to ensure operational teams are equipped with the knowledge they need, feel supported in their roles, and are able to perform at their best when it comes to spotting and reporting signs of exploitation.

SWS PASSPORT

In 2025, Pro-Force will launch its SWS Passport - a clear, accessible guide for successful Seasonal Worker Scheme applicants. It will outline each stage of the journey from recruitment through to UK arrival and include key information on worker rights, practical advice, and signposting to support services.

RESPONSIBLE RECRUITMENT PROGRESS ASSESSMENT (RRPA)

Pro-Force will undergo the Interim RRPA, having been the first Scheme Operator to complete the initial assessment in 2023 with a 97% score. This reflects our ongoing commitment to compliance, worker welfare, and continuous improvement under the Seasonal Worker Scheme.

MODERN SLAVERY CHAMPIONS CONTINUOUS DEVELOPMENT

We are committed to the continuous development of our Modern Slavery Champions through scenario-based training. This forms a key part of our Gold Standard approach, ensuring Champions are equipped with practical tools to identify and respond to modern slavery risks. This work is being carried out in conjunction with an external expert consultant from Practical Ethics.

RESPONSE PLAN DEVELOPMENT

In conjunction with an external expert consultant from Practical Ethics, we are strengthening our internal response plan by incorporating insights from scenario-based training. This includes refining case handling and escalation procedures, and reflects our belief in learning from the expertise of our operational teams to better support their response to modern slavery.



GANGMASTERS AND LABOUR ABUSE AUTHORITY

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.



FLEX

Pro-Force helped inform FLEX's 2024 reports related to worker welfare in the SWS scheme.





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

01227 733880
enquiries@pro-force.co.uk



www.pro-force.co.uk