

1. Policy Statement

- 1.1. Pro-Force recognises that effective recruitment & selection practices are fundamental to its future success, and good selection can lead to better services to its clients, higher morale, lower staff turnover and lower rates of absenteeism.
- 1.2. This policy is designed to provide all staff with a responsibility for recruitment, selection, interviewing & appointing both workers and employees with a framework for compliant, safe, ethically responsible and effective recruitment methods, following best practice & legislation at all times. It covers the recruitment of workers, both local and overseas.
- 1.3. All recruitment and registration of workers will be made in accordance with this policy, with a worker-centred approach taken to ensure high levels of job satisfaction and engagement.
- 1.4. This Policy supports Pro-Force's Equal Opportunities Policy, in ensuring that no employee receives favourable or discriminatory treatment on the grounds of any protected characteristic – age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. All workers will receive fair and equal opportunity and treatment free from discrimination on the grounds of nationality, political belief, socio-economic background, parental status, trade union membership, or working hours status.
- 1.5. All recruitment will be carried out in accordance with Pro-Force internal policy and procedure, and in line with Gangmasters Licensing standards, legislation, regulations, Stronger Together principles and the Ethical Trading Initiative Base Code.
- 1.6. Any client requests that do not adhere to the requirements of this policy (including requests that could breach legal or ethical requirements such as working hours or equalities legislation) must not be filled and escalated to management for investigation and client liaison.

2. Scope of the policy

- 2.1. This policy is applicable to all Pro-Force branches, sites and locations across the UK, any Company that falls into the Pro-Force Group, any approved labour or service provider, and to all staff members including directors, senior managers, managers, officers and employees and workers (collectively referred to as staff in this policy).
- 2.2. This policy does not form part of the contract of employment for employees or the workers Contract for Services, and as such, Pro-Force reserves the right to amend the policy at any time.

3. Responsibility for implementation of the policy

- 3.1. The Senior Leadership Team have overall responsibility for the implementation of this policy.
- 3.2. The Compliance department is responsible for monitoring and reviewing the operation of this policy and making recommendations for changes to minimise risk to operations.
- 3.3. The Senior Leadership Team, regional managers, recruiters and account managers are required to familiarise themselves with, and understand this policy, its operation, and any related procedures. Compliance will provide training documentation and guidance as is relevant to their responsibilities.
- 3.4. Questions related to the use, understanding or direction of this policy should be directed to the Compliance department.

4. Ethical Recruitment Standards

- 4.1. No recruitment fees or related costs are to be paid by workers. Recruitment fees are defined in accordance with the GLAA Licensing Standards and UK law.
- 4.2. Proactive steps are taken to mitigate the risk of forced labour, and where it is identified there is appropriate response and remediation. Workers have freedom of movement throughout recruitment and work, as far as is permitted by their right to work.
- 4.3. Job offers are clear and accurate, and all workers understand both the nature of the work and the terms and conditions in relation to the job.
- 4.4. Workers have the legal eligibility to work in the country, region or job role, and where applicable, for the client they are being recruited for.
- 4.5. Workers living in the local area are given fair access to work.
- 4.6. No child labour is used i.e. no workers aged 16 or under are recruited and we take proactive measures to identify and prevent child labour by completing identity checks for age verification.
- 4.7. All workers are engaged in formal and lawfully recognised relationships that are suitable for their working arrangements.
- 4.8. Every effort must be made to offer assignments on a regular basis.
- 4.9. All workers are paid for their working time, in full and on time, in accordance with UK law, and all working time is suitably managed and does not exceed relevant legal, ethical and contractual limits.
- 4.10. All workers receive the paid holiday to which they are entitled, along with any other statutory benefit.

- 4.11. In accordance with the relevant Health and Safety law, so far as is reasonably practical, Pro-Force ensures that work and workplaces are safe by carrying out an initial and annual Health and Safety check of both the client and the client's site of work.
- 4.12. Worker's freedom of association is respected.
- 4.13. So far as is reasonably practical, Pro-Force takes steps to ensure that workers are protected from mistreatment at work through an initial ethical assessment and annual reviews.
- 4.14. Any accommodation or transport provided to workers is safe, hygienic and meets legislative and ethical requirements.
- 4.15. Appropriate remedy is accessible to all workers during their recruitment and supply, where applicable.
- 4.16. Proactive steps are taken to reduce the risk of forced labour, trafficking and other hidden third-party labour exploitation during their recruitment and supply.
- 4.17. All workers can access effective grievance mechanisms and response and remedy procedures without fear of repercussions, as set out in Pro-Force's Complaints Policy and Grievance Policy.
- 4.18. Compliance will monitor adherence to this policy by a range of mechanisms such as internal auditing, worker surveys, worker welfare interviews and engaging external organisations to audit Pro-force's supply chains.
- 4.19. Pro-Force will communicate openly and transparently about the progress it makes and any challenges it faces through engaging with industry representative bodies, relevant government organisations, relevant NGOs, publishing its Modern Slavery Statement and through its website.

5. Recruitment Process

- 5.1. Prior to commencing the recruitment process, the appropriate staff member must confirm the details of the role with the client, and obtain either an outline of the role and candidate requirements, or a full Job Description and Person Specification.
- 5.2. Prior to placing adverts or conducting any form of search, the appropriate staff member must confirm the Terms of Business and Service Level Agreement with the client. No appropriate staff member may send any candidates to the client without prior agreement and signature (or emailed agreement) of the Terms of Business.

6. Advertising (General)

- 6.1. All advertising must be carried out in accordance with Pro-Force's advertising standards.
- 6.2. All adverts must be approved by the relevant manager or client prior to being posted. False advertising, or misleading advertising, is not permitted.
- 6.3. All adverts must contain – Pro-Force's name as the advertiser of the role, the standard disclaimer at the bottom of the advert, and the type of work – e.g. permanent, temporary, fixed term. Client names should not be used in any advert without prior permission.
- 6.4. If the rate of pay is included within the advert, the advert must also contain – the nature of the work, the general location of the work and the minimum level of experience / qualifications required. If the pay rate is variable, the level of experience / qualifications required to get the top rate of pay must be detailed.
- 6.5. If the role is advertised in an EEA state, the advert must also be advertised within Great Britain, either at the same time, or all or part of the 28 days before the advert is hosted outside of Great Britain. All adverts written in another language to English must also contain an English translation – either with that advert, directly before or after, or advertised at the same time as that advert. It is advisable to advertise all roles in English on www.pro-force.co.uk at the same time as advertising elsewhere in other languages to ensure all requirements are met.

7. Conducting Online Due Diligence Checks

- 7.1. Online searches must be carried out in line with the Conducting Online Due Diligence Checks Procedure.
- 7.2. Checks must be carried out during the registration for workers (excluding those on a seasonal worker scheme visa) for the sole purpose of ensuring the application and the information supplied within it is genuine.
- 7.3. The applicant must be made aware that these checks will take place.
- 7.4. No recruitment decision is made solely on the basis of information obtained from a source that may be unreliable.
- 7.5. If information received leads to the applicant not being appointed, then this will be made known to the applicant.

8. Managed Worker Registration Process

- 8.1. All registration must take place within a secure location, typically a Pro-Force office, accommodation site or authorised site, with a suitably trained coordinator – no externally completed registration packs are permitted.

- 8.2.** Essential information can be taken via telephone, e-mail, social media or via Pro-Force's online system, but full registration must take place physically with the candidate, to ensure the interview process is completed, and right to work checks can also be completed.
- 8.3.** The registration pack must be completed in full by the worker. No one is permitted to complete the registration pack on behalf of the worker, although the relevant staff member may help the worker if they are having difficulty. The completed Registration Pack must be retained on the worker's profile on Pro-Force's online system, or completed digitally.
- 8.4.** All workers must be issued a copy of their contract and a copy of the Worker Handbook in a language they understand, and a copy retained on the worker's profile on Pro-Force's online system.
- 8.5.** All relevant staff members must complete the interview assessment form (including questions about how they came to Pro-Force and if they have paid any charges) and the checklist to ensure all parts of the registration pack have been completed.
 - All relevant staff members must carry out a right to work check in accordance with Pro-Force's Right to Work Policy.
 - Registration, right to work checks and inductions are only permitted to be carried out by competent staff members who have had suitable training on safe recruitment practices via Pro-Force's learner management system.
- 8.6.** All workers must have the 48 Hour Opt Out choice explained to them, ensuring they are ticking the correct box according to their wishes.
- 8.7.** Other documentation to be completed includes:
 - All client-specific documentation, including any applicable English or colour testing,
 - If a worker is to be residing in Pro-Force Accommodation, the Licence Agreement must be signed by the worker, with the English version retained on the worker's profile on Pro-Force's online system, and a copy issued to the worker, in their native language if required. The condition agreement must be completed as part of the induction into the accommodation.
 - If the worker is going to be using Pro-Force transport services, the transport agreement must be signed and kept on the worker's profile on Pro-Force's online system.
 - If the worker does not have their own bank account, and is not going to be opening one prior to being getting paid, the worker has the option to take out a One Pay account. Any worker who wishes to take out a One Pay account must sign the One Pay agreement, which must be retained on the workers' profile. When the worker has a fixed address and national insurance number, they will be contacted in writing by Compliance and recommended to open a bank account.
- 8.8.** The worker must be issued with the relevant Assignment Details schedule, according to the assignment to be undertaken. This can be issued to the worker at registration, or provided via email or their profile on Pro-Force's online system within 3 working days of the worker commencing assignment.
- 8.9.** Pro-Force ensures workers complete the client induction prior to commencing assignment and retain a copy of the induction.
- 8.10.** No children under the age of 16 may be recruited, and any young people aged 16 and 17 may only be registered if a Young Workers Risk Assessment completed.
- 8.11.** Upon request, workers are to be provided access to all of their personal recruitment and registration data that is held by Pro-Force.

9. International Worker Recruitment

- 9.1.** Overseas recruitment must be carried out directly, via a job fair, telephone, email or authorised social media.
- 9.2.** Where a labour provider is used to recruit, this is only done so when sufficient due diligence has been carried out by Pro-Force.
- 9.3.** If a job fair is to be carried out, this must be authorised by a member of the Senior Leadership Team, and checks must be carried out to ensure the relevant legislation in the applicable country is adhered to.
 - All applicants must be interviewed at the job fair, and personal details collected, including details about how they found out about Pro-Force, and any charges they may have paid at any point.
 - If Pro-Force is organising travel for the applicants who wish to have their travel organised, any deposits taken for transport must be recorded and a receipt provided.
 - All applicants must watch the International Recruitment Presentation, to provide them with full details about working in the UK with Pro-Force.
 - In the instance that a worker is suspected of having paid work finding fees, or any other "red flag" is suspected, the issue must be escalated to an appropriate member of the Senior Leadership Team.
- 9.4.** Overseas recruitment may also be carried out by telephone or video call.
- 9.5.** Social media is a useful tool for communicating with job applicants. Only authorised Pro-Force pages (Twitter, LinkedIn, Facebook & Instagram) are permitted for use to communicate with applicants as part of the recruitment process.

- 9.6. International recruitment is only to be carried out by appropriate staff members who have undergone the relevant Pro-Force training.
- 9.7. No Young People aged 16 or 17 nor Children under the age of 16 may be recruited internationally.

10. Termination of Contract / Assignment

- 10.1. In line with 4.8, every effort will be made to offer regular work, and where appropriate and available transfers or alternative assignments will be offered. Where no alternative work is available or due to poor conduct/capability, workers will receive all outstanding pay and benefits to which they are entitled, and freedom to change employment is respected.

11. Policy Review

- 11.1. The Compliance department is responsible for reviewing this policy annually, or as is required, to ensure that it meets legal standards and reflects best practice.



Matthew Jarrett

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