

Modern Slavery and Preventing Hidden Labour Exploitation

Aim of the Policy

This policy is an integral part of our approach to tackling modern slavery and ensuring everyone's human rights are protected. Jarrodean are committed to taking a pro-active approach to preventing hidden labour exploitation and modern slavery. It outlines how people may be exploited and what we should do if we are aware of any such exploitation.

Scope and Organisation Structure

This policy is for all managers, employees and clinicians that we engage and is available for Clients on request. The nature of our business in sourcing and supplying permanent staff nationally and internationally into clinical settings requires us to be diligent in our day to day operational activity. All staff, clients and clinicians are encouraged to raise any concerns regarding modern slavery or labour exploitation with our Managing Director.

Policy Statement

Jarrodean respects individuals and everyone's rights and as an employer will behave responsibly. We are committed to ensuring that all recruitment practices and procedures are compliant with the law and that all employees are aware of and can recognise hidden labour exploitation and once recognised understand how to escalate appropriately.

What is Hidden Labour Exploitation?

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 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 those that are affected reluctant to come forward.

Responsibility

The Directors and managers have overall responsibility for this policy, but all employees and clinicians have access to this policy and its contents. We are all responsible for recognising and taking action in the prevention of modern slavery and hidden labour exploitation.

Jarrodean is committed to ensuring that any form of modern slavery, labour exploitation and human trafficking remain absent from our business and that we continue to be compliant with all aspects of the Modern Slavery Act 2015.

Suppliers

In sourcing candidates Jarrodean only conduct business with known reputable companies and if engaging with new suppliers Jarrodean request confirmation of their Modern Slavery and Hidden labour Exploitation policies and training as part of our ongoing due diligence and risk management prior to any engagement.

Policy Commitments

Jarrodean have:

1. Designated appropriate managers to have responsibility for developing and operating company procedures relevant to this issue.
2. Accept that job finding fees are a business cost and will not allow these to be paid by job applicants.
3. Ensure that all staff responsible for directly recruiting workers are trained to be aware of issues around third-party labour exploitation and signs to look for.
4. Ensure that labour sourcing, recruitment and worker 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 Gangmasters and Labour Abuse Authority and police.
6. Provide information on tackling "Hidden Labour Exploitation" to our workforce.
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. Positively encourage and support employees and clinicians to report such exploitation which may be occurring within their wider communities for appropriate escalation.
9. Require labour providers and other organisations in the labour supply chain to adopt policies and procedures consistent with the above.

Whistle Blowing

If anyone suspects or has reason to suspect that modern slavery or any form of hidden labour exploitation has or is taking place they must report it immediately to the Managing Director without fear of reprisal.

This awareness is not confined within the employment or engagement of Jarrodean Limited but applies to the wider community. Jarrodean will support any individual who raises such concerns in an appropriate and professional manner. Fully investigating all concerns.

The Managing Director will engage with the relevant parties to investigate and will make referrals as appropriate to governing bodies the Gangmasters and Labour Abuse Authority and local police.

Where appropriate Jarrodean will follow the below stages:

Investigation

For a variety of reasons, agencies other than the Police may need to conduct investigations into incidents of alleged Hidden Labour Exploitation or Modern Slavery. This is because absence of (or insufficient evidence to substantiate) criminal activity cannot be taken as confirmation that abuse has not taken place. Investigation is a process that focuses on gathering "good evidence" that can be used as a basis for the decision whether or not abuse has occurred. It must be a rigorous process and the evidence must be capable of withstanding close scrutiny, as it may later be required for formal proceedings. Such proceedings may be against the perpetrator of the abuse or against other individuals or organisations in positions of responsibility and accountability.

Involve the Alleged Victim

The process of the enquiries should be carefully explained to the allegedly abused person and their consent to proceed with the enquiry obtained if possible. Arrangements should be made to have a relative, friend or independent advocate present if the person so desires. The relative, friend or independent advocate should not be a person suspected of being in any way involved or implicated in the abuse.

Bring in Specialist Skills

Consideration must be given to enlisting the services or advice of personnel with specific skills or knowledge, particularly where people involved have limited communication skills, or where English is not their first language.

Coordinate

- Jarrodean will identify those who need to be involved and ensure the following processes are addressed:
- Investigation of the incident;
- Action to ensure immediate safety of the alleged victim if appropriate;
- Inform the Gangmasters and Labour Abuse Authority and local police.
- Action with regard to criminal proceedings;
- Action such as, suspension, disciplinary proceedings, use of complaints and grievance procedures for perpetrators and action to remove the perpetrator from the supplier/client list
- Consideration of implications relating to regulation, inspection and contract monitoring;
- Appropriate measures to reassure and support those that are subject to the abuse and those that have raised the concern and in keeping them informed;
- Maintain appropriate records.

Jarrodean undertake to ensure all members of staff and clinicians have a proper understanding of the importance of this policy and of taking action to tackle issues of modern slavery or hidden labour exploitation. This policy is included in Induction.

Policy Review – Annual or earlier in line with any legislative changes.

Review Date	Undertaken By	List of Changes	Version No
24 Nov 2023	S Parfrey MD		1
15 Nov 2024	S Parfrey MD	0	1
30 Oct 2025	S Parfrey MD	0	1

Signed:



Shayne Parfrey RN (Aust) FIRP (UK)
 Managing Director