

# MODERN SLAVERY AND FORCED LABOUR REMEDIATION PROCEDURE

The Workforce Incident Management Team will be responsible for maintaining and fulfilling responsibilities outlined in the Remediation Policy, and therefore carry out duties as a Remediation Team. Depending on the issue it may be appropriate to add members of the temporary workforce, members of the client's workforce and / or trade union representatives to the Remediation Team on an issue by issue basis.

The Workforce Incident Management Team will be responsible for establishing a remediation programme for the business and overseeing activities intended to assist victims of modern slavery and / or forced labour. These will consist of:

- Reviewing / renewing the Remediation Policy annually
- Fulfilling the responsibilities outlined in the Remediation Policy and this Procedure
- Carrying out investigations
- Reporting to the appropriate authorities where required
- Completion of the Stronger Together Good Practice Checklist annually
- Completion of a Modern Slavery Risk Analysis and Report annually, including agreeing an action plan with the board of directors
- Maintaining the Stronger Together training module, ensuring appropriate Gi Group operational employees receive suitable training and ongoing relevant information
- Obtaining feedback from workers as part of audit interviews and periodic surveys
- Maintenance of a Modern Slavery Risk Register and annual completion of high risk location self-risk assessments
- Completion of annual internal and agency supplier spot audits based upon risk review, and including modern slavery risk indicators as part of internal Quality audits
- Periodic completion of duplicate NI number, address / landlord and bank account reviews
- Maintaining the Responsible Recruitment Toolkit SAQ, including managing improvement plans

These activities will be carried as part of the general personal roles and as such no additional funding will be required. Where funding is required it will be agreed as part of the annual budgeting.

Additional roles and responsibilities of HR and payroll, Department/Functional Heads, Trade Union / Employee Reps, and Welfare Officers, to support operational due diligence steps addressing exploitation risks will be defined and communicated to the relevant colleagues where required.

The following types of issue may constitute grounds for raising a grievance / complaint (the evidence to be provided to determine the relevance and seriousness of the grievance / complaint is also outlined):

- Debt bondage: Evidence provided may include evidence of job role deception, payments to obtain work, debts incurred relating to employment, landlord / rent agreements where relevant, email / photo / social media communications
- Control: Evidence provided may include written statements, witness statements bank details, phone records, payslips, email / photo / social media communications
- Isolation: Evidence provided may include written statements, witness statements, photo or video footage, email / photo / social media communications
- Violence / intimidation: Evidence provided may include written statements, witness statements, photo or video footage, medical records, email / photo / social media communications
- Workplace exploitation / mistreatment: Evidence provided may include written statements, witness statements and payroll records, photo or video footage, bank statement, right to work / ID documents, client policies and worker contract, email / photo / social media communications
- Excessive working: Evidence provided may include written statements, witness statements and payroll records
- Criminal / suspicious trading activities: Evidence provided may include written statements, witness statements and payroll records, photo or video footage, bank statement, right to work / ID documents, worker contract, financial records and credit checks, email / photo / social media communications

NB: Specifics in these areas are outlined in the Workplace Critical Issue Report.

**Channels available to workers and / or third parties for raising complaints and / or for obtaining support are:**

- Through the Gi Group website at <https://uk.gigroup.com/>
- Emailing [MDS@gigroup.com](mailto:MDS@gigroup.com)
- Contact ACAS on 0300 123 1100
- Contact the Employment Agencies Standards Inspectorate (EAS) on 020 7215 5000
- Report it to the Gangmasters & Labour Abuse Authority on 0800 432 0804 or the Modern Slavery Helpline on 08000 121 700 or at [www.modernslaveryhelpline.org/report](http://www.modernslaveryhelpline.org/report)
- The Salvation Army Human Trafficking Helpline on 0300 303 8151
- Call the Police in an emergency on 999, or 101 if it is not urgent

Victims of modern slavery and / or forced labour have the right to pursue forms of remedial action other than those proscribed by Gi Group at any stage beyond internal remedy mechanisms.

## **Incident Investigation**

Investigating Managers will conduct any workforce investigations using an Investigation Checklist and the sample Worker Interview Questions. The Investigating Manager will ensure they adopt good practices in recording and protecting evidence.

A Workplace Critical Issues Report will be completed when it is suspected that an applicant or job holder is a victim of trafficking, forced labour or other third-party work related exploitation.

Where required a Remediation Record that is used to document the remediation provided to identified victims of modern slavery, will be completed.

Gi Group will confirm that second tier suppliers have a procedure for providing remedy to identified victims within their workforce in a Supplier Questionnaire. The procedure and its application will be checked during audits. The Investigating Manager will agree the best method of communicating investigation progress and outcomes with the victim at the beginning of an investigation. Gi Group's preferred method will be an in-person meeting, away from the workplace; and mail, email or phone communication of this information must only take place if it does not endanger / make the victim vulnerable in any way.

Once an investigation has been completed the root cause and any internal Gi Group process corrective or preventative actions that are required will be documented in the final report. These will be reviewed annually as part of the Risk Review, incorporated in the annual improvement action plan and if required documented as part of the Modern Slavery Policy Statement, Remediation Policy and Remediation Procedure.

## **Remedies Offered By Gi Group**

The steps taken will very much depend upon the circumstances of the issue and the outcome of the investigation, and may require the assistance of an enforcement authority. Remedies will include:

- Restoring the worker to original situation before the abuse occurred: This may be in the form of restoration of employment status, return of any property, payment of due wages
- Compensation to the victim for the abuses that took place. This compensation may be financial or otherwise.
- Rehabilitation of the victim: This may include medical and psychological care as well as legal and social services.
- Take steps to satisfy the victim that the abuses will not reoccur: This may include changes to business processes or the engagement of government.

The Remediation Reporting Tool will be completed for each investigation that requires follow-up actions, which will include timescales and who is involved / has responsibilities (suppliers, local groups, NGOs, charities, local or national Government, the victim's family) as part of the remedial actions.

This Remediation Procedure will be made available to Gi Group operational staff through GiNET, and will be made available to the temporary workforce via the Gi Group website.