

MODERN SLAVERY POLICY.

PREVENTING HIDDEN LABOUR EXPLOITATION & HUMAN TRAFFICKING POLICY.

BACKGROUND

Modern Slavery, including Human Trafficking and Hidden Labour Exploitation remains a significant and growing concern across the UK. The introduction of legal frameworks such as the Modern Slavery Act 2015 brought attention to the issue of Modern Slavery in global supply chains, however the risk of exploitation still exists across multiple sectors, particularly those reliant on overseas labour. Combined with labour shortages for those high demand sectors, the UK's post-Brexit immigration framework designed to prioritise skilled over low-skilled workers has further limited access to essential workers. This has inadvertently increased dependence on vulnerable labour populations, elevating the risk of exploitation.

WHAT IS HIDDEN LABOUR EXPLOITATION

Hidden labour exploitation refers to the abuse of job applicants or workers by third parties, such as criminal gangs, informal recruitment networks or individuals acting independently to the employer or labour provider.

Examples of exploitation can include the charging of illegal recruitment fees in exchange for work, coercion into substandard, overcrowded and controlled accommodation and the confiscation of ID documents. These exploitative practices are often deliberately concealed by the criminals making detection difficult, and victims are often fearful or unwilling to come forward and disclose their situation due to embarrassment, intimidation, dependency or lack of awareness of the wrongdoing and information on their rights to work in the UK.

WHAT IS HUMAN TRAFFICKING

Human Trafficking refers to the illegal movement or control of people, either between countries or within the UK, through force, deception, or coercion for the purpose of exploitation. It involves the recruitment, transportation, transfer, harboring or the receipt of individuals against their will or through manipulation. Traffickers frequently use false promises of work, safety, or a better life to lure and exploit their victims.

SCOPE

This policy applies to all employees who work for JDR, all workers including those that apply for work with us and our business partners throughout our supply chain.

TAKING ACTION

Businesses have a moral obligation to ensure that their operations and supply chains are free from exploitation.

JDR has ethical recruitment practices built around the well being and protection of our workers. The following are examples of the due diligence steps and measures that we take to reduce the risk of exploitation and remain vigilant in identifying it.

✓ **Reporting and Whistleblowing mechanisms**

We have various easily accessible avenues for workers to use to talk to us about any concerns, anonymously should they choose to.

✓ **Training & Awareness**

The JDR teams are fully trained to understand the impact of all forms of exploitation on our workers and know the signs of what to look for, following the appropriate steps to report and escalate any concerns that arise.

✓ **Recruitment Practices**

We engage with our workers at key stages of the recruitment process to check on their wellbeing. We verify that they are

not paying for the job with JDR, are not being controlled by third parties, and are fully informed of their rights.

All job information is shared clearly and in a language they understand. We utilise our IT system to conduct background

checks on personnel details, scanning for potential issues like multiple workers residing at an address, or shared bank

details and phone numbers.

✓ **Risk assessment & continuous improvement**

We have conducted a risk assessment to evaluate the potential of Modern Slavery within our business. Based on the

findings, we have implemented targeted measures to address any vulnerabilities and deter potential exploiters from

infiltrating JDR and our clients.

By regularly reviewing this risk assessment, we can use it to test processes and improve our prevention methods.

✓ **Collaboration**

At JDR, we recognise the importance of working closely with our business partners and clients to promote collaboration

in the fight against Modern Slavery. By sharing best practices, aligning our approaches and continuously reviewing and

enhancing our processes, we hope to deter exploitation, and inspire other business to prioritise the prevention of Modern Slavery.

POLICY ADOPTION

This policy was signed off by the senior leadership team on 6th January 2026. It will be reviewed on an annual basis.

Incident Management Plan

WORKER SUPPORT ESCALATION PROCESS

JDR is committed to putting workers at the centre of their actions, with robust policies managed centrally, and collaborating with partners with shared values to prevent and address Modern Slavery within the recruitment industry.

JDR team members, our clients, visitors or workers can report any concerns into the Compliance and HR teams using the contact details below;

compliancesupport@jdr.co.uk

It is likely that general work-related minor complaints or queries will come directly into the JDR operations team on site and can be resolved quickly and effectively. These complaints should still be recorded on the Complaints Report Register. See Separate document).

For complaints that need Compliance or HR teams involvement, including those related to Modern Slavery concerns, we will treat them with the utmost seriousness and aim to address them within 48 hours of receiving them. We will carry out an initial fact-finding exercise, investigating discreetly and, if determined necessary, escalate the matter to the relevant external enforcement authorities. The Complaints Report Register will be updated with all actions taken.

For a suspected case of Modern Slavery, in the first instance we will call the Gangmasters Labour Abuse Authority on 0800 432 0804 or email them at intelligence@gla.gov.uk or contact@gla.gov.uk 0345 602 5020 (Mon-Fri 9-5pm)

If we need a GLAA team manager urgently, the HR & the Compliance team can contact the following GLAA contacts directly;

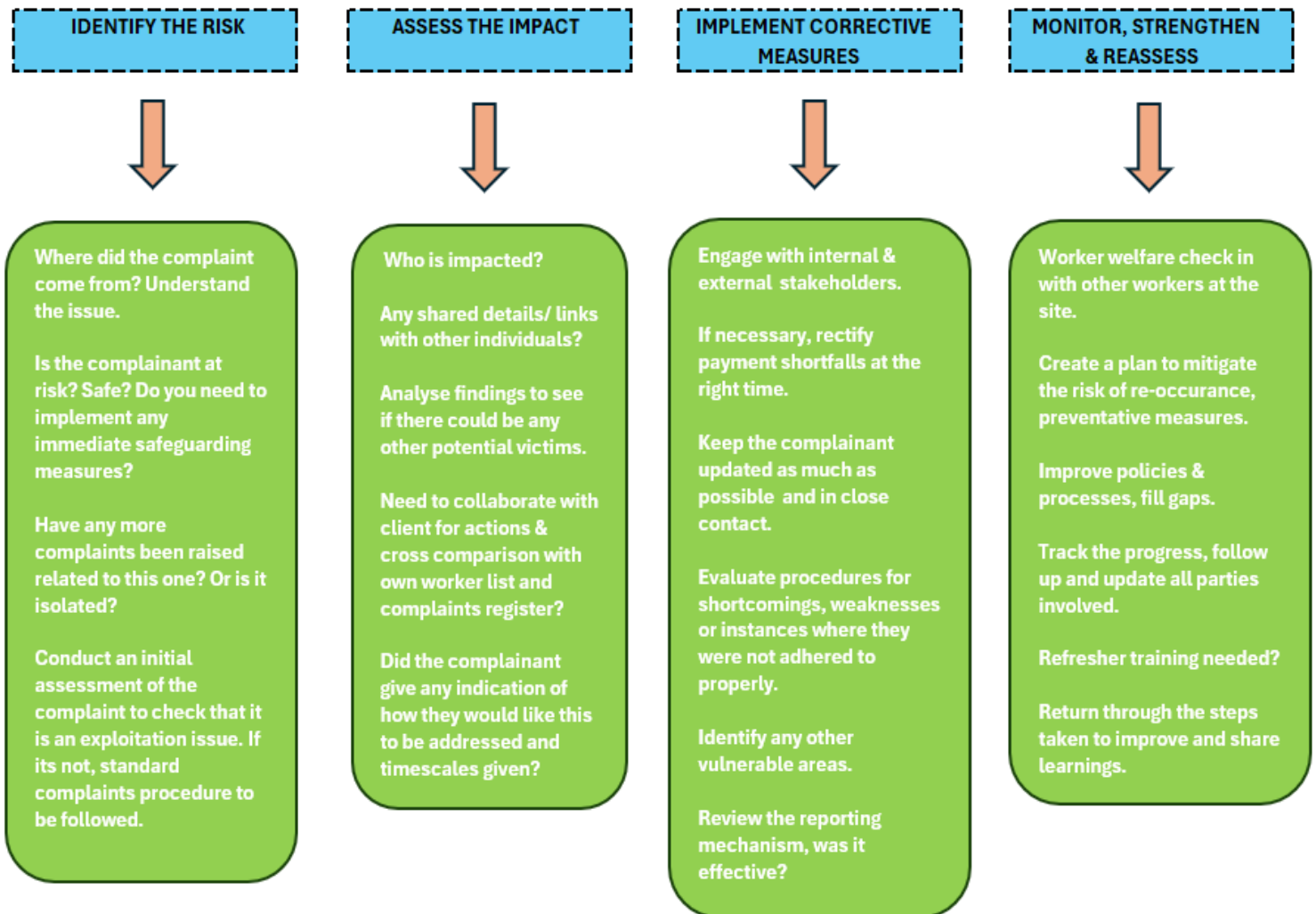
For North - West -Fiona Panetta: Fiona.panetta@gla.gov.uk
North-East - Mike Heyes: mike.heyas@gla.gov.uk
South-East - Paul Williams: paul.williams3@gla.gov.uk
South-West - Neville Bradbury: Neville.bradbury1@gla.gov.uk

For any other concerns involving criminal activity, we will call the local police force or dial 999 for immediate assistance.

It is crucial to document the steps taken from the time the complaint comes into JDR and through the communications and efforts taken to address and resolve the issue. This record serves as a reference point, both for returning to it as a reminder for details and for future use, enabling the review and analysis of complaint patterns and their origins to identify trends towards mitigating risks of further issues being raised

MODERN SLAVERY REPORTING AND ESCALATION PROCEDURE.

Following a report of Modern Slavery, JDR acts swiftly to prioritise the protection and safety of workers ensuring that all the relevant details are documented and reported to the appropriate enforcement authorities for further investigation, with the aim of preventing the perpetrators from continuing their criminal activities. These are the steps that we take to guide us through the reporting process following our initial fact-finding exercise that has identified a suspected case of labour exploitation.



A well-defined plan for addressing potential cases of Modern Slavery allows us to proactively tackle human rights issues, protect victims and uphold legal and ethical standards. It minimises risks to the victim safety, prevents perpetrators from evading investigation, through our actions, alerting them prematurely. Additionally, it safeguards, both our teams and the JDR business overall.

Protecting the individuals

When workers understand that their safety and privacy will be protected, they are more likely to report exploitation or abuse. It is essential that JDR and all their teams present themselves as friendly, approachable and willing to dedicate time to support our workers, listen to their concerns, and value their feedback. Checking in, connecting with our workers and actively engaging with them shows that we value their well-being and are committed to supporting them. This contributes to a positive reputation as a great employer for our workers and demonstrates our corporate responsibility.

Following a disclosure of exploitation, the individual may be at risk of retaliation by the exploiters, so precautions must be taken to prevent attention being drawn to them and the exploiter doesn't gain access to them.

Remember: It is common that the exploiter, a member of the group or a 'watch person' is nearby. This could lead to them notifying others in the group....

Following the situation being raised to the Compliance or HR team, A key team member (s) will support and safeguard the potential victim's wellbeing, and in a situation of more than one potential victim coming forward, separate rooms will be used for each, to ensure their statements are unaffected by the other. The individual (s) will be fully reassured that their confidentiality will be upheld.

If the incident identifies, after the fact-finding exercise that it's a suspected case of Modern Slavery/ Labour exploitation, The Compliance/ HR team contact will escalate to the Senior Management team and externally to the relevant authorities.

Following the report into the GLAA/ Modern Slavery Helpline or the Police, next steps for the potential victim (s) will be determined, with the relevant details being passed onto the site to understand the next course of action.

If it seems that the case is not directed by the GLAA to pick up, and the police are the appropriate authority to contact, please follow the instructions below;



You should **only** call 999 when;

- You or someone else is in **immediate** danger.
- If the crime is on progress- **happening now**.
- You need police help **immediately**.

Example situations are;

- A worker reports they are a victim of Domestic Abuse/ Modern Slavery or Trafficking and need immediate help.
- Serious exploitation identified without victim disclosure, of a situation where workers are vulnerable and neglected.
- Spotting suspicious people or a vehicle at a workplace.
- Workplace violence at or a theft occurring at JDR site/ office.
- Vandalism or property damage to a JDR site/ office.
- Threats to public safety.



For non-emergency police matters, call **101**

- 101 is the contact number for any police force in England & Wales, and is available 24/7
- Calling 101 can reduce the pressure on the 999 system, allowing the police to deal with emergency calls.
- You should call 101 if you want to talk to your local police officer, get crime prevention advice or report a crime that does not need an emergency response.

Protecting the individuals

Once the police have been contacted by the Compliance/ HR team;

- ✓ If the police are to attend site, the JDR site representative will be notified, and the client will be informed discreetly.
- ✓ Ask for the incident number and make a note of it, this way you can track the progress of the case, obtain updates, or if you need to provide the police with any further information as the case progresses.
- ✓ Continue to offer support and assistance to the authority, the client and the potential victim if safe to do so and guided by the police/ GLAA..

Points to remember

- ✓ Always protect yourself and do not put potential victims at risk.
- ✓ Always have a victim centred approach when dealing with potential victims
- ✓ Provide immediate medical care if needed.
- ✓ Show empathy & respect their wishes & needs.
- ✓ Take the victim to a safe place, make them comfortable and feel able to talk freely.
- ✓ Do not make personal judgements, they need to feel they can trust you.
- ✓ Do not alert the exploiter/ trafficker, be discreet in your actions and behaviour.
- ✓ Record all the details, taking as many notes as you can but be careful not to alarm the victim by doing so.
- ✓ Ensure the victim identity remains confidential to prevent retaliation from those involved.
- ✓ Do not use unofficial/ unapproved interpreters, they may have their own agenda.

Useful contacts.

GLAA Confidential Helpline

0800 432 0804

The Gangmasters and Labour Abuse Authority is the foremost intelligence & Investigative agency for Labour Exploitation in the UK.



Unseen is a UK charity who run the Modern Slavery & Exploitation Helpline and work with organisations & other charities to stamp out Slavery.



An independent crime-fighting charitable organisation in the UK. Allows people to call anonymously to pass on information about crime.

REMEDIATION POLICY

PURPOSE

At JDR, we understand that cases of mistreatment, including exploitation and Modern Slavery, will often require appropriate remediation and support. It is vital to act quickly, but still effectively, following an identified case of exploitation to protect the victim and escalate the issue, following the JDR Incident Management Plan.

Amongst many things, remediation provides the support needed to heal, rebuild trust that may have been lost and demonstrates that mistreatment is taken seriously and not tolerated.

SCOPE

The policy applies equally to all employees who work for, or who apply to work for the organisation.

REMEDIATION

Each case should be reviewed individually, and the type of resolution is likely to depend on the nature and scale of the issue, as well as the stakeholders involved, and is best achieved through effective collaboration.

From an understanding of the specifics of a case, a review of all the facts and assessment of the impact on a victim (s) along with engagement with them to ask what outcome they would like to see, will help explore remediation options.

Some examples are listed below;

- Access to medical or psychological support
- Acknowledgment of harm, apology and an explanation of preventative actions to avoid re-occurrence.
- Monetary remedy, for instance replacement of stolen wages from an exploiter.
- Temporary accommodation options for those needing to leave their current residence unexpectedly.
- Access to food, clothing and essentials
- Alternative safe employment options
- Ongoing pastoral care

Remediation efforts should ideally be guided by the needs of the individual, supporting their recovery whilst preserving their dignity, to ensure a safe and respectful process.

Working in collaboration with all the parties involved will provide a joint remediation solution working through decisions such as funding, method of restitution and rehabilitation to ensure a satisfactory outcome.

RECORDING OF NOTES

All stages of the remediation process should be documented, to provide a clear record of the steps that JDR has taken for the appropriate remediation actions. It shows that we have acted fairly and followed the correct process. The notes can also act as a review document to reflect on to help with future cases.

The remediation record should hold the following details as a guide;

- Date and location of the case (and case/ issue number coordinating with the Complaints Report Register)
- Nature and details of the complaint/ disclosure
- Names of individuals involved (where provided)
- List which parties/ stakeholders are involved
- Date of the remediation meeting & high-level resolutions proposed/ decided.
- Remediation offered and follow through to close.

REMEDIATION POLICY

ON-GOING SUPPORT & MONITORING

It is important for JDR to actively monitor the progress of remediation efforts to ensure that the determined actions have been effective. Additionally ongoing support and care must be provided to those affected by exploitation to aid their recovery and well-being.

If a case has been passed onto an enforcement body, staying in close contact with the relevant authority such as the GLAA, can help support the process as the case progresses and provide updates.

By conducting an annual review of this policy, alongside more frequent reviews of case specific investigation details and remediation steps, can provide valuable insights for handling similar cases in the future. Processes can be amended and/or strengthened from learnings shared among the relevant stakeholders.

COMPLAINTS PROCESS

PURPOSE

At JDR, we highly value our workers and are committed to listening to their concerns, feedback and suggestions. We take all issues raised seriously and will address them promptly and with care, ensuring a swift and thoughtful resolution.

This complaints process provides guidance on the best practices for handling complaints, along with our expectations for addressing them with professionalism and integrity.

SCOPE

The policy applies equally to all employees who work for, or who apply to work for the organisation.

UNDERSTANDING COMPLAINTS

Workers tend to raise a complaint when their expectations have not been met, they express frustration, or they would like to improve the service we provide to them. We prefer that our workers bring their concerns to us directly, rather than either raising them to an external party, or silently leave their employment. We value open communication and want to retain our workforce and use their feedback to improve and evolve our services.

In the recruitment industry, the most common complaints that come through are;

- **Incorrect wages-** this can include a range of issues such as missing hours or holiday pay, incorrect rates of pay or missing payslips.
- **Poor customer service** or mis-representation from a colleague or supervisor- Mutual respect in the workplace for all roles in the company avoids misunderstandings.
- **Mis- communication-** Shift rotas, hours and breaks information, payment of wages process, job details. These need to be clear and understood by workers.
- **Behaviours and conduct expectations** –These must be clearly conveyed in induction or training sessions, H&S rules understood and followed to protect themselves and those around them, workers must feel safe at work.

DEALING WITH COMPLAINTS

We should welcome complaints

Don't let them irritate you, think of it as an opportunity to build a relationship and use the information to take action to prevent it happening again



Take as an opportunity to improve

If you hear a common complaint, tackling it and resolving it well can reduce the number of complaints coming through. It is also great to have fresh eyes on something to contribute to its change.

Be a good listener

Sometimes people just need to feel heard. If they have a complaint. Be approachable and take down all the details and repeat back to them to confirm you have listened and noted the information down correctly.

Use positive & encouraging narrative

Be positive, saying things like "*Lets try and resolve this one for you*". Rather than negative phrases such as "*Its against company policy*" or "*We can't do that.*" Your response matters, delivered in the right way will naturally put the complainant at ease, making the situation calmer.

Thank them for coming to see you.

Logging a complaint

It is essential to maintain a formal record of all complaints, whether minor or serious, to ensure accountability, tracking and resolution, help improve workers satisfaction, and identify patterns. Every complaint must be recorded on the Complaints Report Register, accessible on JDR SharePoint: Compliance & Technical with as much detail as possible and the steps taken to address and resolve the complaint.

It may be that initial details are logged, and then the register is re-visited to be updated as the complaint is addressed, you can reflect this in your notes.

Please remember to close off all complaints.



If the complaint is urgent and requires immediate attention, escalate to management without delay.