Hidden Labour Exploitation Policy Statement

Policy Statement

BE Recruitment Ltd is committed to preventing hidden labour exploitation, modern slavery, forced labour, and human trafficking in accordance with the Modern Slavery Act 2015 and relevant UK legislation. Hidden labour exploitation refers to the abuse of job applicants or workers by third parties—such as individuals or organised gangs—operating outside of the employer or labour provider. This includes, but is not limited to:

- Forced labour
- Human trafficking for labour exploitation
- Payment for work-finding services
- Coercion into substandard accommodation or services

Such exploitation is often well concealed and victims may be unaware or too afraid to report it. BE Recruitment Ltd adopts a zero-tolerance approach to hidden labour exploitation and takes proactive steps to prevent, identify, and respond to any concerns.

Scope

This policy applies to all BE Recruitment Ltd locations and all individuals involved in our labour supply chain, including internal staff, temporary workers, contractors, and suppliers.

Responsibilities

- Branches and on-site teams must ensure this policy is accessible and actively applied in daily operations.
- Managers are responsible for policy compliance and oversight within their teams.
- Consultants and recruitment staff must implement the policy throughout the recruitment and onboarding process.
- The policy will be reviewed annually, or earlier if needed due to changes in legislation, operations, or risk profile.

Policy Commitments

BE Recruitment Ltd will:

- Prohibit the charging of job-finding fees to workers. These costs are a business responsibility and must be borne by the client.
- Vet all individuals and organisations supplying or sourcing labour to ensure no fees are charged to applicants or workers.
- Train recruitment and compliance staff to identify and respond to indicators of third-party labour exploitation.
- Ensure recruitment processes are managed by trusted and trained employees who understand the risks of hidden exploitation.
- Report any suspicions of hidden labour exploitation to the appropriate authorities, including the Gangmasters and Labour Abuse Authority (GLAA), the police, Modern Slavery Helpline: 08000 121 700 or Crimestoppers (anonymous reporting): 0800 555 111
- Promote awareness through posters and information materials in the workplace, with clear contact points for anonymous reporting.
- Provide accessible means for workers to report exploitation, including internal support and signposting to helplines.

- Encourage workers and employees to share information about possible exploitation within their communities, and support them in doing so.

Implementation

To ensure consistent application of this policy:

- Right to Work (RTW) checks must confirm that candidates are using their own bank account.
- A Monthly Shared Details Report is audited by the Compliance Administrator to detect potential third-party control over personal information.
- A weekly audit of the Company's CRM system is conducted by the payroll team to ensure compliance with recruitment and payment practices.

BE Recruitment Ltd remains committed to safeguarding the dignity, safety, and rights of every individual we engage with, and will continue to strengthen its policies and practices in line with legal requirements and ethical standards.

Monitoring and Review

This policy will be reviewed annually, or sooner where required due to legislative, operational, or risk-related changes.

Document Control and Accountability

- Review Date: 25/08/2027
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