

ILLEGAL WORKERS POLICY

Introduction

This policy outlines the Company's commitment to compliance with the Modern Slavery Act 2015 and our commitment to preventing slavery, human trafficking and illegal workers in our business activities.

This policy also details the steps we have put in place with the aim of ensuring that there is no slavery, human trafficking or illegal workers in our own business and supply chains.

Scope

This procedure applies to all employees, workers, contractors, consultants or any self-employed individuals working for the organisation. Localised legislation will be considered when applying this policy in international locations and the necessary amendments will be made.

Purpose

The aim of this policy is to:

- Ensure compliance with immigration laws and regulations
- Prevent the employment of individuals who do not have the legal right to work in the UK
- Safeguard our reputation and uphold ethical business practices

Company Responsibilities

In order for the Company's recruitment practices to comply with legislative requirements, the following steps will be applied for every potential employee/worker before they commence working for the organisation:

- Vetting Process: The HR Team will conduct thorough checks during the hiring process to verify the eligibility of all potential employees. This includes validating work visas, passports, and other relevant documentation
- Training: Appropriate employees will receive training on recognising signs of illegal employment and their duty to report any concerns
- Monitoring: Regular audits will be conducted to ensure ongoing compliance

Employee Responsibilities

- Reporting: Employees are encouraged to report any suspicions related to illegal workers to their immediate line manager or the HR Team
- Cooperation: Employees must cooperate with any investigations related to this policy

Procedure

Right to Work Checks

- Pre-Employment: Before hiring, we will verify the right to work of all candidates. This includes checking passports, visas, and other relevant documents
- Ongoing Checks: We will periodically review existing employees' right-to-work status, especially if their work authorisation has an expiration date
- Sponsorship: The Company will comply with UK Visas and Immigration requirements for all sponsored workers

Due Diligence with Suppliers

- Supplier Relationships: When engaging with new suppliers, we will assess their commitment to preventing illegal employment
- Sanctions: If a supplier fails to meet our standards, we may terminate our business relationship

Record Keeping

All relevant documentation related to right-to-work checks and supplier due diligence will be retained for a minimum of 3 years after an individual cease's employment, or a supplier relationship ends.