



WORKER HANDBOOK 2018

VAN STOMP LIMITED

WORKER CONTRACT FOR SERVICES GENERAL REGULATIONS

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GENERAL RULES AND PROCEDURES

This section contains information relating to various rules and procedures. For the avoidance of any doubt the entire section is deemed to form part of your contract for services with us.

A) CHANGES IN PERSONAL DETAILS

You should notify us of any change of address, emergency contact etc., in order that we can contact them in an emergency and, if necessary, outside normal working hours.

B) MOBILITY

Although you may spend long periods on one site you must be prepared, whenever applicable, to work at any other of our sites. This flexibility is essential to the smooth running of our business.

C) STATEMENTS TO THE MEDIA

You must not make any statement to reporters from newspapers, radio, television etc. in respect of our organisation. Any enquiries should be directed to the Office Manager.

D) WASTAGE, DAMAGE AND LOSS

1. We maintain a policy of "minimum waste" which is essential to the cost-effective and efficient running of all our operations.
2. You are able to promote this policy by taking extra care in the pursuit of your normal duties to avoid unnecessary or extravagant use of our services, materials and machinery, etc.
3. Failure to comply with this policy may result in the termination of your contract.
4. Any damage to our vehicles, stock or property that is the result of your carelessness, negligence or deliberate vandalism will render you liable to pay the full or part of the cost of repair or replacement.
5. Any loss to us that is the result of your failure to observe rules, procedures or instructions, or is the result of negligent behaviour or unsatisfactory standards of work will render you liable to reimburse to us the full or part of the cost of the loss or to correct the work at your own expense.
6. In the event of failure to pay, we reserve the right to deduct such costs from any payment due.

E) TOOLS AND EQUIPMENT

Where applicable, you must provide all your own general tools, equipment and vehicles.

F) PROTECTIVE CLOTHING

Van Stomp Ltd and the customer together are responsible for the provision of your protective clothing, required under the health and safety legislation such as hard hats and safety footwear. However, Van Stomp Ltd provides necessary protective clothing on temporary basis and all articles must be returned by the end of contract. If not returned clean and in reasonable condition (bearing wear and tear) you will be charged the Nett cost +VAT.

G) WORKERS' PROPERTY

No liability is accepted for any loss of, or damage to, property brought onto our, or our clients' premises. You are advised not to take any personal items of value to work or to leave any items at work overnight. Articles of lost property should be handed to your manager or Team Leader who will retain them whilst attempts are made to discover the owner.

H) STANDARDS OF DRESS

As you are liable to come into contact with customers and members of the public, it is important that you present a professional image with regard to appearance and standards of dress. You should wear clothes appropriate to your responsibilities, and they should be kept as clean and tidy as possible at all times.

I) HOUSEKEEPING

Both from the point of view of safety and of appearance, work areas must be kept clean and tidy at all times.

J) MAIL

All mail received by us will be opened, including that addressed to workers. Private mail, therefore, should not be sent care of our address. No private mail may be posted at our expense except in those cases where a formal re-charge arrangement has been made.

K) BUYING OR SELLING OF GOODS

You are not allowed to buy or sell goods on your own behalf on our premises or those of our clients or during your working hours.

L) MONETARY COLLECTIONS FROM WORKERS OR EMPLOYEES

Unless specific authorisation is given by your Manager/Team Leader, no monetary collections of any kind are allowed on our premises or those of our clients.

M) FRIENDS AND RELATIVES CONTACT/ TELEPHONE CALLS / MOBILE PHONES

You should discourage your friends and relatives from either calling on you in person or by telephone except in an emergency. Incoming personal telephone calls are allowed only in the case of emergency. Outgoing calls can only be made with the permission of your Manager/Team Leader. Personal mobile phones should be switched off during working hours.

It is illegal to use a mobile phone without a hands-free set whilst driving. It is our policy that you should not use any mobile phone whilst driving. You should pull over to the side of the road in an appropriate place before making or receiving any telephone calls. In the event of being unable to pick up a call because you cannot find a safe place to park, you must return the call as soon as conveniently possible.

N) PARKING

To avoid congestion, all vehicles must be parked only in designated parking areas. No liability is accepted for damage to private vehicles, however it may be caused.

O) VEHICLE DAMAGE

The following provision is an express written term of your contract of engagement:-

In the event of an at fault accident whilst driving one of our vehicles you may be required to pay the cost of the insurance excess up to a maximum of £250.00.

In the event of failure to pay, we have the contractual right to deduct such costs from your pay.

P) RETURN OF OUR PROPERTY

On the termination of your engagement you must return all our property which is in your possession or for which you have responsibility. Failure to return such items will result in the cost of the items being deducted from any monies outstanding to you. This is an express written term of your contract of employment.

SECURITY

A) RIGHTS OF SEARCH

1. We have the contractual right to carry out searches of workers and their property (including vehicles) whilst they are on our premises or business.
2. If you should be required to submit to a search, if practicable you will be entitled to be accompanied by a third party to be selected from only someone who is on the premises at the time a search is taking place. This right also applies at the time that any further questioning takes place. You may be asked to remove the contents of your pockets, bags, vehicles, etc.
3. Whilst you have the right to refuse to be searched, refusal by you to agree to being searched will constitute a breach of your contract, which could result in its termination.
4. We reserve the right to call in the police at any stage.

B) CONFIDENTIALITY

1. All information that:
 - a. is or has been acquired by you during, or in the course of your engagement, or has otherwise been acquired by you in confidence,
 - b. relates particularly to our business, or that of other persons or bodies with whom we have dealings of any sort, and
 - c. has not been made public by, or with our authority,shall be confidential, and (save in the course of our business or as required by law) you shall not at any time, whether before or after the termination of your contract, disclose such information to any person without our prior written consent.
2. You are to exercise reasonable care to keep safe all documentary or other material containing confidential information, and shall at the time of termination of your engagement with us, or at any other time upon demand, return to us any such material in your possession.

C) USE OF COMPUTER EQUIPMENT

In order to control the use of the company's computer equipment and reduce the risk of contamination the following will apply:

- a. the introduction of new software must be checked and authorised. You cannot introduce new software of any kind without approval from your Manager/Team Leader.
 - b. only authorised individuals are allowed access to the company's computer equipment.
 - c. only authorised software may be used on the company's computer equipment.
 - d. only software that is used for business applications may be used.
 - e. you may not bring software onto or remove it from the company's premises without prior authorisation from your Manager/Team Leader.
 - f. unauthorised access to the computer facility may result in termination of engagement.
 - g. unauthorised copying and/or removal of computer equipment/software will result in the termination of your contract.
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D) VIRUS PROTECTION PROCEDURES

In order to prevent the introduction of virus contamination into the software system the following must be observed:

- a. unauthorised software including public domain software, magazine cover disks/CDs or Internet/World Wide Web downloads must not be used.
- b. all software must be virus checked using standard testing procedures before being used.

E) E-MAIL AND INTERNET POLICY

1. Internet

Where appropriate, duly authorised workers may make use of the Internet as part of their work. You may only release information via the internet with the prior agreement of your Manager. The use of the internet to access and/or distribute any kind of material which is offensive or unrelated to work will result in the termination of your contract.

2. E-Mail

You may only use the e-mail system with the prior approval of your Manager/Team Leader and unauthorised use may result in the termination of your contract.

Workers using the e-mail system should observe the following points:

- a. that company communication standards are complied with (your Manager/Team Leader will advise you of these).
- b. e-mail messages and copies should only be sent to those for whom they are particularly relevant.
- c. e-mail should not be used as a substitute for face to face communication or telephone contact. Flame mails (i.e. e-mails that are abusive) must not be sent. Hasty messages sent without proper consideration can cause upset, concern or misunderstanding.
- d. if e-mail is confidential the user must ensure that the necessary steps are taken to protect confidentiality. The company will be liable for infringing copyright or any defamatory information that is circulated within the company or externally.
- e. offers or contracts transmitted by e-mail are as legally binding on the company as those sent on paper.

The company will not tolerate the use of the e-mail system for inappropriate purposes including:

- a. any messages that could constitute bullying, harassment or other detriment.
- b. on-line gambling.
- c. accessing or transmitting pornography.
- d. transmitting copyright information and/or any software to the user.
- e. posting confidential information about other workers, employees, the company or its customers or suppliers.

F) USE OF SOCIAL MEDIA / NETWORKING SITES

Any work related issue or material that could identify an individual who is a customer/client or work colleague, which could adversely affect the company a customer/client or our relationship with any customer/client must not be placed on a social networking site without express permission. This means that work related matters must not be placed on any such site at any time either during or outside of working hours and includes access via any computer equipment, mobile phone or PDA.

G) PRIVACY AND SECURITY OF PERSONAL DATA

Van Stomp have a comprehensive Privacy Policy which is distributed to all workers and published on our website. We take your privacy seriously and will do all we can to maintain your privacy and keep information we have secure. Your acceptance of our Privacy Policy forms a part of your contract for services. Please note we will take photographs of work being undertaken, for marketing and recruitment purposes and these may be published on our website and social media platforms. When signing your contract you should make sure you have "opted out" of this if you would prefer your image not to be used.

HEALTH, SAFETY, WELFARE AND HYGIENE

A) SAFETY

1. Your Manager will advise you of the health and safety requirements and any hazards associated with your responsibilities.
2. You must not take any action that could threaten the health or safety of yourself, other workers, employees, customers or members of the public.
3. You should report all accidents and injuries at work, no matter how minor, in the accident book, which you should ask your Manager/Team Leader.
- 4) You must ensure that you are aware of our fire and evacuation procedures and the action you should take in the event of such an emergency.

B) SMOKING POLICY

Our policy of not smoking except in designated areas must be observed at all times.

C) ALCOHOL & DRUGS POLICY

1. Under legislation we have a duty to ensure, so far as is reasonably practicable, the health and safety and welfare at work of workers and similarly you have a responsibility to yourself and your colleagues. The use of alcohol and drugs may impair the safe and efficient running of the business and/or the health and safety of our workers and employees.
2. If your performance or attendance at work is affected as a result of alcohol or drugs, or we believe you have been involved in a drug related action/offence, you may be subject to further action and dependent on the circumstances, this may lead to the termination of your contract.

The Company requires all workers to comply with the Alcohol and Drugs Policy.

3. Key Rules

- a. Workers must ensure that they are not intoxicated by alcohol and are free of any illegal drugs when they report for work and that they remain so whenever they are at work;
- b. Workers must not drink alcohol during working time.
- c. The use, possession, storage, transportation, promotion and/or sale of illegal drugs or drug equipment is forbidden during working time, in the workplace or at a customer's site;
- d. Where workers are prescribed medication or are taking over-the-counter medicines or herbal remedies that may affect their work performance or the safety of themselves or others, they must advise the Manager.
- e. Workers may be required to undergo testing for alcohol or illegal drugs in their system in certain defined circumstances.

4. Policy Compliance

- a. The Company strongly discourages workers from drinking any alcohol prior to driving or reporting to work (including at lunchtimes).
- b. Workers must be aware of what they drink and take into account how long it takes for the alcohol to clear their system.
- c. Workers must not drink alcohol during working time. Working time is any time between when a worker reports for work and the time when they finish work. It includes any period of call out done whilst on standby duty or overtime working.
- d. Workers must not have any illegal drugs in their system when they arrive at work or at any time throughout the working day. Individuals taking illegal drugs at any time are breaking UK law and increasing the risks to their health and safety.
- e. The use, possession, storage, transportation, promotion and/or sale of illegal drugs or drug equipment is forbidden during working time, in the workplace or at the worksite and is a breach of this policy and the law. In any of these situations the Company may take further action and, dependent on the circumstances, this may lead to the termination of your contract. The Company will also have a duty report any criminal activity to the relevant authorities.

5. Prescribed Medication

The policy does not stop workers from using prescribed medication, over-the-counter medication or herbal remedies. However, drugs like tranquilisers, sleeping pills, pain-killers, decongestants, cough suppressants, antihistamines (for treatment of hay fever or other allergies) and antidepressants can make people feel drowsy and may affect their work performance or the safety of themselves or others. So, if a worker is taking any medication they should:

- a. Check the possible side effects with their doctor or pharmacist; and
- b. Let a Manager know in confidence, who will, if necessary, make alternative duty arrangements for them.

6. Testing

The benefit of testing is that it provides an objective way of measuring whether a worker has used alcohol or drugs rather than relying on the personal opinion of a colleague.

The test will be carried out by an independent and reputable external screening company, under a tightly controlled procedure, ensuring the results are fair, accurate and objective. Tests are carried out in the strictest confidence and privacy, and with dignity.

A worker may nominate a colleague or trade union representative to witness the test where this is reasonable and practical and the Company will try to arrange this where requested. The Company will take appropriate action in response to any attempt by a worker to falsify a test result and this may result in the termination of your contract.

The Company can be prosecuted if it knowingly allows a worker who is intoxicated or under the influence of drugs to continue working, as this places other people at risk. If a worker is obviously intoxicated or under the influence of drugs, the company will stop using you.

A worker refusing to be tested under the provisions of this policy may be subject to appropriate action including the termination of your contract with the Company.

Workers confirmed to be in breach of the Alcohol and Drugs Policy may be subject to further action and this may lead to the termination of your contract with the company.

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7. Help
If a worker comes forward voluntarily and seeks help for an alcohol or drug problem they will be given help and support by the Company. If the worker thinks they have a problem and may be violating the policy as a result, it is very much in their interest to come forward and seek help voluntarily. The Company will be sympathetic and will ensure they get the help and support they need.

If a worker asks for help, the Company will be supportive in every way possible and can suggest professional advice and help. If a worker volunteers to the Company that they have an alcohol or drug problem they will be treated and dignity, at all times. Any discussions will be in the strictest of confidence.

D) HYGIENE

1. Any exposed cut or burn must be covered with a first-aid dressing.
 2. If you are suffering from an infectious or contagious disease or illness such as rubella or hepatitis you must not report for work without clearance from your own doctor.
 3. Contact with any person suffering from an infectious or contagious disease must be reported before commencing work.
- E) ILLNESS / Absence if you are scheduled to work and you are unable to do so due to illness, you must notify the office as soon as possible on 07568 429914. When you are well enough to return to work should also notify the office.

F) ILLNESS / ABSENCE when working in the Food Industry

When working in a food factory you are required by law to report to your manager conditions which could cause food poisoning:

- If you have any form of stomach upset, nausea, vomiting or diarrhea you must not work, you must report this to your manager.
- After any absence you must report to your supervisor/ manager/ agency prior to starting work. You must be clear of the symptoms for at least 48 hours and have been eating normally for at least 12 hours before returning.
- If any members of your family are ill with diarrhea/ and/or vomiting, you must inform your supervisor even if you feel ok.
- If you have been on holiday (out of the country) you must report to your manager prior to recommencing work.
- If you have boils, sties, septic spots, septic cuts or a nose/throat infection, you may be suffering from a staphylococcal infection which can spread to food and cause food poisoning.
- Any cuts should be covered with the special blue plasters. They are easily visible to the eye and are metal detectable as well as waterproof. No other plasters/ dressings should be used.
- Heavy colds should be reported to your supervisor.

HEALTH AND SAFETY GENERAL POLICY STATEMENT

We at Van Stomp Ltd recognise our duties under the Health and Safety at Work etc Act 1974 and the accompanying protective legislation. We will endeavour to meet the requirements of this legislation so as to ensure that we maintain a safe and healthy working environment. Our managers and supervisory staff are informed of their responsibilities to ensure they take all reasonable precautions, to ensure the safety, health and welfare of those that are likely to be affected by our undertaking.

Van Stomp Ltd recognises so far as is reasonably practicable the duty to ensure the following:

- To provide and maintain a safe place of work, safe systems of work, safe equipment and a healthy and safe working environment.
- To ensure that hazards are identified and regular assessments of risks are undertaken.
- To provide information, instruction and training as is necessary to ensure employees and others are assured of a safe and healthy working environment.
- Promoting the awareness of health and safety and encouraging health and safety best practice throughout our organisation.
- To ensure we are taking the appropriate protective and preventative measures.
- To ensure that we have access to competent advice and are able to secure compliance with our statutory duties.
- To provide continuous improvement in the Organisation's health and safety management and performance.

In order that we can achieve our objectives, and ensure our employees recognise their duties under health and safety legislation whilst at work, we must ensure that we inform them of their duty to take reasonable care of themselves and others that may be affected by their activities. We ensure our employees are informed of their obligations to ensure they cooperate with management and adhere with Van Stomp Ltd safety rules.

HEALTH AND SAFETY REMINDERS

- Keep workspace tidy
- Be familiar with your workplace
- Read labels
- Do what the signs say
- Regular maintenance and servicing of equipment
- Report all accidents, incidents, breakdowns and near misses to supervisor
- Work within Safety Guidelines
- Don't fool around at work
- Use your common sense

Slips Trips and Falls

Most common accidents are from **falling form heights**

Most **slips** are from **wet floors**

Most **trips** are from **untidy work places**

- Liquid spills – clean up immediately
- Footwear – always wear appropriate footwear
- Uneven surfaces – report to your supervisor
- Lose mats – fix them to the floor
- Objects on floor – pick them up or move them immediately
- Bad weather – take care in wet weather and icy conditions
- Cables – reroute cables or use a cable bridge
- Ladders – don't use if not trained to use one
 - inspect ladder before use
 - place on a firm flat surface
 - secure ladder at top and bottom
 - ask someone to hold the ladder
- Desks & chairs – don't use desk and chairs to stand on
- Fixed installations and racking systems – don't climb on them

Use safe working practices and use your common sense

Manual Handling

Lifting, carrying, pulling and pushing

- Lifting – stop and think, assess whether you can lift the object
 - bend knees, keep back straight and lift
 - if to heavy put object down by reverse procedure
- Carrying – always keep load close to body
 - keep heaviest side close to body
- Pushing – make sure your route is clear of obstruction
 - take a firm grip on the trolley
 - use leg power and not your back to push
- Pulling – same as pushing, but should be used as a last resort.

Fire Safety

- know where the **fire exits** are
- know where **fire safety equipment** is located
- be familiar with the **fire safety procedure**
- know where the **fire assembly point** is
- keep all **escape routes clear** of rubbish and obstructions
- In case of a fire – raise the alarm
 - contact emergency services
 - evacuate building
 - use correct fire extinguisher if safe to do so and trained to use

COSHH – Control of Substances Hazardous to Health

Liquids, solids, gasses, powders, dust, vapours, fumes, bacteria, viruses

- Always follow **safe working practices**
- Wear appropriate **personal protective clothing**

PPE – Personal Protective Clothing

Every employer shall ensure that suitable PPE is provided to his employees who may be exposed to a risk to their Health and Safety.

- Clothing must be appropriate to the task
- Clothing must conform to British standards
- Head – hardhats and hairnets
- Eyes – goggles, safety glasses, full face protection for welding
- Noise & hearing – ear defenders or plugs
- Inhalation of fumes – dust mask, breathing apparatus or full face shield
- Hands & arms – gloves, gauntlet, chain mail gloves
- Upper body – high visibility jackets, overalls, thermals, harnesses
- Lower body – trousers, kneepads
- Footwear – toe capped shoes, slip resistant soles
- Specialist disposable gear – only to be used once and then thrown away. It carries a risk of contamination and should not be worn more than once

Electrical Safety

- Report any faults immediately
 - Only work with tested equipment
 - Pay attention to Safety signs
 - Ensure equipment is maintained
 - Inspect cables before switching equipment on
 - Only use CO2 fire extinguishers for electrical fires
 - Don't overload sockets
 - Don't work with faulty equipment
 - Don't use in damp or wet conditions
 - Don't use equipment that you've not been trained on
 - Don't make your own repairs, only a qualified electrician should do this.
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EQUAL OPPORTUNITIES POLICY

A) STATEMENT OF POLICY

1. The company recognises that discrimination is unacceptable. Equality of opportunity is a feature of our practices and procedures and we operate a formal equal opportunities policy. Breaches of the policy will lead to investigation and, if appropriate, further action.
2. The aim of the policy is to ensure that workers are not discriminated against either directly or indirectly on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation.
3. The company will ensure that the policy is circulated to any agencies responsible for our recruitment and a copy of the policy will be made available for all workers and made known to all applicants for work.
4. The policy will be communicated to all contractors reminding them of their responsibilities towards equality of opportunity.
5. The company will maintain a neutral working environment in which no worker feels under threat or intimidated.

B) RECRUITMENT AND SELECTION

1. The company will endeavour, through appropriate training, to ensure that employees making selection and recruitment decisions will not discriminate, whether consciously or unconsciously, in making these decisions.
2. A consistent, non-discriminatory approach to the advertising of vacancies will be adopted.
3. Recruitment will not be confined to areas or media sources that provide only, or mainly, applicants of a particular group.
4. All applicants who apply for work will receive fair treatment and will be considered solely on their ability to do the work.
5. All employees involved in the recruitment process will periodically review their selection criteria to ensure that they are related work requirements and do not unlawfully discriminate.
6. Interview questions will be related to the requirements of the work and will not be of a discriminatory nature.
7. A worker will not be disqualified because he/she is unable to complete an application form unassisted unless personal completion of the form is a valid test of the standard of English required for the safe and effective performance of the work.
8. Selection decisions will not be influenced by any perceived prejudices of other staff.

DISCRIMINATION/HARASSMENT COMPLAINTS POLICY AND PROCEDURE

A) INTRODUCTION

1. Harassment or victimisation on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation is unacceptable.
2. Discrimination and harassment can take many forms but, whatever form they take, they are always serious and totally unacceptable.

B) POLICY

The company deplores all forms of discrimination and harassment and seeks to ensure that the working environment is sympathetic to all of our workers.

C) COMPLAINING ABOUT DISCRIMINATION/PERSONAL HARASSMENT

1. Informal complaint

If you are the victim of minor discrimination/harassment you should make it clear to the discriminator/harasser, on an informal basis, that their behaviour is unwelcome and ask the harasser to stop. If you feel unable to do this verbally then you should hand a written request to the discriminator/harasser.

2. Formal complaint

Where the informal approach fails, or if the discrimination/harassment is more serious, you should bring the matter to the attention of the Managing Director as a formal written complaint.

The person dealing with the complaint will carry out a thorough investigation. Those involved in the investigation will be expected to act in confidence and any breach of confidence will be treated as a serious matter.

When the investigation has been concluded, a draft report of the findings and of the investigator's proposed decision will be sent, in writing, to you and to the alleged discriminator/harasser.

D) GENERAL NOTES

1. If the report concludes that the allegation is well founded, the discriminator/harasser will be subject to disciplinary action in accordance with our disciplinary procedure (if the person is an employee of the company). If the discriminator/harasser is a worker then similarly fair procedures will be adopted before any decision is taken to issue a reprimand or terminate their contract.
 2. If you bring a complaint of discrimination/harassment you will not be victimised for having brought the complaint. However, if the report concludes that the complaint is both untrue and has been brought with malicious intent, you will be liable to termination of your contract.
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WHISTLE-BLOWING POLICY

A) INTRODUCTION

Under certain circumstances, workers are protected from suffering any detriment or termination of engagement if they make disclosures about organisations for whom they work.

B) QUALIFYING DISCLOSURES

- 1) Certain disclosures are prescribed by law as “qualifying disclosures”. A “qualifying disclosure” means a disclosure of information that the worker genuinely and reasonably believes is in the public interest and shows that the Company has committed a “relevant failure” by:
 - a) committing a criminal offence;
 - b) failing to comply with a legal obligation;
 - c) a miscarriage of justice;
 - d) endangering the health and safety of an individual;
 - e) environmental damage; or
 - f) concealing any information relating to the above.
- 2) These acts can be in the past, present or future, so that, for example, a disclosure qualifies if it relates to environmental damage that has happened, is happening, or is likely to happen. The Company will take any concerns that you may raise relating to the above matters very seriously.
- 3) We encourage you to use the procedure if you are concerned about any wrong doing at work. However, if the procedure has been invoked for malicious reasons or in pursuit of a personal grudge, then you will be liable to immediate termination of engagement.

C) THE PROCEDURE

- 1) In the first instance you should report any concerns you may have to the Manager who will treat the matter with complete confidence. If you are not satisfied with the explanation or reason given to you, you should raise the matter with the appropriate official organisation or regulatory body.
- 2) If you do not report your concerns to the Manager you should take them direct to the appropriate organisation or body.

D) TREATMENT BY OTHERS

Bullying, harassment or any other detrimental treatment afforded to a colleague who has made a qualifying disclosure is unacceptable.

STATEMENT

Van Stomp Ltd commits to developing and adopting a proactive approach to tackling hidden labour exploitation.

Hidden labour exploitation is exploitation of job applicants or workers by third party individuals or gangs other than the employer or labour provider including rogue individuals working within these 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 victims, if they perceive of themselves as such, reluctant to come forward.

Coverage

The Policy applies to all van Stomp Ltd sites and to all members of staff that have a responsibility for recruiting and managing workers

Responsibility

Overall responsibility for this policy is with Managing Director, Andrew Watson

All managers and recruiters are responsible to adhere to this policy and to report any suspicions to the Managing Director.

Policy Commitments

Van Stomp Ltd shall:

1. Designate appropriate managers Andrew Watson (Managing Director) and Jaroslav Hamouz (Operations Manager) to attend “Tackling Hidden Labour Exploitation” training and 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. The Company will not use any individual or organisation to source and supply workers without confirming that workers are not being charged a work finding fee.
 3. Ensure that all staff responsible for directly recruiting workers are aware of issues around third party labour exploitation and signs to look for and have signed appropriate Compliance Principles.
 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 Licensing Authority and police.
 6. Provide information on tackling “Hidden Labour Exploitation” to our workforce through displaying posters in van Stomp Ltd offices, worker leaflets and through inductions.
 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 agency workers to report such exploitation which may be occurring within their communities by using our confidential email service help@vanstomp.co.uk
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9. Require labour providers and other organisations in the labour supply chain to adopt policies and procedures consistent with the above.

Internal Promotion of “Stronger Together” Campaign via

1. Training will be Provided to all recruitment staff on the Stronger Together campaign
2. Posters and leaflets will be displayed in the office to encourage exploited workers to come forward
3. Confidential help email put in place that go to the Managing Director direct
4. Recruiters compliance principles signed by all managers

1 Internal Compliance Process

- 1 All workers must complete all paperwork themselves in our office. Blank paperwork cannot leave the office to be completed at home. Workers must not have someone complete the paperwork on their behalf.
- 2 New workers must be asked if they had to pay anyone for work finding services
- 3 Only authorised van Stomp staff can contact workers to offer assignments and workers cannot be forced to work on an assignment.
- 4 Recruitment consultants must not allow any unauthorised agent or individual to introduce workers to van Stomp Ltd
- 5 Recruitment staff must report any suspicious individuals or activities to the Managing Director who will take the appropriate action
- 6 Recruitment staff must not act as a landlord or be involved in the providing of housing, transport or any other paid services to workers

2. New Agency Workers (placed on assignment)

Must have their details checked by compliance prior to placing on assignment. Details of checks are noted in section 3.

3. Compliance team will carry out the following checks:

- 1) Address
 - i. Database searched to establish number of current workers living at the property and if suitable for size of property e.g. 2 bedroom property would cause concern if for example 6 people were currently residing.
- 2) Telephone Numbers
 - i. Database searched to establish if anyone else is using the phone numbers including, mobile numbers, home phone numbers
- 3) NI Number
 - i. Checks made to ensure worker has an NI number and database searched to ensure NI number is not being used by another worker

4) Email Addresses

- i. Database searched to establish if anyone else is using the same email address

5) Emergency Contact (EC) Details

- i. Database searched to establish if the EC is an Acorn worker and if the contact details are used by anyone else i.e. ensuring the same emergency contact is not being used by multiple workers

6) Bank Account

- i. All workers must have their own bank account in their name or a joint name to which they have access, database will be searched to ensure no other person is using the bank account. Workers to sign a consent form if they are not using their own account. Quarterly checks done to check bank accounts

7) Eligibility to Work in the UK

- i. ID verified by compliance team to establish ID is relevant with regards nationality
- ii. Number at bottom of the passport/ID card is checked on our internal system to ensure it is a valid number
- iii. PRADO website used to establish if the ID has been lost or stolen – note this will not apply to all nationalities it is dependent on the country of origin

4. If the checks indicate concerns the following process will occur:-

Depending upon the concern the consultant will request further details from the appropriate division e.g.

a) Housing:

If the number of people living in a property exceeds the number of bedrooms the relevant consultant will be asked to interview all the workers with a series of questions provided by the compliance team

b) Telephone numbers:

Duplication of telephone numbers (unless there is a spouse connection) will not be permitted and the relevant consultant will need to establish who the telephone number belongs to and will require proof.

c) NI Number:

Duplication of NI number will be queried, this is usually a typographical error, however if a worker does not have an NI number they must make an appointment to obtain one and provide Acorn with the details of the NI number, this will remain open as a non-conformance until the issue is closed.

d) Email address:

Duplication of email address will not be allowed; any duplication will require investigation by the consultant.

e) Emergency contacts:

Duplication of emergency contacts will be queried to establish who the person is and the link between the number of workers.

f) Bank Accounts:

Duplication of bank accounts will not be permitted unless proof is established of a joint account where both workers can prove access

g) Eligibility ID:

after investigation by the compliance team any concerns will be directed to the relevant consultant and the worker will not be allowed to work until the details are verified.

h) Excessive Hours:

consultants are responsible for ensuring workers do not work excessive hours (in line with the ETI over 60 hours/week is considered excessive), any excessive hours noted must be discussed with the Hirer and also the compliance team need to be notified. The compliance team will ask consultants to monitor the hours and if it continues the second week interview the worker to ensure they are not being forced to work excessive hours and also to remind them of H&S concerns.

5. Escalation

- Once the consultant has notified the Managing Director of findings if concerns remain the MD will review the situation and if warranted report any findings to the Gangmasters Licensing Authority (if sector specific) and work with the GLA to a satisfactory conclusion.
- If the concern falls outside of the scope of the GLA the Managing Director will make the appropriate decision to notify other external authorities such as Police, Migrant Help, Human Trafficking Centre for support and advice.