

Modern Day Slavery Statement

October 2023

The term Modern Slavery captures a whole range of types of exploitation, many of which occur together. These include but are not limited to:

- **Sexual Exploitation** - This includes but is not limited to sexual exploitation and sexual abuse, forced prostitution and the abuse of children to produce child abuse images/videos.
- **Domestic Servitude** - This involves a victim being forced to work in usually private households, usually performing domestic chores and childcare duties, working long hours for little or no pay.
- **Forced Labour** - Victims may be forced to work long hours for little or no pay in poor conditions under verbal or physical threats of violence to them or their families. It can happen in various industries, including construction, manufacturing, laying driveways, hospitality, food packaging, agriculture, maritime and beauty (nail bars). Often victims are housed together in one dwelling.
- **Criminal Exploitation** - This can be understood as the exploitation of a person to commit a crime, such as pick-pocketing, shoplifting, cannabis cultivation, drug trafficking and other similar activities that are subject to penalties and imply financial gain for the trafficker.
- **Other Forms of Exploitation** – Organ removal; forced begging; forced benefit fraud; forced marriage and illegal adoption.

Red Rock Partnership Ltd (RRPL) operates in accordance with UK legislation and is committed to supporting all workers and protecting them from any form of Modern Slavery or exploitation. RRPL are a partner of the Stronger Together Initiative and a member of the GLAA and the Association of Labour Providers.

As a business, all our permanent employees are fully trained in our companies Standard Operating Procedures and regular audits are conducted to ensure they are always followed. We attend regular GLAA, ALP and Stronger Together workshops and feedback any updates/changes to the business.

Key Senior Managers have attended the 'Investigating Modern Slavery' training course and all permanent consultants have received the Stronger Together training on 'Tackling Hidden Labour Exploitation'. Once they have received the training, they are asked to sign a copy of the 'Recruiter Compliance Document' to ensure they understand the process, and this is held on file at Head Office.

RRPL ensure their permanent consultants receive annual training from the Immigration Enforcement on 'Right to Work and Document Fraud Awareness' with the latest session being delivered in March 2022.

As part of our recruitment process, RRPL conduct formal face to face interviews with all new prospective workers. This consists of a full online or manual check on their 'Right to Work' in the UK along a comprehensive application form to be completed by the individual. This includes but is not exhaustive of previous work history, any unspent criminal convictions and payment information. There is also a 48 Hour Opt Out agreement which is truly optional for the individual to sign, should they wish to work more than the 48 hours in any one week.

Along with this the individual is asked to complete an initial questionnaire focusing on potential exploitation. This covers potential internal exploitation by a RRPL employee and externally through any other business or individuals. They are informed that it is against UK law to pay anyone money to find work within the UK. This also extends to paying money to any persons, company, or agency outside of the UK to get work in this country. They are also shown the Stronger Together presentation to ensure they understand fully what exploitation is and know the reporting process should they feel this is happening to them or anyone they know.

All our locations display Tackling Hidden Labour Exploitation multilingual posters on their notice boards and the same handbooks/ leaflets are issued once the individual starts work.

As well as informing new prospective workers, we conduct regular audits on our current workforce. This is to ensure whilst employed by RRPL they are not subjected to any form of harassment, discrimination, or bullying. Every six months we send a percentage of our workforce a confidential anonymous questionnaire designed to highlight and root out any potential exploitation. The results of this and subsequent actions will be published at our customers site where possible, on our website and in our branches. In the instance that a worker discloses their personal details, anything highlighted that is a concern would be dealt with individually in the appropriate manner.

Our payroll department conduct weekly checks to look for suggestions of exploitation. This includes multiple use of one contact mobile number, multiple occupancy of addresses and they check to ensure all bank details are in the names of the individual worker. We have open dialogue and communication with the GLAA, and over previous years have highlighted potential scenarios to the GLAA where we believe exploitation may be taking place by external parties and these have been investigated formally.

Examples where Red Rock Partnership Ltd have flagged potential exploitation include:

2023 Thus Far

No incidents of exploitation have been flagged this year.

2022

- Multi occupancy in a 1-bedroom flat in Boston. This was picked up on our weekly duplicate addresses check which we conduct at Head Office. We contacted all the individuals and after investigation it was deemed that new address details had not been given to RRPL by the workers.
- Potential physical threats of violence, control, and financial exploitation of a vulnerable worker in Wakefield. In this situation we had reason to believe that the safety of one of our workers was at risk. He attended our office with a friend requesting to change his bank details to his friends. When we informed him these had to be in his own name, his friend got very abusive to both RRPL and our worker. The following day he advised us that he could not attend work due to falling down the stairs and when he did return, he had 2 black eyes. We reported our findings to the GLAA who acted immediately. We then worked with them throughout the investigation along with one of our clients. Thankfully, in this case the GLAA were satisfied that they were not a victim of exploitation.

2020 – 2021

- Multi occupancy in Essex
- Financial exploitation of vulnerable worker in Scotland
- Multi occupancy in Coventry
- Control and financial exploitation of vulnerable workers in the Peterborough and Cambridgeshire area
- Third party impersonating a Red Rock Partnership Ltd temporary worker and attempting to introduce other workers to us
- Signs of third-party control during the recruitment process in Leicester.

Please see below further details around the Leicester incident which took place through thesecond half of 2020 and into 2021.



Gangmasters
Licensing Authority



Leicestershire
Police
Protecting our communities

Red Rock Partnership News:

Working together with the GLAA & Leicestershire Police:

Recently there has been a large group of Hungarian traffickers that were working in and around the Leicestershire area. We are proud to say that through our prompt actions & training—we were able to work with the Police & the GLAA to ensure these perpetrators were caught.

Please see below an email received from Leicestershire Police.

A true partnership approach.

I am the modern slavery Detective Sergeant for Leicestershire Police. As I'm sure you are aware Sarah Churchill and her team have been assisting ourselves with an investigation into the exploitation of Hungarian workers throughout the midlands.

I wanted to make you fully aware of the difference that Sarah, Michael and Ella have made to the lives of the victims. The excellent diligence in terms of identifying signs of modern slavery and prompt actions safeguarded vulnerable persons and assisted in the criminal investigation. Your teams actions have changed vulnerable people's lives and will prevent many more from future exploitation. The team were so helpful at every stage and are clearly passionate about their jobs and about protecting those recruited by Redrock. I can safely say that if other agencies applied the same diligence as Redrock then this type of exploitation would be wiped out, unfortunately they do not.

As a result of the investigation one male has been charged with modern Slavery offences, another 2 are currently serving time in respect of other matters. We are hopeful that further charges will follow as the investigation continues. I would love to be able to go into more detail but due to the future court case I cannot.

*Many thanks
Simon*

DS 1826 Collington

*Modern Slavery & Human Trafficking
Wigston Police Station*

Leicestershire Police



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We are confident that our business, with the processes we have in place is doing everything possible to support our workers and ensure none of the above exploitation is taking place either within our current workforce or those expressing an interest to work with us. We will strive to continue to review and improve, where necessary with the help of our governing bodies.

A handwritten signature in black ink, appearing to read "Matthew Pearl".

Matthew Pearl
Managing Director
Red Rock Partnership Ltd

Date: 13th October 2023

Review Date: 12th October 2024