# COMBATTING FORCED LABOUR, TRAFFICKING AND EXPLOITATION IN THE UK HOSPITALITY INDUSTRY.

## **SEE Formula**

Use the SEE FORMULA to help protect your business and those who work in it

### Scrutinise

Scrutinise – and monitor your relationships with staff and with recruitment and employment agencies. Records, business agreements, contracts and payments can reveal valuable information about possible exploitation. A few additional checks can help ensure you are operating as a responsible employer or user of agency staff.

- 1. Check all staff including agency workers have a written contract.
- 2. Check all staff including agency workers have not paid any kind of direct or indirect fees to obtain work.
- 3. Check and record addresses of all staff including agency workers. Investigate where numerous staff list the same address, indicating high shared occupancy.
  - 4. Undertake background checks on any agency used to recruit or supply staff. Are they reputable?
- 5. Use indicative pricing statistics to assess quotations and fees from agencies offering or charging suspiciously low rates.

#### Engage

Engage - with your workforce. Talking formally and informally with your workforce can uncover whether there are any issues around potential exploitation that you should investigate further.

- 1. Provide training for supervisors and other staff on identifying and remedying risks and vulnerabilities to exploitation.
- Monitor hours worked and have triggers in place to investigate excessive overtime or availability for work on rest days. Ensure recorded hours match hours actually worked.
- 3. Monitor allocation of jobs, work, roles or tasks and prevent any form of discrimination.
- 4. Provide full details to all staff including agency workers of rules surrounding statutory rights, sick pay, holiday pay and any other benefits due.
- 5. Investigate payments by workers to any agency for food, accommodation, uniforms / overalls, transport, laundry or other services.

### Ensure

Ensure - you provide a fit and proper workplace. Clear operational procedures provide a framework for your own staff and supervisors when dealing with agency workers. They can help ensure that problems either do not occur or can be quickly identified and remedied.

- Have a clear recruitment policy with procedures and guidelines in place for the hiring of staff or use of recruitment or employment agencies.
- 2. Supervisors and managers should receive written notification that accepting inducements, or any form of worker maltreatment, coercion or harassment will be regarded as a gross misconduct offence.
- Calculate and then operate to realistic expectations of work to be achieved within timeframes. This should take into account varying patterns of normal hotel use by customers.
- 4. Ensure all health and safety measures are appropriate and accessible to all staff including agency workers.
- 5. Establish a confidential grievance process for all staff including agency workers.

#### www.Staff-Wanted.org

The Staff Wanted Initiative is a project led by the Institute for Human Rights and Business and Anti-Slavery International



