

Concordia Statement on slavery and human trafficking

1. Organisation structure, business and its supply chains.

Concordia is a registered charity which, among other activities, places workers in seasonal work on horticulture enterprises across the UK. The workers are employed directly by the businesses where they are placed. Concordia's mission is to help individuals by providing work placements and similar opportunities to enable them to develop their skills and character and develop their cross cultural understanding.

Concordia is led by its Chief Executive. The Operations team is responsible for the farm placement programme, with 4 office based staff and 2 field staff led by the Operations Manager. The executive is overseen by a board of trustees/directors responsible for strategic oversight and governance.

Concordia has longstanding relationships with a number of GLA licensed businesses in other EU countries which it uses as representatives to support its recruitment. Concordia advertises vacancies on its website but the majority of recruitment is carried out through its third party agents in the European Union

2. Policy in relation to slavery and human trafficking.

Concordia does not tolerate slavery, human trafficking or any form of labour exploitation and takes proactive measures in its policies, practices and procedures to ensure modern slavery is not present in its supply chain. These measures are highlighted in this document.

3. Due diligence processes in relation to slavery and human trafficking in the business and supply chains.

The following are the measures Concordia undertakes to minimise the risk of exploitation in its supply chain for recruiting seasonal workers in horticulture:

- a) Obtains proof of nationality/right to work and retains scan of ID.
- b) Conducts annual audits of third party agents processes focussing on GLA requirements and the recruitment process.
- c) Utilises third party representatives who speak the same language as the worker and is therefore better able to support them when they are in the UK.
- d) Employs field officers to visit farms and office staff to answer calls regarding issues, with a team specifically employed to support workers and growers.
- e) All employing farms are visited and checked by a Concordia field officer before labour is supplied to ensure that suitable work and accommodation conditions are provided.

- f) Farms are checked by Concordia in respect of quality of working and living conditions.
- g) Concordia produces own language posters regarding optional third party representative fees & pastoral support.
- h) Travel insurance is provided for non UK resident workers to add to their security.
- i) Farms working with Concordia must offer accommodation to workers, thus removing the risk of exploitation in the local rental housing market.
- j) People recruited via Concordia are employed directly by farms and not by intermediaries such as gangmasters or agencies, thus minimising the risk of financial exploitation.
- k) Concordia work placements are provided to give continuity of work, as opposed to a short period of a few days, again minimising the risk of exploitation.
- l) A Pastoral fund is available to fund travel for workers when issues arise.
- m) Worker experience is monitored by questionnaire and Field Officer discussion with workers during visits to farms.
- n) Close liaison is maintained with the GLA and ALP in order to understand risks and potential issues in sector.

4. Areas of risk in supply chain and the steps taken to assess and manage that risk.

Risk assessment:

- a) **Agent process**, - All overseas third parties are audited in a face to face visit every year to check processes and compliance with GLA guidelines. The audit covers measures taken to stop unofficial intermediaries acting as unlicensed gangmasters, including not allowing large groups, limiting the number of 'friends' someone can recommend and accompany, questioning how applicants hear about the placement/agent. It also checks there are no financial bonds or connections to a third party loan company. Any fees charged by third party representatives are checked to confirm they comply with GLA licence standards, are not 'work finding', and are optional. Additionally an annual agent conference is hosted in the UK which covers recruitment processes, legislative guidelines, farm visits, and meetings with employers.
- b) **Travel to UK at airport or overland** – clear travel to farm instructions are provided; third party representatives offer support with booking travel; reporting process for non-arrival on farm.

- c) **Other risk of exploitation:** Addressed by worker interview form issued to personal email address.

5. Measurement of Effectiveness.

Number of worker interview forms issued and returned.

All agents audited annually – 100% completion. Action plan issued

Welfare/pastoral support calls logged and measured.

Active checks – Of third party representatives

Field officer visits to farms - outcomes

6. Training.

Awareness raised at regular staff briefings and new staff induction.

Attendance at Stronger Together seminars for key staff

GLA / University of Derby training on line course to be completed by staff – when launched

Concordia, November 2015