



# G's Modern Slavery Statement 2018/19

The statement covers the activities of The Shropshire Group of companies in the UK up to 7th May 2019.

## Introduction

G's is aware of modern slavery risks and acknowledges responsibility to the Modern Slavery Act 2015. We are committed to establishing action plans to reduce incidence of slavery and human trafficking within our own businesses and our supply chain.

We also endeavour to achieve transparency within G's and with its suppliers and focus on continuous improvement. Moreover, G's commits to respecting human rights and will avoid infringing on the human rights of others and will address any issues that are identified. This will include taking adequate measures for prevention, mitigation and, where appropriate, remediation of incidences of modern slavery found in our business and in our supply chain.

## Structure of the business

The Shropshire Group is a group of farming and food processing businesses established in 1952. This Statement concerns all companies within the Group. These Companies are as follows:

Barway Services Limited  
Cambs Farms Growers Limited  
G's Fresh Limited  
G's Fresh Beetroot Limited  
G's Group Holdings  
Littleport Mushrooms Limited  
G. S. Shropshire & Sons Limited  
J. B. Shropshire & Sons Limited  
Sandfields Farms Limited  
The Lettuce Company

Today we supply all the major UK retailers and many in Europe with fresh

salads, vegetables and prepared produce. Across the Group, G's policies and management systems are aligned to our common values and to the aims of ethical treatment of those who work on our sites.

In addition to business units within the Shropshire Group, this approach is extended across a wider sphere of influence including key suppliers, labour providers.

The majority of our products come from our farms, packhouses and food preparation facilities located in the UK, Spain, Czech Republic, Poland, Senegal and the USA. In most of these countries our seasonal workers are mainly employed from abroad. We directly recruit the majority of our seasonal workers. Furthermore, G's provides accommodation, social activities and welfare support on many of its sites.

## Supply Chain

In addition to our own sites, the Group also utilises a range of suppliers from 25 different sourcing countries to ensure year-round supply. Our top 10 sourcing countries by gross sales value during the financial year 2018/19 were:

TOP 10 SOURCING COUNTRIES
UK
SPAIN
SENEGAL
EGYPT
MOROCCO
ITALY
POLAND
GERMANY
HOLLAND
PORTUGAL

## 1. G's OWN BUSINESSES

*The programme of risk reduction within G's own businesses can be summarised as follows:*

*Firstly, to maintain and improve recruitment/onboarding processes and so reduce the likelihood of third-parties to exploit by arranging unofficial and hidden recruitment channels.*

*Secondly, to increase the likelihood of detecting any situation of such exploitation via a programme of widespread training combined with central data analysis.*

*Thirdly, to ensure that should any case occur, there is a clear procedure and responsibility regarding immediate and long-term response - in order to protect both the victims and viability of potential future criminal cases.*

*Fourthly, to embed ownership of the programme at site level, in order to improve engagement and effective policy development.*

*Progress with these aims is summarised below, as well as goals for 2019/20.*

### **1.1 Prevention - Recruitment and Awareness**

*The greatest risk of modern slavery in our business is the occurrence of hidden third-parties engaged in exploitation of our workers via debt bondage, threat, and housing control outside of G's. With understanding of general methods employed by third-party exploiters in mind, certain procedural updates have been implemented to disrupt the efforts of such individuals as far as possible.*

#### **1.1.1 Mapping recruitment channels**

G's has formal HR procedures governing onboarding and recruitment to prevent unlicensed Gangmasters, illegal working, discrimination, or exploitation. These procedures also aim to identify and capture information about informal referral in order to help identify covert labour intermediaries.

This is achieved both using New Starter documentation and via informal semi-structured conversational interviews conducted during the onboarding process. The intention is to revisit potential victims sometime after beginning work, at a stage they are more likely themselves to be aware of any issues. This is now being employed on a risk-assessed basis across the UK Group. Induction materials have been redesigned to be more relevant for their target audience, with the intention of increasing general awareness and triggering reporting through clearly defined avenues in any actual case. These standardised inductions are in place across the UK Group.

1.1.2 An additional training module 'Responsible Recruitment' has been created and delivered internally to those engaging with jobseekers. One primary focus of this training is to enable the identification of hidden recruitment intermediaries as well as other ethical considerations.

1.1.3 Fees and associated costs incurred by jobseekers during the recruitment journey have the potential to cause debt bondage to third parties and are a risk factor for modern slavery. In 2018/19, as a first step towards addressing this risk, tools were developed to map the associated costs of recruitment according to the definition adopted by the IHRB, and data collected across recruitment channels in Shropshire Group operations internationally.

**In 2019/20, risk assessments will be conducted across all Group recruitment streams in order to identify key areas for risk reduction.**

**Additionally, the Responsible Recruitment training module will be brought within the learning management system requirements and delivered to more individuals.**



## 1.2 Detection, Training and Monitoring

*A coordinated programme has been implemented to detect any hidden third-party exploitation affecting those working at our sites or in the areas in which we work. The core principles of this are to produce data regarding warning signs and process this data effectively.*

### 1.2.1 Training

G's delivers an awareness-level training module delivered to key employees who are in regular contact with individuals who might be at risk of exploitation. To ensure sustainability, 21 Site Champions have been authorised to deliver this training in-house, after receiving a 1.5-day training course from the GLAA Academy (Gangmasters Licencing and Labour Abuse Authority).

The roles identified primarily included team/line leaders, those involved in recruitment, accommodation staff and People Forum representatives. The number of people receiving this training to date is 186, with a further 84 receiving a more substantial 'Modern Slavery for HR and Managers' training delivered either by the GLAA Academy or the G's Ethics Team.

### 1.2.2 Detection

The intention of this widespread training was to increase the reporting of potential indicators of exploitation to a central monitoring team who could spot patterns across the Group and escalate issues of concern to the authorities. Reporting is also possible anonymously via our confidential reporting hotline [SpeakUp](#). Additionally, the established annual Staff Survey includes key indicators of potential exploitation, and HR data is also analysed.

### 1.2.3 Monitoring

The system of raising potential indicators of concern has been internally branded the 'yellow flags' system. The system consciously 'sets a low bar' for raising a flag but by doing

so ensures that the central ethics team has early visibility of any emerging issues. Significant numbers of flags have been raised in 2018/19.

In 2019/20 continued efforts will be made to keep reporting levels high. KPI's (Key Performance Indicators) will be produced to ensure that all areas of the business are engaged in this mechanism.

The training programme will continue, and in addition the 'Modern Slavery for HR and Managers' training module will also be made mandatory for those in health and safety positions.

## 1.3 Case Management and Victim Support

*If a case of exploitation is uncovered or suspected, it is crucial to manage the situation effectively in order not to endanger the victim(s) or any future criminal case.*

### 1.3.1 Case Management

Clear avenues of reporting any issues of concern to either the central Ethics team or the Site Champions ensures that the crucial processes recommended by the GLAA regarding case preservation are maintained.

### 1.3.2 Victim Support

In addition, the Site Champions are issued with guidance about how to manage any identified or established victim which is contained in the Site Champions Handbook. This details how to support both potential victims who are awaiting support from the authorities, and those who have been identified and offered referral to the NRM (National Referral Mechanism). With understanding that individual situations are unique, the primary concern of the procedure is to establish a specific point of contact and meet with the individual to establish their needs.





In 2018/19, the Retailer Protocol for Handling Reported Cases of Modern Slavery in the UK Supply Chain was adopted formally into internal policy, in order to clarify reporting processes for the purpose of victim protection.

In 2019/20, increased efforts will be made to improve coordination between parties regarding case management.

In addition, internal victim support guidance will be supplemented by formal procedures and case risk assessment tools.

#### 1.4 Embedding

*G's has a central Ethics team which oversees the development of policies such as the modern slavery strategy. However, the team aims to embed all processes relating to ethical labour management in the site operations themselves, to improve ownership and effective policy development.*

##### 1.4.1 Policy Development

In order to ensure that our anti-slavery procedures are effective and fully implemented, the company formed a Modern Slavery Steering Group, composed of Human Resources and Ethics teams, which is consulted on relevant procedure development and how it could be best implemented in all areas of a diverse business.

##### 1.4.2 'Site Champions'

This steering group has additionally identified responsible parties for each business unit as Site Champions for the prevention of modern slavery.

These Champions received comprehensive training in recognising and supporting victims, as well as in-depth understanding of the issues concerned. In addition to cascading awareness-level training on their site, they are responsible for driving forward the implementation of relevant procedures, raising awareness onsite, and are equipped to react appropriately if a case of exploitation is found - protecting both victim and the criminal case.

In 2018/19, the internal guidelines previously captured in the 'Site Champions Handbook' and other supporting documents have been formalised in a 'Modern Slavery Procedure' for the purpose of clarity and wider communication.

In 2019/20, KPIs will be developed to monitor and ensure consistent application of these procedures across the group.

## 2. LABOUR PROVIDER MANAGEMENT

*Though direct employment is preferred, the G's Group and some of its key suppliers do, where necessary, utilise agencies to supply labour. All of these agencies are subject to significant due diligence and steps are continuously undertaken to improve monitoring and audit processes. These are detailed below, as well as ambitions for 2019/20.*

### 2.1 Audit methodology and agency capacity building

In 2018/19, the Ethical team continued to audit all labour providers serving the group business units as well as its key customers. The audit includes a specific framework used to risk assess the systems used to prevent modern slavery.

The completed assessment feeds into the risk score KPI for a particular agency. The agency is given feedback in the form of an action plan on how to reduce their risk score. Labour users are also communicated the risk score of their agency to inform their choice of agency. A similar process is being undertaken with agencies outside the UK operations, for which additional context-specific audit methodology, including modern slavery systems strength assessment, has been developed. In 2018/19 this has resulted in a measurable reduction of risk relating to agencies in use.



## 2.2 Agency worker voice

The strength of our second-party agency audits lies partly in the combination of documentary with testimonial evidence. Workers from all agencies are interviewed at random while onsite as part of the internal audit cycle and their testimony can in certain cases directly influence the risk score of their agency.

Additionally, sites have access to a multi-language agency 'spot survey' and include agency representatives on G's People Forum committees. These additional communication channels have been implemented at those G's business units which use third-party agencies.

In 2019/20 the modern slavery systems assessment will continue to be used to leverage improvement and updated with emerging risk/best practise.

Agencies will be supported in any third-party certification they seek to achieve, and as industry best-practise standards evolve these will be incorporated into the audit methodologies. Specific and useable audit tools and risk assessment for agencies in non-UK operations will continue to be refined.

## 3. G's SUPPLY CHAIN

*We are primarily a producer business, but do use third party suppliers to ensure constant supply throughout the year. We have taken a number of measures to ensure sufficient due diligence relating to the supply chain including a comprehensive risk assessment of the entire supply chain into the UK down to grower level.*

*This covers all relevant matters relating to ethical labour management, of which modern slavery is a part. Nevertheless, risk factors and mitigation strategies relating specifically to modern slavery are analysed and employed, respectively.*

## 3.1 Supplementary information regarding modern slavery risks

Programmed fresh produce suppliers are requested to undertake a specific Self-Assessment Questionnaire (SAQ) designed to cross-check SEDEX (Supplier Ethical Data Exchange) SAQ's as well as highlight specific factors of risk which SEDEX does not cover. These include factors relevant to modern slavery risk factors such as recruitment practises. Emergency /single use suppliers which do not have SEDEX are risk assessed using the same tool. 80% of suppliers into the UK have completed this SAQ to date.

## 3.2 Capacity building and training in the supply chain

We have requested that all UK production sites in our supply base undertake modern slavery training with Stronger Together or an equivalent provider. Over 75% of these suppliers have provided evidence of this to date.

In 2019/20, we will continue with efforts to increase the proportion of suppliers who have completed this requirement and strengthen ethical due diligence systems for supply chains feeding operations outside the UK.

This statement has been approved by John Shropshire, Chairman of G's Fresh on the 15th September 2019. It will be reviewed and updated annually.

