

Worker Welfare Policy

Worker Welfare at Bradbury Group:

Our aim is to create a safe and healthy working environment for all Bradbury employees. This also includes contractors and temporary labour working on our behalf.

We will treat every individual whether they be a supplier, customer or colleague with the fairness and respect that we expect to be afforded to ourselves and we will ensure compliance with The UK Modern Slavery Act 2015.

Bradbury is committed to developing and adopting a proactive approach to tackling hidden labour exploitation.

Terms and Conditions of employment:

Directly employed full time/part time employees (including temporary workers).

Bradbury recruit by following the standard recruitment procedure all potential employees are screened to ensure their legal entitlement to work by checking and copying a National Insurance certificate, passport or birth certificate.

Bradbury will not employ those claiming unemployment benefits and will work with the Department of Work and Pensions local office to check on the benefit status of an individual where reasonable suspicion arises.

Bradbury will not employ persons less than 16 years of age.

Bradbury will pay all employees by direct transfer into a bank, building society or post office account. This account must be in the employee's name.

Bradbury will comply with maximum hour's legislation and the rules outlined in the Working Time Regulations 1998. Employees are free to sign 48 hour working week opt outs although this is not enforced.

Each employee is issued with a written contract of employment on their first day of employment explaining terms and conditions, including rate of pay, type of work expected, hours of work, any benefits or deductions, holiday and sick pay entitlements.

All Bradbury employees are on pay rates above the National Living Wage. All employees receive an itemised pay statement at the time of payment, detailing gross and net pay and any deductions. Deductions are agreed in advance with the employee or imposed by the authorities.

Maternity and paternity pay is paid in accordance with statutory requirements.

Training and Induction:

Bradbury is committed to staff development and actively encourages life-long learning.

All employees receive full induction training covering site and company safety, environmental and ethical procedures.

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Upon induction all employees will be issued with a Stronger Together leaflet detailing how to recognise and report human trafficking and other hidden third-party labour exploitation.

Temporary workers are provided with an induction, which also includes the issue of a Stronger Together leaflet.

Records are kept of all individual training and are built into skills matrices.

The Company's 'Preventing Hidden Labour Exploitation (Modern Slavery) Policy is communicated and understood by all Bradbury managers.

Ethical Assessment:

Bradbury is committed to adherence to the standards outlined by the Ethical Trade Initiative (ETI) Base Code of Practice.

UK Modern Slavery Act 2015

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.

Terms of Engagement for Employment Agencies/ Temporary Labour Providers:

Before supplying Temporary Workers, it is documented that the following requirements are observed:

Gangmasters and Labour Abuse Authority (GLAA):

All labour providers must be registered with the GLAA. This is a legal requirement and Bradbury will regularly check the licensed status of Labour Providers using the Public Register. It is the responsibility of the Labour Provider to inform Bradbury immediately should they receive a visit or audit from the GLAA or should their License status alter in any way.

Bradbury will adopt a proactive approach to reporting suspicions of hidden worker exploitation to the GLAA and police.

We will provide information on tackling "Hidden Labour Exploitation" to our workforce through workplace posters, worker leaflets, induction, other training.

<u>Health:</u>

Health problems or disabilities (which may requirement specific Health and Safety adjustments) must be reported prior to starting work.

Any recent illnesses such as food poisoning etc., must be reported.

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Recruitment:

Recruitment of Temporary Workers by the agency will be carried out in a fair and non-discriminatory manner.

The process for transfer of Temporary to Permanent workers is transparent, fair and understood by workers.

Bradbury will not use any individual or organisation to source and supply workers without confirming that workers are not being charged a work finding fee.

We will ensure that recruitment and worker placement processes are under the control of trusted and competent staff members.

All staff that are responsible for directly recruiting workers are aware of issues around third-party labour exploitation and what signs to look for.

Other Legal Issues:

The Labour Provider must:

- At the end of each week submit timesheets for all Temporary Workers.
- Submit details on Home Addresses, National Insurance numbers and Dates of Birth.
- Provide details of any sub-contract labour.
- Confirm whether they are VAT registered.
- Confirm that at least the National Minimum Wage will be paid to all Temporary Workers.
- Provide details of their method of payment to Temporary Workers.
- Provide confirmation that provided transport to Temporary Workers receives the necessary safety checks on a regular basis.

All Temporary Workers must have the relevant permits to work and complete the relevant timesheet provided on a daily basis.

Company Rules:

Please refer to the Company Handbook.

General:

Bradbury reserves the right to refuse any Temporary Worker.

All Temporary Workers must have a basic knowledge of the English language to enable them to follow Health and Safety and work instructions.

Bradbury must be given prior warning of any new Temporary Workers who have not previously worked on site.

The Labour Provider must provide all Temporary Workers with clean protective T-shirts and safety shoes Bradbury will provide any exceptional personal protective equipment.

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Health and Safety:

The Company has a fully documented Health and Safety policy, an abridged leaflet version of which is issued to all employees and temporary personnel upon induction.

Risk assessments have been carried out on all site activities and adequate controls have been put in place to provide protection to all persons where there may be a risk to their Health and Safety.

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