



CDS Labour (Agriculture) Ltd Modern Slavery Statement 2022

Introduction

CDS Labour Agriculture Ltd is committed to working to the highest ethical standards and complying with all laws, regulations and rules relevant to our business. Our reputation is paramount, and we take our corporate and social responsibilities very seriously, and this is embodied in our CDS mission statement in which we strive to provide a reliable and fully ethically sourced labour supply at all times.

CDS Labour Agriculture Ltd also fully accept and recognise the importance of both assessing and dealing with the risk of Modern Slavery, and also the impact it has both on individuals and businesses.

Section 54, (Transparency in Supply Chains), of the Modern Slavery Act 2015 requires businesses who have a turnover in excess of £36m, to publish an annual statement to state what actions the business has taken during the financial year to ensure that modern slavery has not taken place within either the business directly, or within supply chains.

Although CDS Labour Agriculture Ltd is at present under the required threshold to make the publishing of a modern slavery statement mandatory, we are fully committed to ensuring that policies and measures are in place throughout the business to both reduce risk, and to help towards eradicating modern slavery, especially within the UK.

To demonstrate commitment, CDS Labour Agriculture Ltd has decided to publish our first modern slavery statement which this refers to the financial year ending on 31st March 2023. It sets out the actions taken to reduce risk within all parts of the business, both internally and externally, including our processes of managing the risk of modern slavery for any worker supplied to any client.

Modern slavery is the severe exploitation of other people for personal or commercial gain and is all around us, but often just out of sight. We all, therefore, have a responsibility to be alert to any risk, however small, and we commit to training our recruitment consultants and managers in what to look out for, so that they may be more aware, report any concerns at the earliest stage.

Our Business

CDS Labour Agriculture Ltd is a GLAA licensed labour provider (CDSL0002) supplying workers to many clients across the UK. The Head Office is based at Chapel Farm Spalding where the family have lived for many years and still to this day farm the land. The CDS managing director Carl Steele has built the business from its early conception where originally only drivers were provided, and there are now currently the following offices and locations both in the UK and abroad:



Branch/Office	Address
Head Office (Spalding)	The Office, Chapel Farm, Hop Pole, Spalding, Lincolnshire
Spalding	1 – 3 Bond Street Court, Spalding, Lincolnshire
Wisbech	1 Harbour Square, Wisbech, Cambridgeshire
Boston	110 High Street, Boston, Lincolnshire
Whitecat	Old Leake Caravan Park, Shaw Lane, Old Leake, Boston
Peterborough	230, Stuart House, St Johns Street, Peterborough, Cambridgeshire
Immingham	Rosper Road, North Killingholme, Immingham
Derby	Pegasus Business Park, Herald Way, Castle Donington, Derby
Maidstone	26 Kings Hill Ave, Kings Hill, West Malling, Maidstone
Preston	The Docklands, Unit 5, Albert Edward House, The Pavilions, Preston
Aberdeen	Cirrus Building, 6 International Ave, ABZ Business Park, Dyce, Aberdeen, Scotland
Sofia	Sofia 1202. Boulevard “Maria Louisa” No. 102. Traffic Market, Office 12, Bulgaria.
Warsaw	1st Floor Solec Residence Biura, ul. Solec street 18/20, Warsaw, 00-410, Poland.
Vilnius	VILNIUS, Lvovo, 2nd Floor, Lvovo g. 105, Vilnius, 8104, Lithuania
Bucharest	Anchor Centre, 26, Timisoara Boulevard, 6th District, Bucharest, 61331, Romania.
Hong Kong	Hong Kong Miramar Tsim Sha Tsui, Unit 1001, 10/F, Mira Place Tower A, 132 Nathan Road, Tsim Sha Tsui, Kowloon, Hong Kong

We supply our workers to many clients across the UK from Scotland to the south coast and proactively work to ensure workers are protected at all times and levels of compliance are achieved and maintained.

CDS do not use agents in order to recruit our workers either within the UK or those from abroad, we only use our own employed and trained staff. Due to the changes in the UK immigration system, recruiting from countries outside of the UK is now more complex and difficult so we ensure that our recruiters are fully aware of what they need to see with regards to any individuals right to work, prior to confirming their employment with CDS.



CDS also do not use any sub-contractors to supply labour to any of our clients, all of our labour is recruited and supplied by us and all workers are contracted with us throughout.

CDS Labour Agriculture Ltd, will not support or deal with any business knowingly involved in slavery, human trafficking or exploitation. We expect and work with all of our clients, to ensure that they operate fair and ethical workplaces, where workers are treated with dignity and respect and the highest standards of human rights are upheld.

Policies & Processes

In order to demonstrate our commitment, we have, since 2019, invested in external specialist assistance to ensure that all of our legal obligations are met in full, and that our processes and policies are reviewed, amended where necessary, and are robust, in order that any risk of modern slavery remains low at all times. Working with our in-house CDS compliance team, Neil Court, director of *nacsolutions*, was the former head of compliance at the Gangmasters and Labour Abuse Authority, and over the past few years has provided much needed advice and guidance, that has enabled us to reduce the risk posed by exploitation and modern slavery. Policies and processes have been created, reviewed and amended, liaison improved with external agencies, and where issues or suspicion has arisen, these have been dealt with quickly and effectively.

Our improved liaison and relationships with regulatory and/or enforcement bodies, has enabled CDS Labour Agriculture Ltd to be much more proactive, reporting any issues immediately, and working collaboratively towards corrective and appropriate action. We have introduced training, both new and refresher, so that we can ensure that our staff recruit in a consistent and thorough way and that they are trained in how to spot and report modern slavery or exploitation.

Our **Modern Slavery Policy Statement** commits us to understanding modern slavery risks and ensuring that modern slavery and human trafficking is not taking place in our business or associated stakeholder supply chains.

This policy statement applies to all persons working for us, or on our behalf in any capacity, including employees at any level, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, external consultants, third party representatives and business partners.

All personnel and stakeholders are made aware of the policy, which is managed by our operations and compliance team. Breaches of the policy will be dealt with accordingly either via disciplinary action or by terminating existing relationships.

We also have a CDS **Forced Labour Policy** which recognises the responsibility that we share with our stakeholders to tackle forced labour. CDS commit to the principles that are drawn from ILO Conventions, Protocols, Recommendations and Instruments such as the Declaration on Fundamental Principles and Rights at Work and the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, the UN Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, and the UN Guiding Principles on Business and Human Rights.

The principles address businesses and aim to provide clear and practical interpretation of international labour standards. They should be applied by all CDS stakeholders.



This policy will apply to all CDS staff and stakeholders, and where appropriate their respective supply chains. CDS are also fully committed to compliance with the ETi Base Code and as such we have an **ETi Base Code Policy**.

The ETi Base Code is founded on the conventions of the International Labour Organisation (ILO) and is an **internationally recognised code of good labour practice**. It is viewed as a global reference standard and is widely used as a benchmark against which to conduct social audits and develop ethical trade action plans. The Code was also the basis for the GLAA Standards, against which CDS are regulated as a Licensed business. As part of our requirement to retain our GLAA Licence we must maintain compliance against these standards and similarly therefore against the ETi Base Code.

Our **registration process** informs each worker we recruit, how to get help should they experience any issues of exploitation and/or modern slavery, and we provide both contact numbers for various organisations that can help and also all workers have access to a 24/7 **confidential helpline**.

Our **Whistleblowing Policy** advises workers how they can raise issues without detriment, providing alternatives if they are not comfortable with raising these via their manager or supervisor.

Aside from cascading this information at the recruitment stage we also ensure that workers have access to all of this information at all times, and posters are placed on notice boards at client sites to assist workers if they need help urgently.

Awareness & Training on Modern Slavery

As previously indicated, we have invested in external help in order to reduce the risk of Modern Slavery, and as such we ensure that all of our recruitment staff are fully trained to be able to spot and report the signs at the earliest possible stage. Refresher training is also delivered periodically to ensure that we operate in a consistent way and our processes and policies are rigorously checked both externally and internally via regular audits. We are members of **SEDEX** and have undergone, at our own expense, a SEDEX 2 Pillar **SMETA** audit, which on completion only revealed a couple of minor issues which were addressed with immediate effect. SEDEX allows our customers, who are SEDEX members to view our audit, so that we can operate in a fully transparent way at all times.

We work closely with the **Gangmasters & Labour Abuse Authority (GLAA)** and regularly attend meetings and webinars sharing our input and experience with other labour providers, labour users and other stakeholders such as retailers. In 2022 the GLAA completed a compliance inspection on our business and our licence remains unchanged, full and with no additional conditions.

We work with the **Association of Labour Providers** as an active member attending training courses as required and ensuring that we keep fully up to date with any changes in legislation that may affect our business. We are members of **Stronger Together**, and now a Stronger Together champion and our Operations/Compliance manager recently successfully completed the **Introduction to Responsible Recruitment** course.



CDS Labour Agriculture Ltd Incident Process

Although at present we consider that our risk of encountering modern slavery within our business is low we cannot be complacent about our actions and processes.

Modern Slavery can happen anytime, and anywhere, and if discovered or suspected it is important that we have a robust process in place to deal with it and that our staff are trained to deal with it efficiently and effectively. CDS will now introduce the incident process policy and guidance below, in order to ensure that we have a clear structure that will be cascaded to all personnel about what action they must follow in the event of an actual or suspected case of modern slavery.

Aims and Objectives 2022/23

CDS Labour Agriculture Ltd will commit to reviewing all existing processes and policies in relation to modern slavery and to ensure that the risk remains low throughout the business and supply chains. We intend to implement the following:

- Ensure that our Modern Slavery Policy Statement, Forced Labour Policy, ETi Base Code Policy and Incident Process is cascaded to all personnel within the business both internally and externally
- Continue to attend relevant training commencing with Tackling Modern Slavery in UK Businesses (ALP Course scheduled for 24th November 2022 Compliance Manager & Compliance Consultant to attend)
- Review our existing induction in relation to modern slavery to ensure all staff are fully appraised of awareness training on how to spot the signs
- Fully introduce our incident process policy and guidance to all relevant staff to ensure we have clear guidance and an assigned lead for any identified issue
- Continue to liaise and work with regulatory and enforcement bodies in order to reduce risk and to assist with any identified cases of Modern Slavery and/or Exploitation.

This statement was reviewed and approved by **Carl David Steele** Managing Director of CDS Labour Agriculture Ltd

The statement will be reviewed annually and published

Signed



Dated 01/01/2023

