

G's – Mapping recruitment pathways and fees to support migrant workers



G's Fresh is one of Europe's leading fresh produce suppliers. The Group has operations across the UK, Spain, Poland, Czech Republic, West Africa and North America comprising 32 sites, and employs over 10,000 colleagues. G's provides a wide range of fresh produce including celery, salads, radish, mushrooms and onions; supplying to many of the major UK supermarkets.

Summary

Across their UK sites, G's relies on the annual recruitment of approximately 3,000 seasonal migrant workers from various countries, which presents widespread and variable risks, and so responsible recruitment is a crucial point of focus in the business' human rights strategy.

There has been significant public scrutiny regarding the potential exploitation of workers employed in the UK through the Government's Seasonal Workers Scheme (SWS), with reports and newspaper articles highlighting 'severe' risk of exploitation including risks of debt bondage due to relocation costs and illegal recruitment fees.

G's has invested significant resources to detect and disrupt modern slavery and exploitation in UK and wider European supply chains in recent years. One key element of this approach has been to build understanding of the seasonal worker recruitment pathways, their experience and the fees that they pay on their journey to employment. In particular, G's sought to understand more deeply the different fees that may be charged in each of the source countries for workers arriving on the SWS in order to be able to challenge illicit fees, ensure workers are well informed on what they should expect and that labour providers are carrying out thorough due diligence on their recruitment agencies so that they are confident agencies are treating workers fairly.

This work is having a significant wider impact on the industry as G's share their learnings with labour providers, customers, collaborative groups and The SWS Taskforce, which all supports the industry to make improvements, raise awareness and drive positive change.



This case study has been developed with the support of Co-op as part of Co-op's 2024 'Treating People Fairly Awards' at which G's was a winner. The awards celebrate excellence in human rights practice, encourage suppliers to learn from each other and inspire new ways of mitigating current or future risks to worker welfare. Supplier entries were assessed by an independent, expert panel and awards were presented at a Co-op supplier event in May 2024. Click [here](#) and [here](#) to learn more about Co-op's approach to human rights.



Taking action

In order to enhance the effectiveness of the due diligence process, Worker Recruitment Interviews and an accompanying Reporting Tool have been developed and implemented. The interviews and the tool help to build an understanding of country and labour provider risks and of correct processes and expectations for workers.

Initial research

Considerable research was conducted, together with SWS Operators (who are the labour providers), to identify the different recruitment processes and map all costs presented to workers at various stages of recruitment, through every pathway to work at G's. This included, for all sourcing countries, the services workers' pay for, how they pay and to whom. It also included a full map of visa processing services, with all the additional legal paid services on offer, giving a clear picture of the range of legal costs an applicant may face in the entire recruitment process from each sourcing country. The objective was to identify where correct processes are being followed, where illicit intermediaries are present and the true costs to workers via the scheme, highlighting risk areas and opportunities to drive positive change.

As part of G's responsible recruitment due diligence, key team members have travelled to recruitment days with SWS Operators in three source countries in 2023 and 2024. This enables the team to experience initial recruitment activities first hand, gain further insight into recruitment processes and speak to workers at the first point of contact. This also led to workers developing increased trust and openness with G's representatives when they arrive in the UK.

Worker Interviews and Reporting Tool

The data from the research and mapping has been used to build the Reporting Tool. Worker interview data is put into the tool to identify potential issues. For example, the total amount workers have paid through the process in their currency can be inserted and this is then shown in GBP, with a comparison to the known benchmark of total legitimate fees and additional costs, such as fast track and translation

services in that country. The tool immediately flags if the benchmark of total appropriate and legal costs reported by an individual has been surpassed, helping to identify where illicit payments may have been made, and at what point in the recruitment process.

An onboarding form, which is completed when workers do the right to work checks, is used as a first risk indicator flagging tool and includes questions on who the SWS Operator was and how much the worker has paid to get from their country to the G's site for work. This flags up the workers who G's will follow up with a face to face interview. The worker interviews include questions about the recruitment pathways (source countries, third party agent, SWS Operator), the recruitment processes and related costs, in order to assess legitimate and illegitimate fees as well as mapping where, when and how workers are paying. In 2023, 14% (408 people) of G's seasonal workforce were interviewed. If a potential concern is found with one worker, more workers from that country and recruitment path are interviewed to triangulate information and try to understand the scale of the issue.

How the data is used

If an illicit payment or another concern is flagged up, G's present the evidence to the SWS Operator and agree steps and timelines to resolve the issue. If it is felt that there is insufficient progress or commitment and/or where appropriate, the issue will be reported to the Gangmasters and Labour Abuse Authority (GLAA) and the information is shared in an appropriate form with various industry stakeholders such as the [Food Network for Ethical Trade \(FNET\)](#) and [Modern Slavery Intelligence Network \(MSIN\)](#).

In 2023, this process fed into G's internal in-depth Recruitment Risk Assessment, weighing up the risk of different SWS Operators, third-party agents and various source countries. This informed planning for 2024 labour, ensuring safeguarding of returnees and new applicants and the findings were also shared with SWS Operators. The information was also used to inform and improve their internal capacity building, labour provider audits and intelligence management system.

Taking action

'Yellow flags'

G's has an effective system of identifying 'yellow flags' that seasonal workers and permanent employees should be looking out for, and a process for them to easily report those observations. These are potential indicators to notice which seem unusual or which don't feel right, even if there isn't firm evidence of worker exploitation (for example, someone in the canteen with no food and looking dishevelled). Seasonal and permanent workers and supervisors are all trained on this. The information is reported quickly to the internal Ethics Team, who use an intelligence matrix to cross check and escalate where necessary.

G's has recently reviewed and updated their 'yellow flag' reporting of issues or potential indicators of modern slavery and exploitation to be more instant, efficient, and accessible in all areas. This system of 'yellow flags' is something other food suppliers using seasonal workers can consider implementing.

Information for workers

Workers receive responsible recruitment information at induction, which has been enhanced based on this research, emphasising the importance of reporting any concerns or issues and what would be done with the information. The internal communication is ongoing in the form of posters in accommodation and on notice boards, leaflets, and toolbox talks, which are informal briefings that can cover daily activities, health and safety or worker voice updates and reminders.

Workers are provided with a detailed guidance document (which has been translated into 11 languages) on appropriate expectations in recruitment processes and costs. It also prompts them to report any violations to the Ethics department, their line leader or manager or via Speak Up, whether they are currently in employment or during the following year's recruitment process. This is also shared with individuals contacting G's directly requesting employment via the SWS, directing them to safe recruitment channels.



"Through worker interviews and recruitment risk assessments, we've unearthed invaluable insights that not only inform our recruitment decisions and processes but also empower us to mitigate potential risks, fostering a safer and more productive workplace culture."

- Will Goosen, G's Hostel BSL, General Manager, Seasonal Recruitment & Accommodation

Moving forward

Following the 2023 programme, G's reviewed the wording of the worker interview questions to be more understandable for workers of various nationalities and cultures. The interview process and automation has been streamlined with regular governance checks and reviews throughout the 2024 season.

G's will continue to share their learnings and experience with their customers, other supplier businesses through FNET, share relevant data with MSIN, and continue to actively participate in the SWS Taskforce, to encourage other businesses to improve their understanding and ability to detect and disrupt exploitation.

Making an Impact

Various situations of worker exploitation have been detected and disrupted through this system, which results in future workers being safeguarded through those channels.

Feedback from workers has been very positive, expressing appreciation for being listened to and feeling understood, that their experiences are important and their safety is prioritised, and enabling workers to share appropriate expectations with friends and family, which hopefully limits exploitation moving forward.

G's have gone on to share this industry-leading project, and the specifics of how it was done, with many businesses via multi-stakeholder organisations such as FNET and MSIN, in order to support the industry to make improvements, raise awareness and drive positive change. Specifically sharing information and learnings within the FNET responsible recruitment working group and also the [SWS Taskforce](#) is helping to widen impact.

Knowledge sharing with SWS Operators helps close gaps on areas of risk and/or eliminate key issues within recruitment processes and channels. G's has reflected findings to Operators in corrective action plans and adhoc as they discover potential or real issues. Operators positively receive information they share, as well as reports of issues. Mostly, Operators see this as a benefit in that it enables an additional review of processes and enables them to address and improve.

Lessons learnt

- Incorporating worker voice and experiences is crucial to developing meaningful and actionable change. Foundations for effective due diligence initiatives and for achieving positive change include a culture of trust and openness and worker centric decisions being put into action.
- It is the responsibility of all employees and staff to safeguard workers and potential applicants and empower the business to act proactively and prevent issues, rather than simply detect and react. Internal awareness and collaboration across the business is key.
- Identifying issues within different recruitment journeys and having the opportunity to resolve them starts with asking workers a simple question to open dialogue about their experiences. G's used multiple methods for dialogue including recruitment-focused questionnaires at onboarding, worker interviews and worker voice, whilst also empowering their workers with information and encouraging team leaders to engage with workers on the topic and fostering environments of trust and openness.
- All colleagues have mandatory requirements to complete modern slavery training, with key stakeholders completing more bespoke, detailed responsible recruitment training.
- G's well-developed system of 'yellow flags' enables them to identify and address potential issues early, before the full impacts are realised.

This is a leadership* approach because:

Proactivity

G's chose to face into the exploitation risks that the Seasonal Worker Scheme presented, investigating potential issues within the various complex recruitment channels, taking a more holistic view and reaching in to issues beyond their direct employment responsibilities.

Ownership

G's ensure that every site has ownership and accountability on ethical working and human rights, with extensive capacity building through five focused training modules for colleagues on ethical practices and modern slavery as well as consistent, regular knowledge sharing, engagement and governance across the organisation.

There is also consistent communication and capacity building on human rights and responsible recruitment with workers at their sites; prioritising psychological safety and trust to encourage them to communicate and report any concerns, issues or violations.

Partnership

This project's success has required significant partnership working with the SWS Operators and labour providers, workers and customers, as well as with other suppliers facilitated through FNET and MSIN.

*Key behaviours that Co-op champion in its supply chain are proactivity, ownership and partnership. Click [here](#) to learn more about Co-op's supplier engagement programme. Co-op's 'Supplier's Guide to Ethical Trade' sets out the standards suppliers are expected to meet.