



Child Labour Policy

BARFOOTS

Sefter Farm, Pagham Road, Bognor Regis, West Sussex PO21 3PX

Objective:

To eliminate and prevent the use of child labour within our UK operations and supply chains, in compliance with UK laws, International Labour Organization (ILO) guidance, and global best practices. This policy prioritizes the welfare, education, and rehabilitation of affected children and aligns with the requirements of the **Children and Young Persons Act 1933**, the **Modern Slavery Act 2015**, and other relevant legislation.

Policy

1. Commitment to Zero Tolerance

We are committed to eradicating child labour in all forms. This includes ensuring that no person below the minimum age for employment, as defined by UK law and ILO standards, is engaged in any capacity in our vegetable farm and factory operations.

2. Definition of Child Labour

In the UK, child labour refers to work that:

- Is carried out by anyone below the school leaving age (the last Friday in June of the academic year when the child turns 16).
- Violates legal restrictions for children aged 13–16, including hours, type of work, and working conditions, or those defined under local authority permits.
- Interferes with the child's education or physical, social, or moral development.

3. Focus on Best Interests of the Child

All remediation actions will prioritize the best interests of the child, emphasizing access to education, psychological well-being, and support for families to prevent future child labour involvement.

4. Compliance and Monitoring

We will conduct regular monitoring and audits to ensure compliance with UK laws, including local authority employment permits and working hour restrictions, across all operations and supply chains.

Process for Remediation

1. Identification of Child Labour

- Conduct regular risk assessments and unannounced inspections of UK farm and factory sites.
- Implement confidential reporting mechanisms (e.g., hotlines, digital reporting tools) for employees and community members to report suspected child labour.

2. Verification of Cases

- If a case is reported or identified, promptly investigate through interviews, document checks (e.g., birth certificates, school enrolment records), and site inspections.
- Collaborate with local authorities, child protection services, and NGOs to confirm and address the findings.

3. Immediate Actions Upon Verification

- **Remove the child from work immediately** in a safe, non-stigmatizing manner.
- Notify the local authority and child protection services, as required under the **Children Act 1989** and related safeguarding regulations.

4. Development of a Remediation Plan

- **Educational Support:**
 - Ensure the child is reintegrated into full-time education, either through local schools or alternative education programs.
 - Provide support for school fees, materials, and transportation if necessary.
- **Family Support:**
 - Assess the family's financial circumstances to determine underlying causes of child labour.
 - Provide support such as employment opportunities for adults, financial aid, or connections to local government benefits like **Universal Credit** or **Child Benefit**.
- **Health and Psychological Support:**
 - Arrange access to healthcare and counselling services for the child, collaborating with the National Health Service (NHS) and local charities.

5. Preventative Measures

- **Community Awareness Campaigns:** Partner with local councils and community organizations to educate families about the risks of child labour, their rights, and legal requirements.
- **Strengthening Recruitment Practices:** Require all employees and contractors to provide verified proof of age and eligibility to work.
- **Supplier Agreements:** Embed strict child labour compliance clauses into all contracts, with audits and enforcement mechanisms.

6. Monitoring and Follow-Up

- Conduct regular follow-ups with the child and their family to monitor the effectiveness of remediation measures and prevent recurrence.
- Maintain detailed records of all cases and remediation activities to enhance accountability and continuous improvement.

7. Escalation of Severe Cases

- In cases involving trafficking or exploitation, collaborate with local law enforcement and the **National Referral Mechanism (NRM)** for victims of modern slavery.
- Ensure compliance with the **Modern Slavery Act 2015**, providing transparency through public reporting on remediation actions.

Governance and Accountability

- The UK Corporate Social Responsibility (CSR) team, along with HR and Operations Managers, will oversee the implementation of this policy.
- External audits and third-party evaluations will assess compliance annually.
- Suppliers failing to meet these standards will face penalties or termination of contracts.

Review and Updates

This policy will be reviewed annually, or sooner if changes occur in UK legislation, local authority regulations, or international standards, ensuring ongoing relevance and compliance