



CROPWELL BISHOP CHILD LABOUR POLICY AND PROCEDURE

HISTORY AND ORIGIN

Cropwell Bishop Creamery (CBC) is an independent family-owned company. The Company manufactures Blue Stilton, White Stilton, Speciality White Stilton and Blue Shropshire cheeses.

CBC has been in its current ownership since 1950. When it was acquired by the Skailes family, it was a small, though long-established creamery mainly engaged in the manufacture of cheddar and territorial cheeses. Over the years the creamery has focused on making Blue Stilton (and its white stilton variants), and Blue Shropshire.

1 SCOPE

This policy and procedure applies to all jobseekers and workers within the business whether internal staff and management, or supplied by a Recruitment Intermediary (or sub-agents) or sub-contracted Labour Provider.

2 RESPONSIBILITY

The staff in the following roles are responsible for implementing this policy and procedure:

- 2.1 All staff are responsible for upholding the commitment to ensure that no child labour is used.
- 2.2 Human Resources & Payroll Departments are responsible for:
 - Establishing that all jobseekers' ages are above the basic minimum age before they start work or before migrant jobseeker's travel.
 - Recording evidence in workers' personnel records.
 - Escalating cases to a relevant senior manager where it is suspected or identified that a worker younger than the basic minimum age has been recruited or has applied to work.
- 2.3 Human Resources and Departmental Managers are responsible for:
 - Managing cases where it is suspected or identified that a worker younger than the basic minimum age has been recruited or has applied to work.
 - Continuously improving the way, the business ensures that no child labour is used.
- 2.4 Departmental Manager, Human Resources and Payroll Departments are responsible for:
 - Carrying out appropriate due diligence where Recruitment Intermediary(s) or sub-contracted Labour Provider(s) are used, to ensure no child labour is used.
 - Confirming and agreeing with client(s) that no child labour will be used.

3 POLICY

3.1 Policy statement:

CBC believes that child labour is a form of exploitation and a breach of international human rights laws. It deprives children of their childhood, their potential, and their dignity, interferes with their education and is harmful to their physical and mental wellbeing.



We will not tolerate the recruitment or use of child labour in any of our operations and expect the same commitment and practice from any of our business partners.

This policy is fully supported by senior management and has been agreed with any worker representatives.

3.2 Policy commitments:

Our business commits to comply with the legal and other requirements listed below:

- Child Labour (Prohibition & Regulation) Act, 1986
- No worker under the age of 16 is recruited or employed/engaged in our business or labour supply chain.
- Where migrant workers are recruited in their country of origin, no worker under the age of 18 at the date of travel, will be recruited or employed/engaged in our business or labour supply chain.
- No worker under the age of 18 will be recruited or deployed to undertake hazardous work (any work which is potentially hazardous or injurious to their health, safety, mental well-being or development).
- Where child labour is suspected or identified, it is remediated in the best interests of the child.

4 PROCEDURE

The following activities and decisions are required to implement the policy commitments:

4.1 All relevant staff are trained and/or have the knowledge and skills required to uphold our commitment that no child labour is used. The required knowledge and skills include those necessary to understand:

- The legal definition of child labour, including hazardous work and light work.
- The requirements set out in this policy and procedures, current and relevant national laws and guidance as well as relevant social compliance standards and client requirements.
- The risks related to child labour and recruitment of children into hazardous work.
- When and how to escalate potential issues.

Additional knowledge and skills required for those staff responsible for establishing jobseekers' ages prior to recruitment, include an understanding of the legal and allowable documents that establish workers' ages and how to establish a worker's age when such documents are not available.

The additional required knowledge and skills for relevant senior managers responsible for remediating identified or suspected cases of child labour include those necessary to:

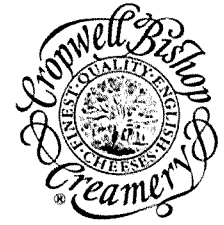
- Understand the business procedure for remediating cases of child labour.
- Become familiar with existing guidance for remediating child labour including:
 - ILO-IOE Child Labour Guidance Tool
 - ETI Base Code Guidance on Child Labour
 - Impact Operational Procedures for Eliminating Child Labour in Industrial Contexts.
- Investigate and remediate potential causes of child labour in an unbiased and professional manner, ensuring that the child and their family is protected.
- Continuously improve the method of ensuring no child labour is used.

Additional knowledge and skills required for relevant managers/consultants] include those necessary to:

- Carry out appropriate due diligence with Recruitment Intermediaries or sub-contracted Labour Providers to ensure that no child labour is used.



- Work collaboratively with clients to ensure that no child labour is used.
- 4.2 This policy and related laws and social compliance standards are communicated to all workers, jobseekers, staff and managers at application and subsequently annually or whenever there is a key change. Key points in our communications include our policy statement and commitments.
- 4.3 It is established that all jobseekers are above the basic minimum age before they start work or before migrant workers travel:
- As part of the application process, each jobseeker is asked to present an original identity document that establishes their age e.g., passport, birth certificate or identification card. It is made clear on the application form that those without such documents cannot be accepted and should not apply.
 - All documents are checked to ensure that the worker is older than the basic minimum age of employment, and that the document is genuine (not fake, tampered with or false) by checking that it has no reasonably apparent signs that it is forged, pseudo or counterfeited, and that it appears to belong to the document holder.
- 4.4 Copies of all documents that establish the worker's age are taken, and held in the worker's personnel record.
- 4.5 Where Recruitment Intermediaries, or sub-contracted Labour Providers are used, and we cannot establish workers ages directly before they start work or travel, appropriate due diligence is carried out including:
- Agreement of a signed operational service level agreement including:
 - Confirmation of the basic minimum age for workers and migrant workers.
 - Assignment of the responsibilities for establishing the jobseeker is above the basic minimum age.
 - Assignment of the responsibilities for covering the cost of remediation of child labour if identified.
 - Before authorising the acceptance of their services, checking that the relevant business has a system to effectively establish jobseekers' ages. Where they do not have this in place, provide training and support.
 - Before jobseekers start work, or migrant jobseekers travel, ensuring that the relevant business has sent you a copy of evidence that establishes that their age is above the basic minimum age. Record this on the worker's personnel file.
 - For Recruitment Intermediaries, once migrant workers arrive in the destination country, establishing the workers' legal eligibility to work directly.
 - Carrying out regular checks on the relevant businesses' practices to identify any issues or where improvements are required.
- 4.6 Where age verification establishes that a worker is under 18 years old (and above the basic minimum age) this is recorded and the relevant staff (including Labour User staff) are notified to ensure that the worker is not deployed to undertake hazardous work.
- 4.7 All workers, jobseekers and staff understand how to, and can raise grievances, complaints, concerns, suggestions and ideas related to child labour, and are able to access remedy.
- All such issues are dealt with confidentially and anonymously (where requested) and workers reporting issues are protected from detriment.
- 4.8 Where it is suspected that a worker is already working, or a jobseeker is applying for a job, who is younger than the basic minimum age, the issue is escalated to relevant senior manager.
- The relevant senior manager will:



- For jobseekers, provide the individual with a fair further opportunity to demonstrate their age.
- For existing workers, repeat steps to verify the worker's age as part of a routine check.

When it is identified or suspected (and the age of the worker cannot be established) that a worker or jobseeker is under the basic minimum age, the relevant senior manager acts to investigate in a timely, professional and unbiased manner ensuring that:

- The best interests of the child are the primary consideration.
- Any remediation does not make the child and his family more vulnerable to harm or abuse.
- Appropriate child labour and protection experts are involved as needed.

Any action taken by the relevant senior manager accords with the following key principles:

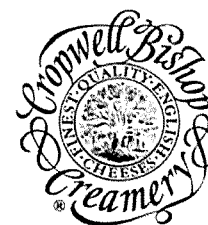
- The situation is explained to the child (and where possible the family/guardian) in a language they understand.
- It is ensured that the affected child is safe (with their family, a guardian, or your business) and protected from more harm, vulnerability or abuse.
- The contact details (telephone number and family address where possible) of the child and their family are confirmed, wherever possible, so that contact can be maintained.
- Any indicators that the child is a victim of human trafficking or criminal activity are reported to relevant law enforcement and organisations who provide support for victims.
- For existing workers, where possible the work is adjusted so that it is no longer child labour by continuing to employ/engage the child to undertake age-appropriate, non-hazardous work. Where this is not possible, the child is prevented from further work, but is protected from loss of income either by:
 - Continuing to receive their normal wage for a specified period while the case is being investigated and remediated, or:
 - By offering the child's job to a qualified adult member of the family.
- A detailed investigation is initiated without delay, to identify the root cause of the child's involvement in child labour and how best to remediate. As part of this investigation:
 - Consultation takes place with the child and their family/guardian to understand their needs.
 - Alternatives are identified, and next steps agreed with the child and their family. Where possible (and with agreement) this includes working with community leaders, schools, NGOs, child protection agencies or law enforcement as appropriate to ensure the child has access to appropriate services and support.
 - Existing workers are supported to start/resume education.
 - The business is checked for any other cases of child labour.
- The identified and agreed remediation is carried out, and regularly monitored and reviewed to adjust or make improvements as required.
- Learnings are taken from the investigation to ensure that cases of child labour are prevented in future.

5 MONITOR, REVIEW AND IMPROVE

The Managing Director is responsible for the continuous improvement in the ways we ensure there is no child labour, including:

5.1 Monitoring practices against our plan by:

- Establishing key performance indicators to review whether objectives and targets have been met.



- Regular auditing to check relevant staff are following the correct procedure.
- Ensuring the required data is recorded as part of routine practices.
- Recording the number and detail of grievances, complaints or concerns raised by workers, jobseekers and staff related to child labour and if/how they have been remediated.
- Recording any suggestions or ideas raised and whether they have been actioned.

5.2 Reviewing whether/what improvements are needed based upon monitoring. For example:

- Whether the most up to date legal and other requirements have been identified.
- That the risk assessment reflects the current level of risk.
- That objectives and targets are sufficiently achievable as well as ambitious.
- That policy and procedure reflect practice.
- That assigned roles are appropriate and relevant staff have sufficient time and resources to carry out their roles effectively.
- Where issues or required improvement is identified an investigation is carried out to find the root cause.
- The root cause of grievances, issues or concerns are reviewed to identify whether they are isolated cases or reflect a need for improvement.
- Any suggestions or ideas raised by workers, jobseekers and staff are reviewed and considered as to whether they can be incorporated.
- The efficiency of the procedure and/or practice and whether or not waste can be eliminated is considered.

5.3 Improving our plan and practice based upon the review. For example by:


- Updating the plan to ensure it is fit for purpose.
- Developing or updating policies, procedures and other documents.
- Training or re-training to ensure relevant individuals have the required understanding and skills.
- Communicating or re-communicating messages to ensure relevant individuals have the required understanding.
- For staff, treating wilful breaches of the procedure in accordance with the Conduct & Capability /Disciplinary policy and procedure.
- For Recruitment Intermediaries (and sub-agents), sub-contracted Labour Providers or clients, treating breaches in accordance with the Labour Supply Chain Due Diligence policy and procedure.

6 ACCOUNTABILITY, DOCUMENT AND VERSION CONTROL

This document is effective from:	1 st January 2023
This document is approved by:	Robin Skailes, Managing Director
For questions or queries about this document, contact:	Robin Skailes



The following table details any updates, changes or developments made to this document:

Version Number	Detail	Date	Approved by
1	Version 1 original policy issued	January 2023	Robin Skailes Managing Director
2			

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