

Anti-Modern Day Slavery Policy 2022

What is Slavery?

The Modern Slavery Act (MSA) 2015 covers four activities:

Slavery	Exercising powers of ownership over a person
Servitude	The obligation to provide services is imposed by the use of coercion
Forced or compulsory labour	Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily
Human trafficking	Arranging or facilitating the travel of another person with a view to their exploitation

The policy covers all four activities

How is it relevant to us?

Modern slavery is a complex and multi-faceted crime and tackling it requires many organisations and individuals to play a part. At first glance individuals may think that the subject is irrelevant to them, but it's not. At a very basic level, preventing exploitation and human trafficking and protecting our workforce and reputation makes good business sense. The MSA Act 2015 recognises the important part business can and should play in tackling slavery and encourages them to do more. With this in mind, we need to pay particular close attention to our supply chain, particularly:

- Outsourced activities such as cleaning, waste management etc;
- Short term hire of low skilled labour.

Responsibilities

The company, managers and colleagues have a responsibility to ensure fellow workers are safeguarded, treated fairly and with dignity. Everyone must observe this policy and be aware that 'turning a blind eye' is unacceptable and not an option.

The Company

Will:

- Maintain clear policies and procedures preventing exploitation and human trafficking and protecting our workforce and reputation;
- Be clear with our recruitment policy;
- Examine our supply chains and be clear with key suppliers our expectations regarding the Act;
- Lead by example by making appropriate checks on all employees, recruitment agencies, suppliers etc to ensure we are confident who is working for us;

- Continue to have in place an open and transparent grievance process for all staff;
- Seek to raise awareness so that our colleagues know what we are doing to promote their welfare;
- Make it clear that we take our responsibilities to our employees and our clients seriously.

Managers

Will:

- Listen and be approachable to colleagues;
- Respond appropriately if they are told something that might indicate a colleague is in an exploitative situation;
- Remain alert to indicators of slavery (see identifying slavery);
- Raise the awareness and ensure all employees are provided with a copy of this policy and be aware of their responsibilities;
- Use their experience and professional judgement to gauge situations.

Colleagues

We all have responsibilities under this policy. Whatever your role or level of seniority, you must:

- Keep your eyes and ears open – If you suspect someone (a colleague or someone in our supply chain) us being controlled or forced by someone else to work or provide services, follow our reporting procedure (See Reporting Slavery);
- Follow our reporting procedure if a colleague tells you something you think might indicate they are or someone else is being exploited or ill-treated;
- Tell us if you think there is more we can do to prevent people from being exploited.

Our Procedures

Anti-Slavery Statement

We take our responsibilities to our employees, people working within our supply chain and our clients seriously and we update our policy annually.

Supply Chains

We tell all organisations that we do business with, that we are not prepared to accept any form of exploitation.

All relevant supplier contracts will contain an anti-slavery clause. This clause which is through all of our supply chain prohibits suppliers and their employees from engaging in slavery or human trafficking.

Identifying Slavery

There is no typical victim and some victims do not understand they have been exploited and are entitled to help and support. However, the following key signs could indicate that someone may be a slavery or trafficking victim:

- The person is not in possession of their own passport, identification or travel documents;
- The person is acting as though they are being instructed or coached by someone else;
- They allow others to speak for them when spoken to directly;
- They are dropped off and collected from work;
- The person is withdrawn, or they appear frightened;
- The person does not seem to be able to contact friends or family freely;
- The person has limited social interaction or contact with people outside their immediate environment.

This list is not exhaustive.

A person may display a number of the trafficking indicators set out above but they may not necessarily be a victim of slavery or trafficking. Often you will build up a picture of the person's circumstances which may indicate something is not quite right.

If anyone has a suspicion it should be raised to the HR Department who will follow reporting procedures.

Reporting Slavery

- Talking to someone about concerns may stop someone else from being exploited or abused.
- If you consider that someone may be in immediate danger, call 999
- If you do not think someone is in immediate danger but have concerns, discuss them with the HR Manager who will decide a course of action which may include contacting the Police or the Gangmasters Licensing Association (GLA).
- Not all victims may want to be helped and there may be instances where reporting a suspected trafficking case puts the potential victim at risk, so it is important that in the absence of immediate danger, concerns are discussed first with the HR Manager before taking any further action.

Training

All employees are made aware of this policy and their obligations to comply with it.

Monitoring

This policy will be reviewed at least annually and training will be provided for any changes that are made.