

Anti-Slavery Policy

Introduction and Scope

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.

This policy covers all four activities.

This policy does not form part of any contract of employment, and we may amend it at any time.

Principles

Modern slavery is a complex and multi-faceted crime, and preventing exploitation and human trafficking as well as protecting our workforce and reputation is of utmost importance to us.

The MSA 2015 recognises the important part businesses can and should play in tackling slavery and encourages them to do more.

With this in mind, we need to pay particularly close attention to:

- our supply chain;
- any outsourced activities, particularly to jurisdictions that may not have adequate safeguards;
- cleaning and catering suppliers; and
- corporate hospitality.

Responsibilities

We, our managers and colleagues have responsibilities to ensure our fellow workers are safeguarded, treated fairly and with dignity.

Everyone must observe this policy and be aware that turning a blind eye is unacceptable.

We will maintain clear policies and procedures preventing exploitation and human trafficking, and protecting our workforce and reputation by:

- maintaining clear and transparent recruitment processes;
- checking our supply chains;
- leading by example by making appropriate checks on all employees, recruitment agencies, suppliers etc. to ensure we know who is working for us;
- ensure we have in place an open and transparent grievance process for all staff; and
- seek to raise awareness so that our colleagues know what we are doing to promote their welfare.

This policy intends to demonstrate our commitment, setting out the steps we have taken to ensure slavery and human trafficking is not taking place in our supply chains and demonstrates that we take our responsibilities to our employees and our clients seriously.

Managers

Managers will:

- listen and be approachable to colleagues;
- respond appropriately if they are told something that might indicate a colleague, or any other person is in an exploitative situation;
- remain alert to indicators of slavery;
- raise the awareness of our colleagues by discussing issues and, if appropriate, providing training so that everyone can spot the signs of trafficking and exploitation and know what to do; and
- 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) is being controlled or forced by someone else to work or provide services, follow our reporting procedure;
- 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; and
- tell us if you think there is more we can do to prevent people from being exploited.

The Risks

The principle areas of risk we face, related to slavery and human trafficking, include:

- Supply chains.



- General recruitment.
- Recruitment through agencies.

We manage these risk areas through our procedures set out in this policy and elsewhere.

Our Procedures

Recruitment

We always ensure all employees have a written contract of employment and that they have not had to pay any direct or indirect fees to obtain work. In addition we will:

- always ensure employees are legally able to work in the UK;
- check the names and addresses of our employees (a number of people listing the same address may indicate high shared occupancy, often a factor for those being exploited);
- check that employees are being paid into their own bank account; and
- provide information to all new recruits on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.

If, through our recruitment process, we suspect someone is being exploited we will follow our reporting procedures.

Recruitment Using Agencies

We only use agreed specified reputable recruitment agencies. To ensure the potential for slavery and human trafficking is reduced as far as possible, we thoroughly check recruitment agencies before adding them to our list of approved agencies. This includes:

- conducting background checks, including GLAA licence, REC licence, and ALP licence;
- investigating reputation;
- ensuring the staff an agency provides have the appropriate paperwork, e.g. work visas;
- ensuring the agency provides assurances that the appropriate checks have been made on the person they are supplying; and
- keeping agents on the list under regular review.

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 (non-exhaustive list) are key signs that 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.

Remember, 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 you have a suspicion, report it.

Reporting Slavery

Talking to someone about your concerns may stop someone else from being exploited or abused.

If you think that someone is in immediate danger, dial 999.

Otherwise, you should discuss your concerns with your line manager who will decide a course of action and provide any further advice.

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 an immediate danger, you discuss your concerns first with your line manager before taking any further action.

Monitoring Our Procedures

We will review this policy regularly and, where applicable, will provide information and/or training on any changes we make.