



Anti-Slavery Policy

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Introduction

The Modern Slavery Act 2015 (MSA) consolidated existing offences into a single act and was designed to fight modern slavery, ensure perpetrators can receive suitably severe punishments for these appalling crimes and enhance support and protection for victims and received Royal Assent on the 26th March 2015.

The consolidated offences covered by the MSA are as follows;

- Domestic Servitude
- Sex Trafficking
- Forced Labour
- Bonded Labour
- Child Labour
- Forced Marriage

Defined Terms

The following categories are identified within the MSA and all offences under this act fit into the respective category;

- **Domestic Servitude** – Employees working in private homes are forced or coerced into serving and/or fraudulently convinced that they have no option to leave.
- **Sex Trafficking** – Woman, men or children that are forced into the commercial sex industry and held against their will by force, fraud or coercion.
- **Forced Labour** – Human beings are forced to work under the threat of violence and for no pay. These slaves are treated as property and exploited to create a product for commercial sale.
- **Bonded Labour** – Individuals that are compelled to work in order to repay debt and unable to leave until the debt is repaid. It is the most common form of enslavement in the world.
- **Child Labour** – Any enslavement – whether forced labour, domestic servitude, bonded labour or sex trafficking – of a child.
- **Forced Marriage** – Women and children who are forced to marry another without their consent or against their will.

Assessment of Risk

The prevalence of modern slavery within the scope of the company's operations and the associated supply chains are extremely low but this is not seen as a reason to be complacent in the company's commitment to aid in the eradication of all forms of modern slavery.

The Global Slavery Index has been referenced regarding the company's undertakings and all products utilised or supplied by the company, these products are primarily obtained from the European market which accounts for an estimated 2.7% of the global prevalence of modern slavery and of this percentage the majority of confirmed offences are under the consolidated heading of 'Sex Trafficking' where 80% of victims from the 2.7% of the global prevalence are female. Given these figures it is expected that the likelihood of modern slavery within the company's supply chain is extremely minimal.

The potential areas of risk for the company are offences under the MSA being committed as follows;

- Within the production of supplied plant/machinery
- Within the production of consumable products
- Within the production of supplied clothing or PPE
- Profits from MSA Breaches being utilised within the supply chain
- Forced or bonded labour affecting employees

Mitigation of Modern Slavery

Although the expected risk level of modern slavery within the company supply chain is expected to be extremely minimal the company will as far as reasonably practicable check that suppliers;

- Have a modern slavery and/or a corporate and social responsibility policy or procedure that adequately covers the requirements of the MSA and any other requirements for that supplier.
- Where this information is not available a statement from a senior manager about their approach to the eradication modern slavery will be required to be issued and reviewed.
- Where concerns about a company are raised they will be reported and pending investigation a decision on further use of the company made.

Concerns about a company can be raised either by talking to the Human Resources or Health & Safety Manager.

Recruitment

It is not only a responsibility to ensure that modern slavery does not exist in the supply chain but also to ensure that it is not occurring within the business through recruitment agencies or direct employees.

This can be monitored by following the information below;

- **Contracts of employment** - Check that all staff, including agency workers, have a written contract of employment and that they have not had to pay any direct or indirect fees to obtain work.
- **Pay** – Make sure staff are legally able to work in the UK. Do recruitment agencies provide assurance that the appropriate checks have been made on the person they are supplying?
- **Fear of authorities** – Is the person afraid of the authorities police, immigration, the tax office, etc.
- **Appearance** – Does the person look malnourished, unkempt, or appear withdrawn? Are they suffering physical injuries? Do they have few personal possessions and often wear the same clothes?
- **Transport** – Are a group of workers dropped off or picked up at unusual times of the day, are they all taken to the same property?
- **Legal documents** – Is the person in possession of their legal documents (passport, identification and their own bank account details) or are these being held by someone else? Victims will often be forced to use false or forged identity documents or take a long time to produce the originals.
- **Quotes & Fees** – Use statistics to assess quotations and fees from agencies offering or charging suspiciously low rates.
- **Statutory rights** – Make sure your workers know their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.
- **Shared Occupancy** - Check the names and addresses of those working for you. If you have a number of people listing the same address it may indicate high shared occupancy, often a factor for those being exploited.

Reporting Suspected Breaches

If you suspect a person is being abused under the MSA;

Call the 101 non-emergency number, or if the person is in immediate danger or is under 18 then call 999 immediately, once this has been done inform the Human Resource or Health & Safety Manager.

All discussions will be treated as confidential.

Protection of Whistle-blowers or persons affected by Modern Slavery

All persons classed as whistle-blowers or that have been affected by modern slavery will be protected as far as possible by the company, no negative outcomes will be taken against any persons fitting these criteria and where deemed necessary the following support can be given to persons;

- Counselling
- Time off of work
- Closed discussions with senior management
- Access to legal advice
- Any other supportive need that is identified as required

All protection and support offered by the company will be judged on an individual basis and tailored to suit each individual's needs.

