



**Modern Slavery Policy**

Version 1.0

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## 2. Version Control

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## 3. Background

The Modern Slavery Act 2015 requires all companies and organisations to comply with the Act. Large commercial organisations within certain criteria need to publish a Modern Slavery Statement for each fiscal year on their website. However, all companies and organisations need to inform their staff of the Act and ensure that, if there is a breach in the Supply Chain, the appropriate authorities are informed. As a company, we are committed to understanding and complying with the Modern Slavery Act.

## 4. Definitions

Modern Slavery is a term used to encapsulate both offences in the Modern Slavery Act: slavery, servitude and forced or compulsory labour; as well as human trafficking. The offences are set out in Sections 1 and 2 of the Act. In accordance with the 1926 Slavery Convention, Modern Slavery is the status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised. Since legal 'ownership' of a person is not possible, the key element of slavery is the offender behaving as if he/she did own the person, depriving that person of their freedom. Servitude is the obligation to provide services, imposed using coercion, including the obligation for a 'serf' to live on another person's property and the impossibility of that serf changing his or her condition.

### Definition of Forced or Compulsory Labour

Forced or compulsory labour is defined in international law by the ILO's Forced Labour Convention 29 and Protocol. It involves coercion – either direct threats of violence or more subtle forms of compulsion. The key elements are that work, or service is exacted from a person, under the menace of a penalty, and for which the person has not offered him/herself voluntarily.

## 5. Definition of Human Trafficking

An offence of human trafficking requires that a person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even when the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job, or may be a child who is influenced to travel by an adult. In addition, the exploitation of the potential victim does not need to have already taken place for an offence to have been committed - if the arranging or facilitating of the movement of the individual was with a view to using them for either sexual or non-sexual exploitation. Statistics show that the most common crime recorded for potential victims first exploited as a child (where this is known) was labour trafficking.

## 6. Modern Slavery

Modern slavery is a crime resulting in an abhorrent abuse of human rights. It is constituted in the Modern Slavery Act 2015 by the offences of 'slavery, servitude and forced or compulsory labour' and 'human trafficking'.

As a company, we are committed to acting with integrity and honesty, and we are committed to promoting ethical business practices and policies that protect workers from being abused and exploited in our own organisation and in our supply chains. Not just because we are compelled to do so by law, but because it is the right thing to do.

## 7. Our Aim

In our small way, our aim is to prevent modern slavery wherever practical and possible in our supply chains.

## 8. Due Diligence

We will not undertake any activities that breach this Act. We aim to constantly review and update our procedures to ensure we are checking our supply chains. We will undertake due diligence of all new suppliers, and we will train our staff and encourage them to come forward if they have any concerns that the Act is being breached in our supply chain. We will not hesitate to stop using any company/person within our supply chain and report any concerns to the appropriate government body. We will readily share with any customers/clients our processes/procedures/due diligence and a full list of our supply chain if asked to do so.

## 9. Reporting Guidance for Staff

In the first instance, bring your concerns to the attention of your Line Manager. If a specific case of modern slavery is identified here in the UK, it should be reported to the police immediately on 101. However, if potential victims are in immediate danger, the standard 999 emergency number should be used.

In the UK, mechanisms are in place to assist victims of slavery and human trafficking. If you identify a potential victim, they can be referred to the National Referral Mechanism to be formally identified as a victim of modern slavery and offered government-funded support.

You may wish to discuss any concerns with the Modern Slavery Helpline on 0800 0121 700 before raising the matter further. This will allow anyone who thinks they may have come across an instance of modern slavery, or indeed who may be a victim themselves, to call for more information and guidance on what to do next.

## 10. Responsible Person

The responsible person within our company is the Managing Director. However, we are all responsible and accountable. You must not 'turn a blind eye'; you must report to your Line Manager any concerns you may have with our supply chain.