

## **Modern Slavery Policy**

### **Definition**

Modern slavery is defined as the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation.

Modern slavery is an umbrella term for all forms of slavery, human trafficking and exploitation. It is a hidden crime with victims often unable to come forward due to fear or shame, or because they are unable to leave their situation. Consequently, reporting is partial and quantifying the number of victims is challenging.

### **Purpose**

The Modern Slavery Act 2015 is a provision that was published to protect those victims in relation to slavery, servitude and forced or compulsory labour and human trafficking.

We are committed to ensuring that we are aware of modern slavery and our employees are also aware. We must be aware when using any third parties to ensure they have policies in place which raise awareness on this matter.

Although this may not be commonly discussed publicly in the UK there are thousands of victims around the world who are being exploited illegally by others for personal or commercial gain.

According to an article published in September 2022 on the ILO – International Labour Organization in 2021 there are approximately 50 million people worldwide in modern slavery. Latest estimates show that forced labour and marriage have increased significantly.

Because of its hidden nature, producing an accurate measure of prevalence is difficult. Currently, there is no definitive source of data or suitable method available to accurately quantify the number of victims of modern slavery in the UK.

There are some warning signs which may indicate people being kept in servitude.

- Workplace being used for accommodation
- Workers are distrustful of local authority
- Workers look uneasy, unkempt or malnourished
- Signs of psychological trauma
- Untreated injuries
- Evidence of control over movement (being picked up and dropped off in groups)
- Signs of substance misuse
- Workers don't know work or home address

We are committed as a company to ensure our employees have awareness and understanding in the importance of modern slavery we ensure;

- We provide training to employees regularly
- All employees are familiar with this policy
- Encourage an open-door policy
- Calls are audited to provide further training where applicable

## Employee Responsibilities

- Recognising that anybody can be vulnerable
- Modern slavery comes in many different forms
- Ensuring you understand modern slavery and its purpose
- Take responsibility to ensure that all client data is recorded on their case
- If you suspect or think anything is unusual it should be raised, it is better to share than to ignore and assume it's nothing, you could save someone from being a victim from a small tip off
- Communicate with us if they require further training or refreshers before the next training session
- Ask questions if you suspect something isn't right
- If you are unsure how to proceed approach your line manager for advice

It is important that we identify that specific types of modern slavery may occur more commonly in the industry we work in such as.

**Debt Bondage** also known as debt slavery, bonded labour or peonage. Debt bondage is a form of forced labour and happens when a person is forced to work to pay off a debt. They are tricked into working for little or no pay, with no control over their debt. This is thought to be the most widespread form of slavery today.

Although the majority of our communications are via phone call, it is still important that we identify risk factors and characteristics and take action. We do offer face to face meetings at our office.

If you suspect or become aware of any situation which may be relate to a crime being committed under modern slavery you must report it immediately.

<https://www.nationalcrimeagency.gov.uk/what-we-do/crime-threats/modern-slavery-and-human-trafficking>

The main policy in the United Kingdom is the Modern Slavery Act 2015. The website is below;  
<https://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>