

# Tackling Modern Slavery & Hidden Labour Exploitation policy

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**This Policy is not intended to act as or replace existing operational procedures.**

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## Policy Statement

(Insert company name) has a zero-tolerance approach to Modern Slavery and commits to developing and adopting a proactive approach to prevent, and remediate the risks of modern slavery, forced and debt-bonded labour, human trafficking and hidden exploitation within our labour supply sites, and investigate all concerns raised to us of potential labour exploitation.

**Modern slavery** is a broad term used to encompass offences that involve one or more persons depriving another person(s) of their liberty, to exploit them for personal or commercial gain.

**Forced labour** is all work or service that is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily.

**Debt-bonded labour** is where a person's labour is demanded as a means of repayment for a loan or service. Indicators of this are landlords linked to employment opportunities.

**Human trafficking** is the recruitment and transportation of persons by threat, force, coercion or other abuse of power or vulnerability to achieve the consent of a person having control over another person for the purpose of exploitation.

**Hidden labour exploitation** is action up to and including modern slavery which involves the exploitation of workers and job applicants by internal or external individuals without the sanction or explicit knowledge of the employer or labour provider.

## Responsibilities

(Insert relevant department/ heads) have overall responsibility for this policy and for investigating instances of labour exploitation, reporting into, and working with the GLAA and enforcement authorities.

All employees working for (insert company name) have a duty to read through this policy, understand how their role fits in spotting potential victims of Modern Slavery and how they can help.

## Policy Commitments

(Insert company name) (If relevant) is a business partner for the Stronger Together initiative and has attended the advanced learnings course. We undergo continuous development reviews of our processes to meet the full commitments stated in the 'Good Practice Implementation Checklist'. We commit to identifying signs of Modern Slavery and tackling modern slavery risks, with a particular focus on labour exploitation as this is an immediate risk to our business model.

Debt bondage is high risk as a common sign for workers to either pay a fee upfront for expected services, which can sometimes be false promises that do not materialise, or for them to be targeted for inflated charges to pay for day-to-day things such as accommodation, transport or other related services they believe to be linked to their job placement with an employer. Unfortunately, these debts often accumulate and are impossible to ever pay back for the individuals.

Our operational leads are trained on what Modern slavery is, how it impacts our business and spotting common indicators within their workforce. Any concerns from frontline staff are reported to (Insert relevant team) directly and they fully investigate. We run checks through our central IT platform; (Insert name) to look for patterns in worker details submitted with their applications and during their employment with (Insert company name). These checks include multi-occupancy flags, shared personal details and how the workers found out about (Insert company name), to minimise any risk of exploitation through the workers' journey.

This policy will be reviewed annually, and records kept for updates.

## Our response plans

To protect and provide remedy for victims of modern slavery, we have created a 'Response Plan' which details the entire process from spotting a sign of labour exploitation, the investigation process and reporting, to remediation. These are supported with escalation plans for our major clients. We have a 'Remediation Policy' in place which details how (Insert company name) enable victims to receive the relevant support and information required following involvement in labour exploitation. (Insert company name) endeavour to help them in any way we can and aim to provide a seamless handover to the enforcement authorities to follow through.

We monitor our progress to prevent, respond to and remediate the risks of modern slavery. We have a tried and tested method of tackling labour exploitation and working in partnership with the authorities and encourage collaboration with wider parties to help join together, share best practise and preventative actions learnt from key learnings shared.

At (Insert company name) we communicate the steps that we have implemented to manage the risks of modern slavery to our board and stakeholders and work with our supply chain partners to help mitigate the risk of human trafficking taking place. We produce a 'Modern Slavery Statement' annually and show a continuing improvement process to strengthen our controls and measures for tackling hidden labour exploitation in (Insert company name). We endeavour to check with each applicant that they have not been charged any work-finding fees to ensure this does not occur and actively encourage and support workers to report any concerns through several means including independent support mechanisms to enable (Insert company name) to investigate and act accordingly to address and tackle any issues.

## Signature Page

Senior leadership team

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