**Anti-Slavery, Human Trafficking & Illegal Workers Policy – PRC-00042**

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

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

**Commitments**

We shall be a company that expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

* We have a zero-tolerance approach to modern slavery in our organisation and our supply chains.
* The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate, or fail to report any activity that might lead to, or suggest, a breach of this policy.
* We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.
  + Consistent with our risk-based approach we may require:

Employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our Code of Conduct

Suppliers engaging workers through a third party to obtain that third parties’ agreement to adhere to the Code

* + As part of our ongoing risk assessment and due diligence processes, we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our Code of Conduct.
  + If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships.
  + Maintain and updating polices in line with legislation and best practice.

**Compliance**

You must ensure that you read, understand, and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your manager or report it in accordance with our Public Interest Disclosure Policy as soon as possible.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally.

**Illegal Working Policy**

Under section 21 of the 2006 Act, **knowingly employing an illegal worker can lead to a prison sentence for up to 2 years & / or an unlimited fine if the case is dealt with by a Crown Court**

Employers, as well as any members of staff with delegated responsibility within the business for the recruitment and employment of individuals, must fully understand their responsibility to carry out right to work checks in the prescribed manner, and therefore ensure compliance with the law.

To comply with the prevention of illegal working regime, you should always conduct a right to work check before you employ a person to ensure they are legally allowed to do the work in question for you. If an individual’s right to work is time-limited at the point that you employ them, you should also carry out a [follow-up check](https://www.davidsonmorris.com/list-b-management-risks/) shortly before this right is due to come to an end.

There are four different ways to conduct right to work checks; by correctly conducting either type of check, this will provide you with a statutory excuse to avoid any civil liability:

* [Manual Right to Work checks:](https://www.davidsonmorris.com/right-to-work-checklist/) the employer meets the individual face to face and check a physical copy of their [acceptable documentation.](https://www.davidsonmorris.com/eligibility-to-work-in-the-uk/)
* [Employer Checking Service:](https://www.davidsonmorris.com/employer-checking-service/)a free online service from the Home Office for cases where the individual is unable to use online checks or provide acceptable documentation for manual checks.
* [Digital Right to Work checks:](https://www.davidsonmorris.com/digital-right-to-work-checks/) the employer uses Identity Document Validation Technology (IDVT) through the use of an IDSP for checks on British and Irish citizens that are beyond the scope of the Home Office online service.
* Online Right to Work checks: the employer uses the online checking service and [employee share codes](https://www.davidsonmorris.com/right-to-work-share-code-guide/) instead of conducting a manual check to verify permission to work where the individual has:
  + A biometric residence permit or
  + Biometric residence card or
  + [Pre-settled](http://www.davidsonmorris.com/pre-settled-status-uk/) or [settled status](http://www.davidsonmorris.com/settled-status-uk/) under the EU Settlement Scheme or
  + Frontier worker permit

**Right to Work checks on EU workers**

EU nationals who were already in the UK by 31 December 2020 are able to remain in the UK with lawful status, provided they have secured their status under the EU Settlement Scheme for [settled](http://www.davidsonmorris.com/settled-status-uk/) or [pre-settled](http://www.davidsonmorris.com/pre-settled-status-uk/) status, the deadline for which was 30 June 2021. This status can be proven using a [share code and conducing an online right to work check](https://www.davidsonmorris.com/share-code-settled-status/). EU nationals coming to the UK to work from 1 January 2021 must apply to the Home Office for a work visa, which must be evidenced within the right to work check.

**Communication and awareness of this policy**

Training on this policy, and on the risk our business faces from modern slavery and illegal workers in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

Our commitment to addressing the issue of modern slavery & illegal workers in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter

**Breaches of this policy**

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Signed Diagram

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Anne Ashman

Commercial & Operations Director

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