

# Anti-Slavery & Human Trafficking Policy



## **Purpose**

This policy sets out how the firm deals with our responsibilities to our employees, people working within our supply chain and our clients.

## **Scope**

This policy and procedural document applies to all permanent or temporary staff, including agency and locum support. Please note it does not apply to personal grievances, concerns about terms and conditions of employment or general complaints.

This does not form part of your Contract of Employment. We may amend it at any time and decide to follow a different procedure where we consider it appropriate.

## **Responsibilities**

The COLP has overall responsibility for this policy and procedural document.

The Heads of Department have operational responsibility for this policy and procedural document.

## **Related documents**

### **Affected teams / individuals**

Applies to all permanent and temporary staff, including agency and locum support.

### **Related legislation / regulations / standards**

Modern Slavery Act 2015



## 1. Anti-Slavery Statement

We make a clear annual statement that we take our responsibilities to our employees, people working within our supply chain and our clients seriously. We make this statement on our website. We thoroughly check supply chains to ensure the potential for slavery and human trafficking is significantly reduced. We tell the companies we do business with that we are not prepared to accept any form of exploitation. All our supplier contracts contain an anti-slavery clause. This clause, which flows down through all layers of our supply chain, prohibits suppliers and their employees from engaging in slavery or human trafficking. We ensure we can account for each step of our supply processes—we know who is providing goods and services to us and we have mechanisms and processes in place to check, including:

- supplier mapping
- risk assessing suppliers
- auditing suppliers

## 2. Recruitment – Using agencies

We only use agreed specified reputable recruitment agencies. To ensure the potential for slavery and human trafficking is reduced as far as possible, we thoroughly check recruitment agencies before adding them to our list of approved agencies. This includes:

- conducting background checks
- investigating reputation
- ensuring the employees it provides have the appropriate paperwork (eg work visas)
- ensuring the agency provides assurances that the appropriate checks have been made on the person they are supplying

We keep agents on the list under regular review.

## 3. General Recruitment

We always ensure all employees have a written contract of employment and that they have not had to pay any direct or indirect fees to obtain work.

We always ensure employees are legally able to work in the UK.

We check the names and addresses of our employees (a number of people listing the same address may indicate high shared occupancy, often a factor for those being exploited).

We provide information to all new recruits on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.

If, through our recruitment process, we suspect someone is being exploited, we will follow our reporting procedures (See Reporting Slavery).

## 4. Identifying Slavery

There is no typical victim and some victims do not understand they have been exploited and are entitled to help and support.

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However, the following key signs could indicate that someone may be a slavery or trafficking victim.

- The person is not in possession of their own passport, identification or travel documents.
- The person is acting as though they are being instructed or coached by someone else.
- They allow others to speak for them when spoken to directly.
- They are dropped off and collected from work.
- The person is withdrawn or they appear frightened.
- The person does not seem to be able to contact friends or family freely.
- The person has limited social interaction or contact with people outside their immediate environment.

This list is not exhaustive.

## **5. Compliance with this policy**

All staff are expected to read and understand their obligations under this policy.

Victimisation of a whistleblower within this Firm will not be accepted and we will take instances of victimisation seriously and will manage them appropriately.

## **6. Review of policy**

The COLP is responsible for the review and management of this policy. To verify it is in effective operation across the practice, this policy is reviewed at least annually by the COLP and suggested amendments discussed with the Heads of Department and amended as appropriate. This policy will also be reviewed in the event of a major change within the organisation, change to regulation or legislation or a breach of this policy.