

Anti-Slavery and Human Trafficking Policy

Department	Governance
Policy Owner	Director (Legal & Governance)
Approved Date	August 2024
Date for Review	August 2025
Approving Body	Flagship Group Board
Associated Legislation/Regulation	Modern Slavery Act 2015 RSH Governance and Financial Viability Standard
Equality Impact Assessment Date	29th July 2024
Version Number	2.2

1. Purpose

- 1.1 To raise awareness of human trafficking, forced labour, servitude and slavery (“modern slavery”)

2. What is modern slavery?

- 2.1 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 to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to make all reasonable efforts to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- 2.2 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.
- 2.3 We will ensure that modern slavery is considered in our procurement processes. We will actively look to trade with companies who share our views on modern slavery. We will publish our Modern Slavery Statement on our website.
- 2.4 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.
- 2.5 This policy does not form part of any employee's contract of employment, and we may amend it at any time.

3. Responsibility for the policy

- 3.1 The Director (Legal and Governance) has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 3.2 The Director (Procurement and Projects) has responsibility for implementing this policy in the Group’s procurement processes and monitoring its use and effectiveness.

- 3.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.
- 3.4 You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Director (Legal and Governance).

4. Compliance with the policy

- 4.1 You must ensure that you read, understand and comply with this policy.
- 4.2 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.
- 4.3 You must notify your manager, the Director (Procurement and Projects) or the Director (Legal and Governance) as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.
- 4.4 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.
- 4.5 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 Whistleblowing Policy as soon as possible.
- 4.6 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, the Director (Procurement and Projects) or the Director (Legal and Governance).
- 4.7 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 the Director (Legal and Governance) immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found on Bob or by requesting it from the HR Team.

5. Training Statement

- 5.1 Training on this policy is provided via the Virtual Academy Learning Management System. The training is rolled out to all new employees with refreshers every three years for existing staff.
- 5.2 Indicators to be aware of include, but are not limited to: excessive number of beds in a property with no appropriate explanation, any member of a household who appears to be frightened or intimidated, if there appears to be a clear leader in the household or if there any signs of coercion or control.
- 5.3 For further information and guidance on how to recognise the signs of modern slavery and human trafficking, please visit the link below:

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

6. Breaches of this policy

- 6.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 6.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

7. EIA Statement

- 7.1 An Equality Impact Assessment was undertaken for this policy on 29th July 2024 and all identified impacts have been mitigated.

8. Measuring Effectiveness

- 9.1 The effectiveness of this policy will be measured through:
- Monitoring of training uptake to ensure awareness
 - Monitoring of Whistleblowing Register for Modern Slavery reports and action taken

10. Review Period

- 10.1 This policy will be updated as required and reviewed formally each year by the Director (Legal and Governance) and the Director (Procurement and Projects). In addition, it will be approved annually by the Flagship Board.