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Anti-Slavery & Human Trafficking Policy

Revised

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Amendment Date	Amendment Details	Authorised By
October 2019	New Anti-Slavery and Human Trafficking Policy formulated	Mr. Nick Eccles/ RHL
November 2020	Date change throughout the policy. Review and maintenance of legislation.	Mr. Nick Eccles/ RHL
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Section Contents

- 1 [What is slavery?](#)
- 2 [Responsibilities](#)
 - 2.1 [Everyone must observe this policy](#)
 - 2.2 [NTP Access Limited Responsibilities](#)
 - 2.3 [Managers responsibilities](#)
 - 2.4 [NTP Access Limited colleagues](#)
- 3 [The Risks](#)
 - 3.1 [The principal areas of risk we face](#)
 - 3.2 [We manage these risk](#)
- 4 [Our procedures](#)
 - 4.1 [Anti-slavery statement](#)
 - 4.2 [Supply chains](#)
 - 4.3 [Recruitment](#)
 - 4.4 [If we suspect someone is being exploited](#)
- 5 [Identifying slavery](#)
 - 5.1 [There is no typical victim](#)
 - 5.2 [Key signs to indicate a slavery or trafficking victim](#)
 - 5.3 [Persons displaying indicators are not always a victim](#)
 - 5.4 [If you have a suspicion](#)
- 6 [Reporting slavery](#)
 - 6.1 [Talking so someone about your concerns](#)
 - 6.2 [If you think someone is in danger](#)
 - 6.3 [Other ways to discuss your concerns](#)
 - 6.4 [What to do if a victim does not want to be helped?](#)
- 7 [Training](#)
- 8 [Monitoring our procedures](#)

1 What is slavery?

- 1.1 Modern slavery is a complex and multi-faceted crime and tackling it requires all of us to play a part.
- 1.2 At a very basic level, of course preventing exploitation and human trafficking, and protecting our workforce and reputation makes good business sense.
- 1.3 The Modern Slavery Act 2015 covers four activities:

Slavery	Exercising powers of ownership over a person
Servitude	The obligation to provide services is imposed by the use of coercion
Forced or compulsory labour	Work or services are exacted from a person under the menace of any penalty and for which the person had not offered themselves voluntarily.
Human Trafficking	Arranging or facilitating the travel of another person with a view to their exploitation.

- 1.4 This policy covers all four activities.
- 1.5 The Modern Slavery Act 2015 recognises the important part organisations can and should play in tackling slavery. With this in mind, we need to pay particularly close attention to:
 - 1.5.1 Our supply chain;
 - 1.5.2 Any outsourced activities, particularly to jurisdictions that may not have adequate safeguards; and
 - 1.5.3 Cleaning and catering suppliers.

2 Responsibilities

NTP Access Limited, our managers and colleagues have responsibilities to ensure our fellow workers are safeguarded, treated fairly and with dignity.

- 2.1 Everyone must observe this policy and be aware that turning a blind eye is unacceptable.
- 2.2 NTP Access Limited Responsibilities are:
 - 2.2.1 Maintain clear policies and procedures preventing exploitation and human trafficking, and protecting our workforce and reputation.
 - 2.2.2 Be clear about our recruitment policy (see Recruitment paragraph 4.3 below).
 - 2.2.3 Check our supply chains (see Supply chains paragraph 4.2 below).
 - 2.2.4 Lead by example by making appropriate checks on all employees, recruitment agencies, suppliers, etc. to ensure we know who is working for us.
 - 2.2.5 Ensure we have in place an open and transparent grievance process for all staff.
 - 2.2.6 Seek to raise awareness so that our colleagues know what we are doing to promote their welfare.
 - 2.2.7 Make a clear statement that we take our responsibilities to our employees and our clients seriously.
- 2.3 Managers responsibilities:
 - 2.3.1 Listen and be approachable to colleagues
 - 2.3.2 Respond appropriately if they are told something that might indicate a colleague is in an exploitative situation;
 - 2.3.3 Remain alert to indicators of slavery (see Identifying slavery Section 5)
 - 2.3.4 Raise the awareness of our colleagues, by discussing issues and providing training, so that everyone can spot the signs of trafficking and exploitation and know what to do
 - 2.3.5 Use their experience and professional judgement to gauge situations

- 2.4 NTP Access Limited colleagues all have responsibilities under this policy. Whatever your role or level of seniority, you must:
 - 2.4.1 Keep your eyes and ears open—if you suspect someone (a colleague or someone in our supply chain) is being controlled or forced by someone else to work or provide services, follow our reporting procedure (see Reporting slavery Section 6 below)
 - 2.4.2 Follow our reporting procedure if a colleague tells you something you think might indicate they are or someone else is being exploited or ill-treated.
 - 2.4.3 Tell us if you think there is more we can do to prevent people from being exploited.

3 The Risks

- 3.1 The principal areas of risk we face, related to slavery and human trafficking, include:
 - 3.1.1 Supply chains.
 - 3.1.2 Recruitment through agencies.
 - 3.1.3 General recruitment.
- 3.2 We manage these risk areas through our procedures set out in this policy and elsewhere.

4 Our Procedures

- 4.1 Anti-slavery statement
 - 4.1.1 We make a clear annual statement that we take our responsibilities to our employees, people working within our supply chain and our clients seriously.
 - 4.1.2 We make this statement as part of our company reporting.
- 4.2 Supply chains
 - 4.2.1 We will check supply chains to ensure the potential for slavery and human trafficking is significantly reduced.
 - 4.2.2 We tell the companies we do business with that we are not prepared to accept any form of exploitation.
 - 4.2.3 All our standard supplier contracts will contain an anti-slavery clause. This clause prohibits suppliers and their employees from engaging in slavery or human trafficking.
- 4.3 Recruitment
 - 4.3.1 Using agencies
 - a. Our HR department and recruiting managers follow NTP Access Limited policy and only use agreed specified reputable recruitment agencies.
 - b. 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:
 - i. conducting background checks
 - ii. investigating reputation
 - iii. ensuring the persons it provides have the appropriate paperwork (e.g. work visas)
 - iv. ensuring the agency provides assurances that the appropriate checks have been made on the person they are supplying
 - c. We keep agents on the list under regular review, at least every 3 years.
 - 4.3.2 General recruitment
 - a. We always ensure all employees have a written contract of employment.
 - b. We always ensure employees are legally able to work in the UK.
 - c. 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.
- 4.4 If we suspect someone, through our recruitment process, is being exploited, the recruiting manager will follow our reporting procedures (See Reporting slavery Section 6 below).

5 Identifying slavery

- 5.1 There is no typical victim and some victims do not understand they have been exploited and are entitled to help and support.
- 5.2 However, the following key signs could indicate that someone may be a slavery or trafficking victim:
 - 5.2.1 The person is not in possession of their own passport, identification or travel documents.
 - 5.2.2 The person is acting as though they are being instructed or coached by someone else.
 - 5.2.3 They allow others to speak for them when spoken to directly.
 - 5.2.4 They are dropped off and collected from work.
 - 5.2.5 The person is withdrawn or they appear frightened.
 - 5.2.6 The person does not seem to be able to contact friends or family freely.
 - 5.2.7 The person has limited social interaction or contact with people outside their immediate environment. This list is not exhaustive.
- 5.3 Remember, a person may display a number of the trafficking indicators set out above but they may not necessarily be a victim of slavery or trafficking. Often you will build up a picture of the person's circumstances which may indicate something is not quite right.
- 5.4 If you have a suspicion, report it.

6 Reporting slavery

- 6.1 Talking to someone about your concerns may stop someone else from being exploited or abused.
- 6.2 If you think that someone is in immediate danger, dial 999.
- 6.3 Otherwise, you should discuss your concerns with your line manager who will decide a course of action and provide any further advice in accordance with NTP Access Limited Safeguarding Policy.
- 6.4 What to do if a victim does not want to be helped? Not all victims may want to be helped and there may be instances where reporting a suspected trafficking case puts the potential victim at risk, so it is important that in the absence of an immediate danger, you discuss your concerns first with your line manager before taking any further action.

7 Training

- 7.1 We provide specialist training to those staff members who are involved in managing recruitment.
- 7.2 More general awareness training will be provided to all staff.

8 Monitoring our procedures

- 8.1 We will review our Anti-slavery Policy regularly, at least annually. We will provide information and / or training on any changes we make.

On behalf of
NTP Access Limited



Mr. Nick Eccles
Director.

Date: 01/11/2023