



# MODERN SLAVERY POLICY

SCCU LIMITED

VERSION 1.0

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## Version Control

VERSION	REVIEWER NAME	DATE	NEXT REVIEW	COMMENTS
1.0	Policy Pros	Feb 2023	Feb 2024	First Policy

## Introduction

1. Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the “Act”). Modern slavery can occur in various forms, including servitude, forced or 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.
2. This policy is necessary due to the unfortunate fact that modern slavery is a vast, worldwide problem. The UK is estimated to have tens of thousands of individuals working in slavery or being exploited each year.
3. The consequences of modern slavery are often serious mental and physical health issues. For this reason, SCCU is morally and ethically committed to helping those affected by modern slavery and to combatting such practices as a whole organisation approach.
4. Despite not being required to produce a modern slavery statement, SCCU is committed to preventing slavery and human trafficking violations in its own operations and has produced this policy to state our position; zero-tolerance towards slavery and a requirement for our supply chain to comply with our values.

## Scope

5. This policy applies to all stakeholders of SCCU, including employees, self-employed contractors, agency workers, seconded workers, learners, suppliers, and business partners.

## Definitions

6. Public Health England describes Modern Slavery as follows:

*“Modern slavery is defined as the recruitment, movement, harbouring or receiving of children, women or men using force, coercion, abuse of vulnerability, deception, or other means for exploitation. It is a crime under the Modern Slavery Act 2015 and includes holding a person in a position of slavery, servitude forced or compulsory labour, or facilitating their travel to exploit them soon after.”*

## Roles and Responsibilities

7. All staff members are equally responsible for the prevention, detection, and reporting of modern slavery. As a staff member, you must ensure that:
  - a. You attend and are engaged in our training on modern slavery.
  - b. You follow the training guidance in this policy on detecting and reporting modern slavery.
  - c. You avoid being complicit in the promotion of modern slavery and poor labour practices by following our policy and procedure.
  - d. You report all suspected modern slavery violations to the Education Manager immediately.
8. The Education Manager is responsible for the following:
  - a. Supporting staff, learners, and all stakeholders in reporting suspected modern slavery and/or poor labour practices to the authorities.
  - b. Bringing to the attention of the CEO any business partner who is suspected to be complicit in the promotion of modern slavery and/or poor labour practices.
9. The Senior Management Team are responsible for the following:
  - a. Reviewing and updating this policy annually or as required.
  - b. Embedding this policy and its procedures into everyday practice.
  - c. Ensuring compliance amongst staff, suppliers, and/or partners.
  - d. Terminating business relationships with suppliers and partners who fail to meet our standards in relation to this policy.

## Policy

10. Modern slavery permeates every corner of our economy.
11. SCCU may encounter Modern Slavery through:
  - a. Our learners or their families being trafficked or enslaved individuals.
  - b. Trafficked or enslaved individuals unknowingly working for or on behalf of SCCU.

- d. Trafficked or enslaved individuals being provided by other contracted service providers such as building maintenance workers.

## Training

- 12. Training on this policy and procedure forms part of the induction process for all individuals who work for or on behalf of SCCU, with updates being provided as required.

## Poor Labour Practices

- 13. Whilst not meeting the definition of modern slavery, human rights breaches within our supply chain are considered by SCCU as unacceptable.
- 14. We are committed to ensuring that the following poor labour practices form no part of our business activities, whether through a supplier or business partner:
  - a. Long working hours over and above safe and legal limits.
  - b. A lack of or insufficient health and safety management.
  - c. Bullying and harassment which is not appropriately managed or seen as a cultural norm.
  - d. Staff being fearful of speaking out due to retaliation.
  - e. Failure to allow workers the right to take up trade union membership.
  - f. Failure to pay the legal minimum wage.

## Procedures

### Modern Slavery and our Learners

- 15. A victim of modern slavery may have very little contact with members of the public or individuals outside of their household, and therefore it is crucial that staff:
  - a. Look out for signs of modern slavery within the learner groups.
  - b. Take any disclosure made by a learner seriously; and
  - c. Act upon the concern or disclosure by following the guidance in Appendix A.

## Responsible Recruitment

16. SCCU has a robust recruitment procedure where all potential employees and sub-contractors are screened to ensure that:
  - a. They are eligible to work in the UK and have the correct documents to prove the right to both reside and work in the UK.
  - b. They are of legal age to work.
17. Employees and other staff are also (where appropriate):
  - a. Paid a fair wage that meets or exceeds the UK minimum wage (employees).
  - b. Paid directly and not paid to another individual on the individual's behalf (employees).
  - c. Are free to join a trade union (all).
  - d. Given a Contract of Employment or suitable contractual working agreement (all).
  - e. Provided with working conditions that are safe, comfortable, fair, and legal in line with UK health and safety laws (all).
  - f. Are mentored and supported in the workplace (all).
  - g. Able to raise wrongdoings and poor practice without fear of retaliation in an environment where we seek to continually improve (all).

## Responsible Suppliers and Partners

### Due Diligence

18. SCCU is committed to maintaining responsible partnerships with our suppliers and business partners and will not knowingly engage with organisations that operate using modern slavery and/or poor labour practices.
19. Following evaluation, we do not consider that we operate in a high-risk environment. However, as part of our efforts to monitor and reduce the risk of modern slavery and human trafficking occurring in our supply chains or business relationships, we have adopted the following due diligence procedures:
  - a. Evaluating the modern slavery and human trafficking risks of each new supplier or business partner.

- c. Obtaining supporting policies and/or official statements from the supplier or business partner on their anti-modern slavery practice and promotion of human rights.
- d. Obtaining references of good character.
- e. Conducting a search to potentially uncover proof of wrongdoing in relation to this policy.

## Sharing Our Values

20. We expect all our suppliers and business partners to:

- a. Ensure sound and legal labour practices within their organisation.
- b. Provide support for workers to ensure their health, safety, and well-being.
- c. Appropriately categorise and pay workers at least the minimum wage.
- d. Complete their own due diligence before procuring goods or services to ensure that they do not promote modern slavery or poor business practices.
- e. Not break any law in relation to modern slavery or poor business practice.

21. Our zero-tolerance approach to modern slavery must be communicated to all suppliers and business partners at the outset of our business relationship.

22. SCCU will not work or engage with any workforce supplier or business partner who fails to meet our tendering process or agree to our terms and conditions.

## Ongoing Monitoring and General Sanctions

23. SCCU, as an ethical business, will terminate any contract or agreement with any supplier or business partner who has been convicted of or is being investigated for:

- a. Modern Slavery violations including the use of child or forced labour.
- b. Corruption, including Bribery and Fraud.
- c. Terrorism.
- d. Human Rights Violations.
- e. Environmental Violations.



## Monitoring and Reviewing

24. This policy should be reviewed periodically to ensure that it remains compliant with current legislation, meets best practices, and is not discriminatory.
25. Any incidents where a report has been made regarding modern slavery or poor labour practices becoming apparent in our/a supplier or partner's organisation or supply chain will be reviewed, and action plans will be agreed upon to improve our policies and working practices. These may include but are not limited to:
  - a. Increased or revised staff training.
  - b. Increased staff support.
  - c. Terminations of contracts with partner organisations.
  - d. Terminations of contracts with suppliers.
  - e. Reports to the authorities.
26. Disciplinary action being taken against staff who fail to abide by this policy.
27. The version number on new policies is always 1.0 and should be increased by one whole number each time the policy is edited other than to make simple changes, where they may increase in increments of 0.1.

## Appendix A: Guidance and Training on Modern Slavery

### Spotting the Signs of Modern Slavery

The charity Anti-Slavery has identified the following as possible signs of an individual being in slavery.

Any individual or individuals who:

- Appear to be under the control of someone else and reluctant to interact with others.
- Do not have access to their own personal identification.
- Have wages paid to another individual on their behalf.
- Have limited English vocabulary.
- Have few personal belongings, wear the same clothes every day or wear unsuitable clothes.
- Live in squalid, overcrowded, or unsafe accommodation.
- May not be able to move around freely.
- Are reluctant to talk to strangers or the authorities.
- Appear frightened, withdrawn, or show signs of physical or psychological abuse.
- Are always dropped off and collected for work in the same way, especially at unusual times, i.e., early in the morning or late at night.
- Are forced to work long hours or multiple jobs.

Modern Slavery and Exploitation also include:

- Sexual abuse, including where children are forced into relationships with much older individuals or adults are forced into sexual slavery.
- Harvesting of organs from individuals against their will.
- Child labour, including County Lines (Mobile phone lines used by criminal gangs to organise illegal drugs to be moved and sold from one village, town, or city to another across the UK, with children most often used to move and sell the drugs).
- Child marriage (if the marriage is forced and the child cannot reasonably leave the marriage).

Trafficked or enslaved individuals may avoid eye contact, appear frightened or hesitant to talk to strangers and fear law enforcers for many reasons, such as not knowing who to trust or where to get help, fear of deportation, and fear of violence against them or their family.

The signs above may not always indicate modern slavery but must not be ignored, and advice from professionals should always be sought.

## Raising a Concern

Any staff member who suspects Modern Slavery, Human Trafficking, or Exploitation should:

1. NOT confront the individual, individuals, or organisation directly; and
2. Inform the Education Manager immediately; and
3. Go to a quiet, secure place and use the information below to report your concerns.

## Where to Report Concerns

If you are in the UK and suspect someone might be in slavery, you have several options:

- Call the Modern Slavery Helpline (Unseen) and fill out an online form at <https://www.modernslaveryhelpline.org/report>
- Contact Crimestoppers at **0800 555 111** or visit <https://crimestoppers-uk.org/keeping-safe/community-family/modern-slavery>
- Contact the Police on 999 if a crime is or has been committed, life is in danger, or children are at risk.

It is the responsibility of SCCU management to support individuals who raise a concern and take the appropriate action against any individual(s) and/or organisation(s) found to be involved in modern slavery.