

## **Modern Slavery**

**Name** Team Locum Ltd

### **Policy Statement**

Modern Slavery is a crime which results in an abhorrent abuse of human rights. The Modern Slavery Act 2015 referred to as the “Act” created offences of slavery, servitude and financial or compulsory labour

### **Definitions of Modern Slavery**

Slavery, in accordance with the 1926 Slavery Convention, is the status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised. Since legal ownership of a person is not possible, the key element of slavery is the behaviour on the part of the offender as if he or she did own the person, which deprives the victim of their freedom.

Servitude is the obligation to provide services that is imposed by the use of coercion and includes the obligation of a “Serf” to live on another person’s property and the impossibility of changing his or her condition.

### **Forced or Compulsory labour**

This is defined in international labour law by the International Labour Organisations (ILO) Forced Labour Convention 29 and Protocol. It involves coercion, either direct threats of violence or more subtle forms of compulsion. The key elements are that, work or service is exacted from any person under the menace of any penalty and for which the person has not offered him/herself voluntarily.

### **Human Trafficking**

An offence of human trafficking requires that a person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to travel. This reflects the fact that a victim may be deceived by the promise of a better life or job, or may be a child who is influenced to travel by an adult. In addition, the exploitation of potential victim does not need to have taken place for the offence to be committed. It means that the arranging or facilitating of the movement of the individual was with a view of exploiting them for sexual exploitation or non- sexual exploitation.

Policies often emphasise the need to protect and support victims of slavery and human trafficking. This may involve providing shelter, medical care, counselling, and legal assistance to victims.

Governments and NGOs often implement awareness campaigns to educate the public about the signs of human trafficking and how to report suspicious activities. Prevention efforts may also include training law enforcement, border control, and other relevant personnel.

### **Risk of Human Trafficking within Team Locum**

Healthcare is not often seen as a high-risk environment for human trafficking due to the regulatory bodies that monitor the workforce. Particularly relevant in industries where there is a high risk of exploitation, such as agriculture, manufacturing, and construction.

It is however important that as an agency Team Locum monitors how the candidate is being paid, what account the money is going into and make sure it matches the name of the candidate. It also is important that when they're doing interviews with the company they're alone and answering the questions by themselves so that it shows they're doing so by their own free will.

### **Due Diligence of Suppliers**

Diligence processes, often referred to as due diligence, are crucial in identifying, preventing, and mitigating the risk of these abuses. Here are key components of diligence processes in relation to slavery and human trafficking:

Regularly audit and assess suppliers and subcontractors to ensure compliance with anti-slavery and human trafficking policies.

Conduct a comprehensive risk assessment to identify areas in the business operations and supply chains where there may be a higher risk of slavery and human trafficking.

Integrate anti-slavery and human trafficking clauses into supplier contracts and codes of conduct.

Protect whistleblowers from retaliation and investigate reported incidents promptly.

### **Training on Slavery and Human Trafficking**

Provide training to suppliers and employees on the risks of slavery and human trafficking, as well as on the company's policies and procedures. This education can empower stakeholders to identify and report potential violations.

Making sure all workers receive understand and sign to adhere to the companies policy on Slavery and Human Trafficking.

### **Child Labour**

This is defined by the ILO as children under 12 years working in any economic activity, those aged 12-14 engaged in more than light work and all children engaged in the worst forms of child labour.

Key elements of effective child labour policies include:

1. Legal Framework:

Establishing and enforcing laws that set a minimum age for employment. Outlining the types of work that are prohibited for children.

2. Education:

Promoting and ensuring access to quality education for all children.

Implementing measures to encourage school attendance and reduce dropout rates.

3. Social Programs:

Developing social programs to support families in need, addressing the root causes of child labour such as poverty.

Providing financial assistance, vocational training, and other support to families to help them meet basic needs without relying on child labour.

#### 4. Monitoring and Enforcement:

Creating mechanisms for monitoring workplaces to identify and address instances of child labour.

Establishing penalties for employers who violate child labour laws.

#### 5. International Collaboration:

Collaborating with international organizations and other countries to address the global aspects of child labour.

Sharing best practices and coordinating efforts to eliminate child labour.

#### 6. Public Awareness:

Raising awareness about the importance of eliminating child labour and the consequences for children's development.

Engaging with communities, NGOs, and the private sector to foster a collective commitment to eradicating child labour.

Many organizations, including the International Labour Organization (ILO), work towards the global elimination of child labour and the promotion of decent work for all

## **Compliance Requirements of Supply Chains**

The transparency in supply chains provision within the Act seeks to address the role of businesses, across all sectors preventing Modern Slavery in their supply chains and organisations. The following guidance sets out how businesses can meet these requirements, as set out in the Act.

There is a requirement that any commercial organisation, in any sector, which supplies goods and services, and carries on a business, or part of a business, in the UK and is above a specified total turnover, must produce a slavery and human trafficking statement for each financial year of the organisation.

Regulations have set the total turnover threshold at £36Million

The Statement must set out what steps they have taken during the financial year to ensure Modern Slavery is not occurring in their supply chains and in their own organisations.

The Act requires businesses to be transparent about what is happening within its business, therefore if the business has taken no steps to ensure slavery and human trafficking is not taking place they must still publish a statement stating this to be the case.

Failure to comply with the production of a Modern Slavery statement for a particular financial year could mean an injunction through the High Court (or In Scotland, court proceedings for

specific performance of a statutory duty under Section 45 of the Court of Sessions Act 1998) requiring the organisation to comply. Failure to comply with the injunction is a contempt of a court order which is punishable by an unlimited fine. In practice, failure to comply with the provision will mean the organisation has not produced a statement or published it on their website in the relevant financial year.

### **Smaller Organisations**

Where there is no requirement to produce a statement, organisations are encouraged to voluntarily produce a slavery and human trafficking statement, especially where they are contracting with organisations above the threshold. We, as a small provider may be asked to provide such a statement to commissioners of services, suppliers etc on our approach to Modern Slavery and find it helpful to have such a statement, hence this policy.

All businesses are encouraged by the Act to be open and transparent about recruitment practices, policies and procedures in relation to Modern Slavery and to take steps that are consistent and proportionate with their sector, size and operational reach

### **Inhumane treatment in the workplace**

Inhumane treatment in the workplace refers to any form of mistreatment, abuse, or unethical behaviour that employees may experience while on the job. This can take various forms and can have serious consequences for the well-being of individuals and the overall work environment. Inhumane treatment can manifest in different ways, including:

**Bullying and Harassment:** Verbal, physical, or psychological abuse by colleagues or superiors. Harassment based on factors such as race, gender, sexual orientation, or other protected characteristics.

**Discrimination:** Unfair treatment based on attributes like age, gender, race, religion, disability, or other protected categories. Systematic discrimination in hiring, promotions, or other employment practices.

**Exploitative Working Conditions:** Imposing excessively long working hours without adequate compensation. Ignoring workplace safety regulations, leading to hazardous conditions for employees.

**Withholding Basic Needs:** Denying access to breaks, food, or bathroom facilities. Failing to provide reasonable accommodations for individuals with disabilities.

**Isolation and Exclusion:** Excluding individuals from workplace activities or decision-making processes. Creating a hostile work environment that isolates certain employees.

**Retaliation:** Punishing employees for reporting unethical behaviour, discrimination, or other workplace issues.

Taking adverse actions against whistleblowers.

Addressing inhumane treatment in the workplace requires a combination of legal protections, company policies, and a supportive organizational culture. Some key measures include:

**Anti-Harassment and Discrimination Policies:** Clearly defined policies outlining acceptable behaviour and consequences for violations. Regular training for employees and management on these policies.

**Reporting Mechanisms:** Establishing confidential channels for employees to report mistreatment without fear of retaliation. Ensuring prompt and thorough investigations of reported incidents.

**Workplace Culture:** Fostering a culture of respect, diversity, and inclusion. Encouraging open communication and addressing issues promptly.

**Legal Protections:** Compliance with local and national laws regarding workplace conditions, discrimination, and harassment. Providing support for employees seeking legal recourse for inhumane treatment.

**Employee Assistance Programs (EAPs):**

Offering support services, counselling, or resources for employees facing workplace challenges. Creating a safe space for employees to seek help and guidance.

Companies and organisations that prioritise a positive and respectful workplace culture tend to have higher employee morale, productivity, and retention. It's crucial for employers to take proactive steps to prevent and address inhumane treatment, creating an environment where employees feel valued and protected.

## **Reporting**

When staff believe there is a possibility of a Modern Slavery situation, they must in the first instance report it to their manager who will then take it forward by reporting it to the helpline 08000121700 or report it online on the Modern Slavery helpline website

<https://www.modernslaveryhelpline.org/report>

## **Related Policies**

Adult Safeguarding

Confidentiality

**Data Protection Legislative Framework (GDPR)**

Good Governance

Overseas Workers

Recruitment and Selection

Safeguarding Children in an Adult Setting

Whistleblowing

Young People and Employment

## **Guidance**

<https://www.gov.uk/government/collections/modern-slavery>

Transparency in supply chains etc – a practical guide

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/649906/Transparency\\_in\\_Supply\\_Chains\\_A\\_Practical\\_Guide\\_2017.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/649906/Transparency_in_Supply_Chains_A_Practical_Guide_2017.pdf)

## **Training**

As part of our Induction process staff are aware of the Modern Slavery Act and how to report any concerns. We also train our managers to ensure they understand their responsibilities and are carrying them out. Information and help can be accessed on the phone number and website above.

## **Guidance for Writing a Statement**

- keep it succinct but cover relevant points
- provide links to appropriate publications, documents and policies, including guidance
- use plain English, simple language makes it accessible to everyone

- where appropriate the statement should also be available in other languages or formats
- the statement must be approved and signed by a director, member or partner of the organisation
- the statement must be published on the organisation website, with a link in a prominent place on the Homepage

### **Information to include**

- the sectors the business operates in and is it seasonal
- organisational structure and group relationships
- the countries it sources its goods or services from, including high risk countries where modern forms of slavery are prevalent
- the business operating model
- relationships, if any, with suppliers and others including trade unions and other bodies representing workers
- relevant organisational policies
- due diligence processes

### **Examples of a Modern Slavery Statement from businesses over £36Million threshold**

<http://www.grantthornton.co.uk/about-us/corporate-responsibility/modern-slavery-statement/>

[www.tescopl.com/media/392433/modern\\_slavery\\_act.pdf](http://www.tescopl.com/media/392433/modern_slavery_act.pdf)

[www.somersetcare.co.uk/sites/default/files/website/modern-slavery-act.pdf](http://www.somersetcare.co.uk/sites/default/files/website/modern-slavery-act.pdf)

[www.osjct.co.uk/about-osjct/partner-organisations/modern-slavery-human-trafficking-policy/](http://www.osjct.co.uk/about-osjct/partner-organisations/modern-slavery-human-trafficking-policy/)

### **Small Businesses**

For small businesses such as ours, awareness is the key to ensuring that this policy reflects the standards and ethical considerations we apply to our supply chain.

We have in place

- due diligence checks to identify and assess potential risk areas such as agency staffing
- the monitoring of potential risks in our supply chains by checking our supplier's commitment to Modern Slavery prevention
- a robust recruitment and selection process to mitigate the risks of Modern Slavery entering our workforce