

# ANTI-SLAVERY & HUMAN TRAFFICKING POLICY

## **31/01/23 Policy Statement**

The PCS Group, confirms that 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, agents, contractors and suppliers and we actively promote and encourage compliance in relation to the Modern Slavery Act (2015), which by definition "Modern Slavery" refers to slavery, forced or compulsory labour, human trafficking, and some forms of child labour, to ensure that slavery and human trafficking is not taking place in our business or within our supply chains.

This policy sets out the aims and will clearly define the steps taken to minimise the risks to ensure that our supply chains are transparent, according to the "Transparency in Supply Chains" clause and we voluntarily produce this statement to show our approach to tackling modern slavery to provide a level of assurance to our business and customers.

We strictly prohibit the use of modern slavery and human trafficking in our operations and supply chain and are committed to implementing systems and controls aimed at ensuring this does not take place.

We also expect our suppliers to hold their own suppliers to the same high standards.

This policy is further supported by the following policies:

- Child Labour and Young Workers
- Safeguarding and Prevent

### **Definition Of Slavery And Servitude**

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/ she did own the person, which deprives the victim of their freedom.

Servitude is the obligation to provide services that are imposed using coercion and include the obligation for a 'serf' to live on another person's property and the impossibility of changing his or her condition.

### **Definition Of Forced Or Compulsory Labour**

Forced or compulsory labour is defined in international law by the ILO's 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.

### **Definition Of 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 the 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 the 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 to exploiting them for sexual exploitation or non-sexual exploitation.

## **Definition Of Child Labour**

Child labour is defined by international standards as children below 12 years working in any economic activities, those aged 12 - 14 engaged in more than light work, and all children engaged in the worst forms of child labour (ILO).

The term "child labour" is often defined as work that deprives children of their childhood, their potential, and their dignity, and that is harmful to physical and mental development. Whether or not particular forms of "work" can be called "child labour" depends on the child's age, the type and hours of work performed, the conditions under which it is performed, and the objectives pursued by individual countries. Children can be particularly vulnerable to exploitation, but child labour will not always constitute modern slavery. It will still be necessary to determine whether, based on the facts of the case, the children in question are being exploited in such a way as to constitute slavery, servitude and forced or compulsory labour or human trafficking. For example, it is possible for children to undertake some 'light work' which would not necessarily constitute modern slavery. 'Light work' is defined by article 7 of ILO Convention No. 138.

Children do have vulnerabilities which should be considered when determining whether modern slavery is taking place. The Modern Slavery Act 2015 specifically recognises that it is not necessary for a child to have been forced, threatened, or deceived into their situation for it to be defined as exploitation.

## **The Worst Forms Of Child Labour**

The worst forms of child labour are very likely to constitute modern slavery.

The worst forms of child labour are defined by article 3 of ILO Convention No. 182 as:

1. all forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom and forced or compulsory labour, including forced or compulsory recruitment of children for use in armed conflict;
2. the use, procuring or offering of a child for prostitution, for the production of pornography or for pornographic performances;
3. the use, procuring or offering of a child for illicit activities, in particular for the production and trafficking of drugs as defined in the relevant international treaties;
4. work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children.

## **Behaviour Constituting Modern Slavery**

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Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in many ways. There is a spectrum of abuse, and it is not always clear at what point, for example, poor working practices and lack of health and safety awareness seep into instances of human trafficking, slavery or forced labour in a work environment. However, businesses have a responsibility to ensure that workers are not being exploited, that they are safe and that relevant employment (include wage and work hour), health and safety and human rights laws and international standards are adhered to, including freedom of movement and communications.

There will be cases of exploitation that, whilst being poor labour conditions, nevertheless do not meet the threshold for modern slavery – for example, someone may choose to work for less than the national minimum wage, or in undesirable or unsafe conditions, perhaps for long work hours, without being forced or deceived. Such practices may not amount to modern slavery if the employee can leave freely and easily without threat to themselves or their family. Organisations do still nevertheless have a legal duty to drive out poor labour practices in their business, and moral duty to influence and incentivise continuous improvements in supply chains.

## **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff. All Directors have been briefed on the subject.

## **Our Aims And Performance Indicators**

As part of our aims and our contract with suppliers, we require that they confirm to us that they are taking effective steps to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

They have taken steps to eradicate modern slavery within their business  
They hold their own suppliers to account over modern slavery  
(For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)  
(For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations  
We may terminate the contract at any time should any instances of modern slavery come to light.

## **Our Policies**

We operate several internal policies to ensure that we are conducting business in an ethical and transparent manner, these include:

1. Anti-slavery Statement. This statement sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.

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3. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
4. Code of conduct. This code explains the way we behave as an organisation and how we expect our employees and suppliers to act.
5. Business Ethics & Anti Bribery Policy. We are committed to preventing bribery and maintaining a culture within the organisation in which bribery is never acceptable.
6. Social Responsibility Policy. We recognise that our social, economic, and environmental responsibilities are integral to our business, and we are committed to demonstrating these through our actions and within our company policies and procedures.
7. Violence at Work Prevention Policy. We maintain a zero-tolerance standard of violence in the workplace.
8. Safeguarding Children and Adults Policy. We are committed to the importance of Safeguarding and Promoting Children's welfare
9. Training Policy. Employees are properly trained in the skills they need to carry out their present jobs at the correct standard.
10. Equal Opportunity Policy. We are committed to actively opposing all forms of discrimination.
11. Health & Safety Policy. We have a clear commitment to the very highest standards in relation to Health, Safety, and the Environment
12. Employment Policy. The benefits of adopting good employment practices are numerous and well documented.

## **Responding To An Incident Of Modern Slavery**

If a specific case of modern slavery is identified in the UK, it should be reported to the police immediately on 101. If potential victims are in immediate danger the standard 999 emergency number should be used. There is also a Modern Slavery Helpline on 0800 0121 700. This will allow anyone who thinks they may have come across an instance of modern slavery, or indeed who may be a victim themselves, to call for more information and guidance on what to do next.

If modern slavery is identified or suspected abroad, then the response should be tailored to the local circumstances. In some cases, the most appropriate response will be to engage with local NGOs, industry bodies, trade unions or other support organisations to attempt to remedy the situation. In other cases, it will be more appropriate to contact local government and law enforcement bodies. Organisations must always consider which approach would produce the safest outcome for the potential victims but should always remember the economic influence and control that the organisation holds over those who may be committing these crimes.

Mechanisms are in place to assist victims of slavery and human trafficking. If you identify a potential victim, they can be referred to the National Referral Mechanism to be formally identified as a victim of modern slavery and offered Government-funded support. Referral for potential adult victims is by consent. Government-funded support is provided through a range of specialist providers across the UK.

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## England And Wales

The Salvation Army 0300 303 8151

## Scotland

Trafficking Awareness Raising Alliance (TARA) 0141 276 7724

Migrant Helpline 07837 937737 or 07789 791 110

## Northern Ireland

Migrant Help 013 0420 3977 or 07766 668 781 (for male potential victims of human trafficking)

Women's Aid 028 9024 9041 (for female potential victims of human trafficking)

## Responsibilities

All managers have a responsibility to maintain a workplace free of discrimination and personal harassment.

Managers are directly responsible for the conduct of their staff and the smooth running of their area of management.

The PCS Group expects all employees to comply with this policy and all employees to conduct themselves appropriately.

All employees are responsible for treating others with respect and reporting any harassment for investigation.

## DATES

This policy was last reviewed on 31<sup>st</sup> January 2023.

The next review will be on 1<sup>st</sup> February 2024.



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