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# Anti-Slavery & Human Trafficking Policy

Revised  
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Amendment Date	Amendment Details	Authorised By
July 2021	New Anti-Slavery and Human Trafficking Policy formulated	Mr. Rick Smith / RHL
Amended October 2021	Amended as requested and approved.	Mr. Rick Smith / RHL
Amended April 2022	Right to work in the UK (Preventing Illegal Working) Proof of right to work in the UK Reporting of illegal workers to the relevant authorities Documents to establish eligibility to work in the UK	Mr. Rick Smith / RHL
November 2022	Date changed through whole document Research legal amendments.	Mr. Rick Smith / RHL
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November 2024	Date changed through whole document Research legal amendments. New Address updated within the policy.	Mr. Rick Smith / RHL

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# 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:

<b>Slavery</b>	Exercising powers of ownership over a person
<b>Servitude</b>	The obligation to provide services is imposed by the use of coercion
<b>Forced or compulsory labour</b>	Work or services are exacted from a person under the menace of any penalty and for which the person had not offered themselves voluntarily.
<b>Human Trafficking</b>	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

STS (Southern Technical Services) Ltd, 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 STS (Southern Technical Services) Ltd 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 STS (Southern Technical Services) Ltd 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 STS (Southern Technical Services) Ltd 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.
  - 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 STS (Southern Technical Services) Ltd 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 Right to work in the UK (Preventing Illegal Working)

7.1 Introduction The prevention of illegal migrant working in the UK is governed by sections 15 to 25 of the Immigration, Asylum and Nationality Act 2006.

7.2 Proof Of Right To Work In The Uk The Home Office, via the UK Border Agency, have compiled a list of documents, which prove that someone has the RTW in the UK. Documents will fall into either List A or List B and these are attached as appendices.

An employee will need to provide;

One document from List A, these documents show an on-going RTW in the UK.

If they cannot produce a document from List A then relevant document(s) from List B must be produced.

These documents show a RTW in the UK for up to twelve months.

These must be original copies, photocopies; scanned documents and faxes for example are not acceptable.

Proof of RTW in the UK must be provided when application is made in respect of new applicants. In respect of renewal applicants proof should be provided on application also, but if proof cannot be

provided at that time the Council will allow application to be made, but no licence will be granted until proof has been provided.

A copy of the relevant page(s) of the documents provided will be retained in a format which cannot subsequently be altered, for example a photocopy or a scanned document. In the case of a passport or other travel document, the following parts must be photocopied or scanned:-

The document's front cover and any page containing the holder's personal details. In particular any page will be copied that provides details of nationality, his or her photograph, date of birth, signature date of expiry or biometric details, **and**

Any page containing UK Government endorsements indicating that the holder has an entitlement to be in the UK and is entitled to undertake the work in question.

Other documents will be copied in their entirety. Any documents will be kept securely for the duration of the licence and for a further two years after the expiry of the last licence if renewal is not sought. This is in line with legislation which requires employers to retain copies of documents relating to individuals they have employed.

If further verification is required this will be specified in a letter detailing the exact requirements.

**7.3 The Fair Way To Check** It is illegal to discriminate on grounds of race, colour, ethnic or national origin, or nationality. No presumptions about a person's RTW in the UK will be made based on a person's background, appearance or accent. Each applicant will be required to comply with the RTW Policy and provide the necessary documentation.

**7.4 Reporting Of Illegal Workers To The Relevant Authorities** If the Company has any concerns that an employee has been working in the UK illegally then this information will be reported to the Home Office, Border and Immigration Agency and UK Border Agency.

**Need Further Information?**

• Further information about working in the UK, legislation and advice to employers can be found on the Home Office website;  
<http://www.ukba.homeoffice.gov.uk/sitecontent/documents/employersandsponsors/pr eventingillegalworking>

**7.5 Documents To Establish Eligibility To Work In The Uk**

If the applicant can produce a satisfactory document from List A, eligibility to work in the UK will have been established and will not need to be checked again. If an application is made after a licence has expired then proof of a person's RTW in the UK will be required again.

**LIST A:**

1. A current valid passport showing that the holder is a British citizen or a citizen of the United Kingdom and Colonies and contains the words 'the holder has the right of abode in the United Kingdom.'
2. A passport or national identity card showing that the holder is a national of a European Economic Area (EEA) country or Switzerland.
3. A residence permit or registration document certifying or indicating permanent residence issued by the Home Office or the UK Border Agency to the national of an EEA. For nationals of EEA countries, this document consists of a blue permit carrying a photograph and personal details of the holder. Swiss nationals receive a similar document in the form of a pink residence permit.
4. A permanent residence card issued by the Home Office or the UK Border agency to the family member of a national of an EEA country or Switzerland. When nationals from countries and Switzerland. When nationals from EEA or Switzerland reside in the UK their immediate family members from outside the UK, may gain the same rights to enter or remain here and work in the freely. However, the EEA national in question must be lawfully residing here in the UK for their family member to have and maintain these rights.
5. A Biometric Immigration Document issued by the UK Border Agency to the holder, which indicates that the person named in it is allowed to stay indefinitely in the UK or has no time limit on their stay in the UK. Further information will be made available by the UK Border Agency when the Biometric Immigration Document is due to be issued.

6. A passport or other travel document endorsed to show that the holder is exempt from immigration control, is allowed to stay indefinitely in the UK, has the right of abode in the UK or has not time limit on their stay in the UK.
7. An immigration Status Document issued by the Home Office, Border and Immigration Agency or UK Border Agency to the holder with an endorsement indicating that the person named in it is allowed to stay indefinitely in the United Kingdom or has no time limit on their stay in the United Kingdom, when produced in combination with an official document giving the person's permanent National Insurance Number and their name issued by a Government agency or previous employer.
8. A full birth certificate issued in the UK, Channel Island, the Isle of Man or Ireland which includes the name(s) of at least one of the holders parents, when produced in combination with an official document giving the persons permanent National Insurance Number and their name issued by a Government agency or previous employer.
9. A full adoption certificate issued in the UK, Channel Island, the Isle of Man or Ireland which includes the name(s) of at least one of the holders adoptive parents when produced in combination with an official document giving the persons permanent National Insurance Number and their name issued by a Government agency or previous employer.
10. A certificate of registration or naturalisation as a British citizen, when produced in combination with an official document giving the persons permanent National Insurance Number and their name issued by a Government agency or a previous employer.
11. A letter issued by the Home Office, Border and Immigration Agency or UK Border Agency to the holder which indicates that the person named in it is allowed to stay indefinitely in the United Kingdom when produced in combination with an office document giving the persons permanent National Insurance Number and their name issued by a Government agency or a previous employer.

**If an applicant produces any document from List B then the document must be re-verified, at least every 12 months, to produce evidence of the eligibility to work in the UK.**

**LIST B:**

1. A passport or other travel document endorsed to show that the holder is allowed to stay in the United Kingdom and is allowed to do the type of work in question, provided that it does not require the issue of a work permit.
2. A Biometric Immigration Document, issued by the UK Border Agency to the holder which indicates that the person named in it can stay in the United Kingdom and is allowed to do the work in question.
3. A work permit or other approval to take employment issued by the Home Office, Border and Immigration Agency or the UK Border Agency, when produced in combination with either a passport or another travel document endorsed to show that the holder is allowed to stay in the United Kingdom and is allowed to do the work in question, or a letter issued by the Home Office, Border and Immigration Agency or the UK Border Agency to the holder, or the employer or prospective employer confirming the same.
4. A certificate of application issued by the Home Office, Border and Immigration Agency or the UK Border Agency to or for a family member of a national of an EEA country or Switzerland, stating that the holder is permitted to take employment, which is less than 6 months old, when produced in combination with evidence of verification by the UK Border Agency Employer Checking Service.
5. A residence card or document issued by the Home Office, Border and Immigration Agency or the UK Border Agency to a family member of a national of an EEA country or Switzerland.
6. An Application Registration Card (ARC) issued by the Home Office, Border and Immigration Agency or the UK Border Agency stating that the holder is permitted to take employment, when produced in combination with evidence of verification by the UK Border Agency Employer Checking Service.
7. An Immigration Status Document issued by the Home Office, Border and Immigration Agency or the UK Border Agency to the holder with an endorsement indicating that the person named in it can stay in the United Kingdom, and is allowed to do the work in question, when produced in combination with an official document giving the person's permanent National Insurance Number and their name issued by a Government agency or previous employer (e.g. P45, P60, National Insurance Card).
8. A letter issued by the Home Office or the UK Border Agency to the holder or the employer or prospective employer, which indicates that the person named in it can stay in the United Kingdom and is allowed to do the

work in question, when produced in combination with an official document giving the person's permanent National Insurance Number and their name issued by a Government agency or previous employer (e.g. P45, P60, National Insurance Card).

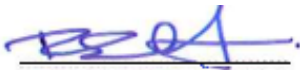
## 8 Training

- 8.1 General awareness training will be provided to all staff.

## 9 Monitoring our procedures

- 9.1 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  
STS (Southern Technical Services) Ltd



**Mr. Rick Smith**  
Director.

Date: 18<sup>th</sup> November 2024