



Modern Slavery Prevention Policy

Date of Implementation:
March 2023 (reviewed annually)
Date of Next review:
March 2026

This policy is due for review by the date shown above, after which it may become invalid. Policy users should ensure that they are consulting the valid version of the document.

Purpose of this Policy:

Slavery, child labour and human trafficking are serious crimes and a violation of fundamental human rights. There are various forms of this 'Modern Slavery' which deprives victims of their liberty and usually involves financial exploitation. At SWALLOW we conduct our business fairly, ethically and with respect to fundamental human rights. We are fully committed to the prevention of all forms of slavery, forced labour or servitude, child labour and human-trafficking, both in our business and in our supply chains. We will not tolerate it.

Failure to comply with this policy may result in disciplinary action, including dismissal, or termination of the contract between you and SWALLOW. It could also involve other legal steps being taken against you.

Scope:

This policy applies to all persons working for SWALLOW or on its behalf in any capacity.

Preventing slavery and human-trafficking:

SWALLOW makes appropriate checks on all employees, we provide every employee with a written contract of employment. We pay every employee in accordance with the law and comply with our legal obligations to ensure the health and safety of all of our employees and workers;

If you are an Employee of SWALLOW:

You must immediately report any suspicions of Modern Slavery or human-trafficking noticed. Our safeguarding officers will investigate and report the concerns accordingly. Staff will not suffer any detrimental treatment as a result of reporting any genuine concerns, raised in good faith, under this policy. This applies, even if after investigation, they are found to be mistaken. If you believe that you have suffered any such treatment, you should immediately refer to our Grievance and Whistleblowing Policies.

All staff are required to avoid any activity that might lead to, or suggest, a breach of this policy. Any employee who breaches this policy will face disciplinary action, which could result in summary dismissal for gross misconduct.

Signs to spot potential victims include:

- is the person in possession of their legal documents (passport identification and their own bank account details) or are these being held by someone else?
Victims will often be forced to use false or forged identity documents.
- do they appear under the control or influence of others and rarely interact with colleagues?
- are there a group of colleagues who have their wages paid into the same bank account? Are they having wages taken off them for accommodation, food or to repay supposed debt?
- is the person afraid of the authorities (police, immigration, tax office)?
- are there a number of people who are listed as living at the same address? This may indicate shared occupancy, often a factor for those being exploited.
- do they appear to be moving location frequently? This may indicate that they are under another's control.
- do they give a vague and inconsistent information about their medical history or about how they sustained an injury?

How to raise a concern

Staff are encouraged to raise concerns about any issue or suspicion of modern slavery at the earliest possible stage. If you believe or suspect a breach of this policy has occurred or that it may occur, you must report it to your line manager or report it by following the procedure set out in our Whistleblowing Policy as soon as possible.

If you are unsure whether a suspicion indicates modern slavery, or if you have any other queries, these should be raised with your line manager in the first instance.

In all cases, trust and act on your instinct that something is not quite right. It is usually a combination of triggers, an inconsistent story and a pattern of symptoms that may cause you to suspect modern slavery.

If you think that someone you work with at SWALLOW may be a victim of modern slavery, in addition to the above, you can call the modern slavery helpline on 0800 0121 700 and talk through your concerns or visit www.modernslavery.co.uk which provides more information on the types of slavery, the signs to spot and the appropriate referral processes for victims.