

ashfords

Anti-Slavery Policy



# ANTI-SLAVERY POLICY

## INTRODUCTION

Modern slavery is a crime resulting in despicable abuse of human rights. The Modern Slavery Act (MSA) 2015 came into force as from March 2015 and consolidates slavery and trafficking offenses. It covers four activities:

- Slavery;
- Servitude;
- Forced or compulsory labour;
- Human trafficking.

It ensures that offences are subject to the toughest asset recovery regime under the Proceeds of Crime Act 2002. The National Crime Agency, the police and other law enforcement agencies have the powers to bring to justice those engaged in human trafficking and slavery. Modern slavery is a complex and multi-faceted crime and tackling it requires all partners and staff of Ashfords LLP ("the Firm") to play a part. Protecting our workforce and reputation is vital. The MSA 2015 highlights the important need for businesses, and therefore the Firm, to play a part in tackling slavery.

The Transparency in Supply Chains Clause which came into force October 2015 requires organisations with a turnover of £36m or more to report on processes and due diligence taken to ensure that their supply chains are slavery free, and to produce and publish a slavery and human trafficking statement each financial year. From 1 May 2016, the Firm's increasing turnover triggered an annual statement which can be found on our website.

## RISK

The principal areas of risk we face, related to slavery and human trafficking, include, but are not limited to the following Business Partners:

- Supply chains;
- Outsourced activities;
- Cleaning and catering suppliers;
- Corporate hospitality;
- Recruitment through agencies;
- General recruitment.

The Firm will manage these risks through our procedures set out in this policy.

## RESPONSIBILITIES

The Firm, all employees and members have a responsibility to ensure all colleagues and Business Partners are safeguarded, treated fairly and with dignity. This policy must be observed and any serious concerns which are raised will be dealt with as appropriate and may trigger the Firm's disciplinary procedures.

The Firm will:

- maintain clear policies and procedures preventing exploitation and human trafficking, protecting our colleagues, Business Partners and our reputation;
- be clear about our recruitment policy (see Recruitment);
- check our supply chains (see Supply chains);
- make appropriate checks on all employees, recruitment agencies, suppliers, etc.;
- have in place an open and transparent grievance process for all staff.

Supervisors and Line-Managers will:

- listen and be approachable to colleagues;
- respond appropriately if they are told something that might indicate a colleague is in an exploitative situation;
- remain alert to indicators of slavery;
- raise awareness by discussing issues and providing training;
- use their experience and professional judgement to gauge situations.

Colleagues must:

- follow the reporting procedure (see Reporting) if there is any suspicion of a colleague or someone in our supply chain being controlled or forced by someone else to work or provide services;
- follow the reporting procedure if a colleague tells them something that may indicate they are or someone else is being exploited or ill-treated.

## ANTI-SLAVERY STATEMENT

The Firm will make a clear annual statement which will show a summary of the steps we have taken during the financial year to ensure that slavery and human trafficking is not taking place in any part of the business or our supply chains. It will be published on our website at the end of each financial year.

We are expected to build on our statement each year and therefore show that improvements can be made. The statement will also show:

- the organisation structure, our business and supply chains;
- our policy in relation to slavery and human trafficking;
- the due diligence processes in relation to slavery and human trafficking;

- the parts of the business and supply chains where there is a risk of slavery and human trafficking, and what steps are being taken to assess and manage that risk;
- training available to partners and colleagues about slavery and human trafficking.

The statement will be approved by the members and signed by a designated member. The Firm will publish the statement on our website.

## **RISK ASSESSMENT**

- Identifying suppliers by total spend/goods or services/location;
- Employment;
- Sector;
- Relationship;
- Supply chains (a supplier is any individual or company which provides goods or services);
- We (the Firm) will thoroughly check supply chains to ensure the potential for slavery and human trafficking is significantly reduced (see supplier questionnaire);
- We will inform companies that we do business with that we are not prepared to accept any form of exploitation;
- Our supplier contracts will contain an anti-slavery clause which prohibits suppliers and their employees from engaging in slavery or human trafficking;
- Each step of the supply process will be accounted for. We will know who is providing goods and services to us, and we will have mechanisms and processes in place to check, including;
- Risk assessing suppliers;
- Auditing suppliers.

## **RECRUITMENT USING AGENCIES**

HR will follow the Firm's policy and only use agreed specified reputable recruitment agencies;

Recruitment agencies will be checked to reduce the potential for slavery and human trafficking, and placed on our list of approved agencies. This will be achieved by:

- Conducting background checks;
- Investigating reputation;
- Ensuring supplied staff have the appropriate paperwork;
- Ensuring assurances are provided by the agency that the appropriate checks have been made on the supplied person(s);
- The list of approved recruitment agencies will be reviewed at least every three years.

## GENERAL RECRUITMENT

- All staff will have a written contract of employment and will not be asked to pay any direct or indirect fees to obtain work;
- The Firm will ensure staff are legally able to work in the UK;
- Names and addresses of staff will be checked to identify a high number sharing occupancy (often a factor for those being exploited);
- Information will be provided to all new recruits on their statutory rights including sick pay, holiday pay, and any other benefits they be entitled to;
- HR will follow the Firm's reporting procedure should they suspect someone is being exploited.

## IDENTIFYING SLAVERY

There is no typical victim and some victims do not understand they have been exploited and are entitled to help and support. The following list of indicators, which is not exhaustive, could trigger suspicions that someone may be a slavery or trafficking victim. The person:

- may not be in possession of their own passport, identification or travel documents;
- will allow others to speak for them when spoken to directly;
- will be withdrawn or appear frightened;
- does not seem to be able to contact friends or family freely;
- has limited social interaction or contact with people outside their immediate environment.

A person may display a number of the indicators as set out above but they may not necessarily be a victim of slavery or trafficking.

## REPORTING

If you have any concerns, you should raise them with the Firm's Money Laundering Reporting Officer (MLRO), David Pomeroy ext. 8055 or [d.pomeroy@ashfords.co.uk](mailto:d.pomeroy@ashfords.co.uk) who will decide a course of action and provide any further advice. If you believe the victim may be in immediate danger, please dial 999. Please be aware though, that 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.

It is therefore important that in the absence of an immediate danger, you should discuss your concerns first with the MLRO before taking any further action.

## TRAINING

The Firm provides general awareness training by means of a PowerPoint presentation. This is accessible to all our colleagues via the P&FR Compliance Hub. We also provide specialist training to those departments who are specifically involved in managing recruitment and our supply chains, i.e. HR, Facilities, BD, IT, Library & Information Services and Finance. The specialist training is mandatory and is expected to be

completed on an annual basis or as the Firm sees appropriate. This specialist training is also accessible to all our colleagues via the P&FR Compliance Hub.

## **MONITORING**

The Firm will monitor our procedures and review the Anti-Slavery policy regularly and at least annually on publication of the Firm's annual statement. We will provide information and (if necessary) training on any changes which are made.