

**MODERN SLAVERY  
(ANTI SLAVERY AND  
HUMAN  
TRAFFICKING)**

**CONTROLLED DOCUMENT**

**Written By: Jason Waplington**

**Checked By: Richard Chitty**

**Approved By: Jason Waplington**

**Date:**

**For**

**PREPARED BY:**

**RICHARD SHEEHAN  
PERSONNEL MANAGER  
FRANKHAM CONSULTANCY GROUP  
IRENE HOUSE  
FIVE ARCHES BUSINESS ESTATE  
MAIDSTONE ROAD  
SIDCUP  
KENT  
DA14 5AE**

**TELEPHONE: 020 8309 7777**

**FAX: 020 8309 7890**

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**FRANKHAM  
CONSULTANCY  
GROUP LTD**

## **1.0 PURPOSE**

- 1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

## **2.0 POLICY**

- 2.1 Frankham's has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- 2.2 Frankham's is also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with any disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

## **3.0 SCOPE / TO WHOM THIS POLICY APPLIES**

- 3.1 This policy applies to all persons working for Frankham's or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.
- 3.2 This policy does not form part of any employee's contract of employment and the Company may amend it at any time.

## **4.0 RELATED POLICIES AND PROCEDURES**

- 4.1 This Modern Slavery (Anti-Slavery and Human Trafficking) Policy interacts with other workplace policies and procedures. You are encouraged to familiarise yourself with these policies. If you have any queries about this policy, please contact the Group HR Manager.

## **5.0 RESPONSIBILITY FOR POLICY**

- 5.1 Frankham SMT have overall responsibility for ensuring this policy with senior management; and managers having day to day responsibility to ensure compliance with our legal and ethical obligation The Group Commercial Director has primary and day-to-day responsibility for implementing this policy,

monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

## **6.0 COMPLIANCE WITH THIS POLICY**

- 6.1 You must ensure that you read, understand and comply with this policy. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy. You must notify your manager OR the Group Commercial Director as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your manager or the Group Commercial Director. If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or the Group Commercial Director. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. Frankham is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Group HR manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using the Grievance Procedure.
- 6.2 The Group will assess the situation in line and the SMT will direct and authorise the taking of the appropriate steps in accordance with the latest UK Government Home Office statutory guidance being: Modern Slavery: Statutory Guidance for England and Wales (under s49 of the Modern Slavery Act 2015) and Non-Statutory Guidance for Scotland and Northern Ireland.
- 6.3 This may include referring potential victims of modern slavery into the National Referral Mechanism

## **7.0 COMMUNICATION AND AWARENESS OF THIS POLICY**

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## **8.0 BREACHES OF THIS POLICY**

8.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. Frankham may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

## **9.0 GENERAL INDICATORS OF MODERN SLAVERY**

9.1 In order to identify a potential victim of modern slavery, frontline staff who might encounter a potential victim should be familiar with the indicators set out in this section. Not all indicators of modern slavery will be present in all situations. Victims of Modern Slavery can be found in a variety of situations.

9.2 In practice it is not easy to identify a potential victim – there are many different physical and psychological elements to be considered as detailed below. For a variety of reasons, potential victims of modern slavery may also:

- a) be reluctant to come forward with information;
- b) not recognise themselves as having been trafficked or enslaved;
- c) tell their stories with obvious errors and/or omissions.

9.3 The following list outlines General Indicators of modern slavery. Victims may:

- Believe that they must work against their will
- Be unable to leave their work environment or home environment
- Show signs that their movements are being controlled
- Feel that they cannot leave
- Show fear or anxiety
- Be subjected to violence or threats of violence against themselves or against their family members and loved ones
- Suffer injuries that appear to be the result of an assault
- Suffer injuries or impairments typical of certain jobs or control measures
- Suffer injuries that appear to be the result of the application of control measures
- Have false identity or travel documents (or none at all)
- Be found in or connected to a type of location likely to be used for exploiting people

- Be unfamiliar with the local language
- Not know their home or work address
- Allow others to speak for them when addressed directly
- Act as if they were instructed by someone else
- Be forced, threatened or deceived into working in poor conditions
- Be disciplined through punishment
- Be unable to negotiate working conditions
- Receive little or no payment
- Be distrustful of the authorities
- Be threatened with being handed over to the authorities
- Be afraid of revealing their immigration status
- Not be in possession of their passports or other travel or identity documents, as those documents are being held by someone else
- Come from a place known to be a source of human trafficking
- Have had the fees for their transport to the country of destination paid for by facilitators, whom they must pay back by working or providing services in the destination
- Have no access to their earnings
- Work excessively long hours over long periods
- Not have any days off
- Live in poor or substandard accommodations
- Have no access to medical care
- Have limited or no social interaction
- Have limited contact with their families or with people outside of their immediate environment
- Be unable to communicate freely with others
- Be under the perception that they are bonded by debt
- Be in a situation of dependence • Have acted on the basis of false promises