

Section 1 - Policy

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 include the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

1.2 HubEurope Ltd has a zero-tolerance approach to modern slavery within the business and supply chains and we are committed to acting ethically and with integrity in all our dealings and relationships. We will implement and enforce effective systems and controls to ensure that modern slavery is not taking place anywhere in HubEurope Ltd or within any third parties (agencies) that we are associated with.

1.3 All staff will be made aware of the issues surrounding slavery and human trafficking, whilst being encouraged and supported to report any concerns to HubEurope Ltd management. HubEurope Ltd will also support any staff that may be subject to slavery or human trafficking.

1.4 Where modern slavery or human trafficking is identified, HubEurope Ltd will share information with the specific (to geographical area where client lives) Safeguarding Team to safeguard the individual from harm and with the objective of preventing future situations arising, to promote the elimination of routes and sources of slavery or human trafficking.

1.5 All line managers are responsible for ensuring that those reporting directly to them comply with the provisions of this policy in the day-to-day performance of their roles.

1.6 All employees who suspect any members of the workplace being victim of modern slavery must notify their line manager.

1.7 HubEurope Ltd will take steps to ensure that sufficient communication and employee awareness training is undertaken with regards to Modern Slavery.

1.8 All employees will be made aware of the Whistleblowing Policy and Procedure at HubEurope Ltd. The purpose of this policy and associated procedure is to enable HubEurope Ltd to thoroughly investigate allegations of any wrongdoing raised by employees within HubEurope Ltd without fear of reprisal.

1.9 HubEurope Ltd will use this policy to underpin and inform any statement on slavery and human trafficking that we may be required to produce to meet the requirements of Section 54 of the Modern Slavery Act 2015 (MSA).

Section 2 - Procedure

2.1 Reporting Modern Slavery and Human Trafficking Concerns

The following procedure must take place where there are any concerns that someone is a victim of modern slavery or human trafficking. HubEurope Ltd must ensure that staff are aware that victims of modern slavery or trafficking will often not self-identify. Many will present with a different issue.

1) A concern is identified - this could be a Client as a victim or perpetrator, or a Client informs us of a concern they have

2) If an individual is, or group of people are, in immediate risk of danger or harm, the police must be immediately notified on 999

3) The staff member must discuss this with their line manager (where appropriate) and the Hub Europe H.R. Contact.

4) The H.R. Contact contacts and escalates the concern immediately to specific to geographical area where client lives Safeguarding Adults Team

2.2 Safer Recruitment

All staff engaged with providing services at HubEurope Ltd will be subject to thorough and rigorous recruitment procedures that may include a DBS check, identity check, confirmation of validity to work in the UK, employment history, suitability for the role and references. This will minimise the chance of employing a person that has been, or is subject to, slavery or human trafficking.

HubEurope Ltd will follow the Right to Work Checks Policy and Procedure to ensure that a robust and fair process is followed at all times.

2.3 HubEurope Ltd will only use staff provided by third-party organisations (such as agencies) that are either registered with the regulator or who can confirm that the staff being supplied are free to work in the UK and meet all the requirements for the role being provided for.

2.4 Training

All staff will undertake training on Modern Slavery and Human Trafficking. This will ensure that they are aware of the indicators of modern slavery which include:

- Individuals not being paid for the work they undertake
- Individuals being held in debt bondage (being told they “still” owe money after having paid off a previous debt)
- An individual’s passport being held by their “employer” in order to keep the individual at work
- Multiple benefit claimants having their benefits being paid into the same account
- An individual not having the freedom of movement (i.e. passport being taken)
- Clear exploitation of an individual by another for financial or sexual gain
- Shows signs of physical or psychological abuse, look malnourished or unkempt, anxious/agitated or appear withdrawn and neglected. They may have untreated injuries
- Rarely be allowed to travel on their own, seem under the control, the influence of others, rarely interact or appear unfamiliar with their neighbourhood or where they work
- Relationships which do not seem right - for example, a young teenager appearing to be the boyfriend/girlfriend of a much older adult
- Be living in dirty, cramped or overcrowded accommodation, and/or living and working at the same address
- Have no identification documents, have few personal possessions and always wear the same clothes day in and day out. What clothes they do wear may not be suitable for their work
- Have little opportunity to move freely and may have had their travel documents retained, e.g. passports
- Be dropped off/collected for work on a regular basis either very early or late at night
- Unusual travel arrangements - children being dropped off/picked up in private cars/taxis at unusual times and in places where it is not clear why they would be there
- Avoid eye contact, appear frightened or hesitant to talk to strangers and fear law enforcers for many reasons, such as not knowing who to trust or where to get help, fear of deportation, fear of violence to them or their family

2.5 Staff will be advised that if they are subject to slavery or human trafficking, if they are aware of any individual that may be subject to slavery or has been trafficked, or if slavery or human trafficking is disclosed to them they must inform the Registered Manager of HubEurope Ltd or the police.

2.6 Modern Slavery Annual Reporting during COVID

The Government guidance states that under section 54 of the Modern Slavery Act 2015, certain businesses are required to publish an annual modern slavery statement setting out the steps they have taken to identify and address their modern slavery risks. During the coronavirus pandemic, it is essential that HubEurope Ltd continues to identify and address the risks of modern slavery in operations and supply chains. As well as focusing on the health and safety of workers, HubEurope Ltd will consider how fluctuations in demand and changes in the operating model may lead to new or increased risks of labour exploitation.

If HubEurope Ltd needs to delay the Modern Slavery statement

The challenges presented by the coronavirus pandemic may mean that HubEurope Ltd will not be able to publish the statement within the usual timeframe. Where HubEurope Ltd needs to delay the

publication of the modern slavery statement by up to 6 months due to coronavirus- related pressures, HubEurope Ltd understands that we will not be penalised. In the statement, HubEurope Ltd will state the reason for any delay.

2.7 Recruitment risks during COVID-19

Some suppliers may be seeking to recruit additional workers in order to meet increases in demand. HubEurope Ltd will ensure that rigorous recruitment checks are maintained and that suppliers adhere to the same robust processes to ensure that vulnerable workers are not being exploited by third parties seeking to profit from heightened demand.

2.8 The Health and Safety of Workers

As a responsible organisation, it is important that the relevant local or national government policies are implemented throughout the supply chain at HubEurope Ltd. HubEurope Ltd will ensure that suppliers adopt social distancing measures and pay statutory sick pay to prevent the spread of coronavirus as part of due diligence processes.

2.9 Risk Assessment during COVID-19

HubEurope Ltd will undertake a risk assessment of how suppliers are operating during COVID-19 to highlight and help identify where there are risks of Modern Slavery or Human Trafficking occurring. A Template in the QCS Management system will be used where appropriate.

2.10 Review of Effectiveness

HubEurope Ltd intends to take further steps to identify, assess and monitor potential risk areas in terms of modern slavery and human trafficking, particularly in the supply chains of our providers.

We will also continue to:

Support our staff to understand and respond to modern slavery and human trafficking.

Gain assurance that all staff at HubEurope Ltd have access to training on how to identify victims of modern slavery and human trafficking

Review the Safeguarding Policy and Procedure at HubEurope Ltd to ensure that Modern Slavery and Human Trafficking are integral within the content and staff are directed to support and advice as needed

2.11 Indicators of Forced Labour

Individuals may show signs of psychological or physical abuse. They might appear frightened, withdrawn or confused

Workers may not have free movement and may always be accompanied

Individuals often lack protective equipment or suitable clothing and have not been trained to safely fulfil the requirements of the role

The person may not have access to their own documents, such as ID or their passport, with the employer having confiscated them

Individuals may not have a contract and may not be paid National Minimum Wage or not paid at all
Workers are forced to stay in accommodation provided by the employer. This accommodation could be overcrowded

Individuals could live on site

Workers could be transported to and from work, potentially with multiple people in one vehicle

The person might not accept money or be afraid to accept payment

Workers may work particularly long hours