



## MODERN-DAY SLAVERY POLICY

### 1. Introduction

The Organisation recognises that slavery and human trafficking remains a hidden blight on our global society. The Modern Slavery Act 2015 aims to stamp out this illegal practice, which is common in UK employment sectors such as agriculture, retail, hospitality and construction. This policy reflects our commitment to act ethically and with integrity in all our business relationships and to implement and enforce effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

### 2. Scope

This policy applies to all volunteers, subsidiaries, consultants and associates. An associate includes any person working as a subcontractor; as a joint venture partner or agent. For the purposes of this policy, all these entities shall be collectively referred to as "volunteers" or "you".

This policy does not form part of your contract and is therefore non-contractual except where it is expressly stated or where statute is in place to imply otherwise.

### 3. Modern-day slavery

A proportion of workers do not work of their own free will; they are forced to work and are exploited. They are deprived of their freedom for the financial gain of their exploiter. They end up in this situation, whether by deception or coercion.

This crime occurs on any continent in any country, and anywhere exploiters try to make money out of vulnerable people.

Exploitation of forced labour is one of the key types of modern-day slavery. Labour-intensive sectors where temporary and irregular work is common, as well as low skilled and low waged jobs, are considered high-risk sectors for forced labour.

### 4. Definition of terms

#### *Modern Slavery*

An umbrella term that covers various terminologies used by different entities and people when referring to slavery forced and bonded labour, human trafficking and the worst forms of child labour. The 2016 Global Slavery Index defines modern

slavery as "situations of exploitation that a person cannot refuse or leave because of threats, violence, coercion, abuse of power or deception".

### *Human trafficking*

The act of recruitment, transportation, transfer, harbouring or receipt of persons through the threat or use of force or other forms of coercion, abduction, fraud, deception, the abuse of power or a position of vulnerability, or the giving or receiving of payments or benefits to achieve the consent of a person having control over another person for exploitation.

### *Exploitation*

Taking unfair advantage of another person in a work situation, where the element of 'unfairness' is established against a benchmark established in law.

### *Forced labour*

All work which is exacted from any person under the menace of any penalty and for which the person has not offered themselves voluntarily. The legal obligation of Companies in the UK is to prevent forced labour in their practices or supply chains.

### *Bonded labour or debt bondage*

Where a person has pledged their labour as security for a debt, where the fair value of that labour is not reasonably applied, ie. the person is tricked and trapped into working for very little or no pay. The debt is often a loan provided to cover the recruitment fee and travel to take up the role.

## **5. Risks**

The two main risks areas identified in the entertainments industry are labour and building materials.

## **6. Labour risks**

The sector is the most predisposed [to exploitation] because it has to subcontract. When you have a contractor who assigns a subcontractor, who will also appoint another subcontractor, who will try to earn as much money as possible, there is a higher potential for exploitation. At the end of the chain, some workers may be working and possibly living in a very precarious situation.

For anyone who wants to instigate a building or site build project, the risk of modern slavery begins with the hiring of the main contractor. Does the contractor comply with legal and social standards in the employment of its staff? Beyond that, and depending on the size of the project, does the contractor have appropriate policies and practices in place to prevent third-party contractors, such as labour providers, from using people in modern slavery conditions? Using labour providers can be a time-saving and cost-effective practice for both contractor and client, but human rights compliance should be part of decision-making. For larger projects, there are often many more tiers in the labour supply chain. The main contractor hires several subcontractors for different parts of the project. They, in turn, could use labour providers to supply workers for their sites or outsource some of their work to subcontractors. And this can involve many steps. The European Union Agency for Fundamental Rights draws attention to the fact that "workers from other countries employed on construction sites are often confronted with complicated and opaque legal situations involving labour brokers and subcontracting. This makes it difficult for them to understand their rights and against whom their claims should be directed. Hence the workers' practical means of understanding whether they have been paid in accordance with what was agreed, and therefore their ability to claim payments due to them, are fairly restricted, which places them at the mercy of employers."

## **7. Building material risks**

There is also a risk of modern slavery in the supply chain for the materials being used. Do the client and contractor know where all the materials come from, whether they buy them themselves or subcontractors purchased them?

There is also a risk beyond the supply chain's first tier. Who was involved in producing material such as bricks or windows, all the way back to the raw materials used?

Companies may unknowingly and unintentionally be supporting forced labour in their procurement of materials due to a lack of transparency in the full chain of vendors and suppliers. It is important the transparency is increased and that contractors require all levels in their supply chain to confirm their commitment to ethical working. Recent UK regulations by way of the Modern Slavery Act 2015 as well as new and evolving technologies to track supply chains are changing the landscape. Construction businesses are at risk of non-compliance with ethics laws encompassing modern slavery due to a lack of supply chain visibility.

### 8. What can we do?

For example, while walking around a festival site, a project manager might notice some operatives acting as if scared, or who seem unwilling to draw attention to themselves. This might manifest itself at the start or end of the working day when a supervisor appears to be keeping an over-zealous watch on those being transported in a minibus. This is more likely to happen if a subcontractor is operating on a labour-only basis with non-skilled trades, such as labourers or the site clean-up gang.

Or you may also become aware of strange payment provisions being used where an individual site operative is not receiving money directly. If you are working in commercial management at contracting organisations are also more likely to be aware of such practices occurring on-site or in their direct supply chain.

In addition to remaining aware while on-site, people may have an opportunity to introduce suitable provisions at the point of contract design and formation to better monitor the condition and provision of on-site labour. It is, however, acknowledged that this might be of limited use when the abuse is taking place a long way down the labour supply chain. All managers are nevertheless under an obligation to report any suspicious activity to the GLAA. (Gangmasters and Labour Abuse Authority)

While the police do raid premises, usually those where the workers are living, a 2017 report from HM Inspectorate of Constabulary concluded that the introduction of the 2015 act has yet to lead to significant improvements in the police response. The report also noted that where the police addressed matters, there tended to be too much emphasis on safeguarding the victims rather than prosecuting the perpetrators of the crimes.

While many professionals do not control or are not responsible for the direct employment of labour, they should be alert to such practices happening on-site and raise any concerns with the GLAA.

Any suspicious activity or concern can be reported confidentially to Moira Conlon on 07719 465594

### 9. Corporate policy

The Organisation will achieve the aims of this policy by our initiative to identify and mitigate risk in the following ways (But not limited to):-

- more stringent vetting and investigation of our supply chain (contractors, sub-contractors, policies, contracts)
- continually audit & review our practices for checking that all volunteers are paid at least the minimum wage and have the right to work in the UK
- encouragement of the reporting of concerns and the protection of whistleblowers
- not knowingly providing to support or dealing with any business involved in slavery or human trafficking
- operating zero tolerance to slavery and human trafficking and expecting all those in our supply chain and contractors to comply with these standards
- to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff.

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- completion of audits by Directors
- use of labour monitoring and payroll systems; and

## MODERN-DAY SLAVERY POLICY

- level of communication and personal contact with the next link in the supply chain and their understanding of, and compliance with, our expectations.

This policy is following Section 54 of the Modern Slavery Act 2015 and constitutes our Organisation's slavery and human trafficking statement.