

## MODERN DAY SLAVERY ACT 2015 POLICY STATEMENT

Locum Vision recognises that slavery and human trafficking remains a hidden blight on our global society. The aim of the Company is to identify our responsibility by alerting staff to the risks, however small, in our business and in the wider supply chain. Staff are expected and encouraged to report concerns to management, where they are expected to act upon them.

We are committed to ensuring that there is no modern-day slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery Policy Statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place.

This Policy takes into account, and supports, the policies, procedures and requirements documented in our Quality Management System, compliant with the requirements of BS EN ISO 9001:2015. The implementation and operation of this management system underlines our commitment to this policy statement. Formal procedures concerning slavery and human trafficking have been established, including disciplinary procedures where they are breached. Additional procedures ensure that this policy is understood and communicated to all levels of the company, and that it is regularly reviewed by the Directors to ensure its continuing suitability and relevance to the company activities

The Company will achieve these aims 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 etc.).
- Continually audit & review our practices for checking all employees are paid at least the minimum wage and have the right to work;
- We encourage the reporting of concerns and the protection of whistleblowers.
- The company will not knowingly support or deal with any business involved in slavery or human trafficking.
- We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors comply with our values.

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. All Directors have been briefed on the subject.

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

- Completion of internal and external audits
- Use of labour monitoring and payroll systems;
- Level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations.

This policy is in accordance with Section 54 of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement.

## GUIDANCE ON IDENTIFYING AND SUPPORTING VICTIMS ON MODERN SLAVERY

Please refer to <https://www.gov.uk/government/publications/modern-slavery-how-to-identify-and-support-victims> for an in-depth guide on the process

Signs of a potential victim of modern slavery may include:

- They seem malnourished and tired
- If from overseas, they don't speak much English
- They wear unsuitable clothes for the work, or for the weather
- They appear to be under the control of someone else and reluctant to interact with others
- They are reluctant to make eye contact or talk to people
- They work excessively long hours and seldom, if ever, have days off
- They appear fearful, uneasy, or anxious and distrustful of authorities
- They have untreated injuries
- They allow others to answer questions put to them
- They are confined to their workplace and there may be signs that they also sleep there

Signs someone you know or speak to frequently may be a victim of modern slavery may include:

- They always appear scruffy and unwashed
- They lack personal possessions
- They are frequently dropped off or picked up at unsociable hours
- They don't know their home or work address
- They have limited social contact or contact with their family
- They never seem to have any or much money, despite working long hours
- They don't have possession of their passport, driving license or other identification documents
- You perceive that they are in debt to their boss or someone else
- If female, she has an unwanted or underage pregnancy
- They offer incoherent or changing accounts of events
- They repeat a story that you have heard elsewhere—as if they and others have been instructed to learn it

Signs that a house, flat or other dwelling could be a base for modern slavery

- The property seems too small for the numbers of people that live there
- People appear to be bundled in and out of the property by others, often during darkness
- There are bars on the windows and/or the curtains are permanently drawn or boarded up
- Large numbers of young women have suddenly been moved into the property, which then receives lots of visitors day and night
- The letterbox has been sealed over
- There is CCTV at the entrance to the property
- The pungent smell coming from the property
- Electricity is being re-routed from neighbouring properties or directly from power lines
- None of these indicators in isolation or combination can give you complete certainty, sometimes it will be a case of acting on your instinct that something is not right.

### **You do not need to be certain to report your concerns.**

There are different referral processes for adult and child victims:

- Consent is required to refer an adult into the NRM. Being recognised as a potential victim, or victim, through the NRM may allow the individual to access support. Where an adult does not consent, the First Responder still has a 'Duty to Notify' the Home Office that they have encountered a potential victim. In all cases, First Responders should consider whether it is appropriate to also refer the potential adult victim to Local Authority Adult Safeguarding Services.
- First Responders should immediately contact local authority children's services when a child victim is identified. First Responders should refer all child victims to the NRM.

- Adult and child referrals, and notifications under the Duty to Notify can be made through the online portal: <https://www.modernslavery.gov.uk/start>

While not all support for adult victims is provided through the National Referral Mechanism (NRM), being recognised as a potential victim, or victim, may allow the individual to access support via the NRM.

Support for adult victims may include:

- access to legal aid for immigration advice
- access to short-term Government-funded support through the Modern Slavery Victim Care Contract (accommodation, material assistance, translation and interpretation services, counselling, advice, etc.)
- outreach support if already in Local Authority accommodation or asylum accommodation
- assistance to return to their home country if not a UK national 5.5. Support for children is provided through the Local Authority. In addition, children may be able to access support from Independent Child Trafficking Guardians. As children do not need to consent to enter the NRM, all children should be referred in.
- Annex F on document provided at <https://www.gov.uk/government/publications/modern-slavery-how-to-identify-and-support-victims> provides further information on support available

Support for child victims may include:

With the exception of children in scope of the devolved decision making pilot, all referrals for children will be undertaken by the SCA.

- Support for child victims of modern slavery is provided through local authorities. Local authorities are the primary service provider for safeguarding child victims regardless of their nationality or immigration. Relevant child protection procedures, as set out in Working Together to Safeguard Children 2023 must be followed if modern slavery is suspected.
- Local safeguarding partners – local authorities, police and clinical commissioning groups - have a duty to work together to safeguard and promote the welfare of children including child victims of modern slavery.
- Independent Child Trafficking Guardians (ICTGs) in England and Wales are an independent source of advice for trafficked children, somebody who can speak up on their behalf and act in the best interests of the child. ICTGs are currently available in two-thirds of local authorities and the Government has committed to rolling out ICTGs across England and Wales.
- Annex G on document provided at <https://www.gov.uk/government/publications/modern-slavery-how-to-identify-and-support-victims> provides further information on support available