

Modern Slavery Policy and Procedure

Associate Development Solutions Ltd (ADS) has a commitment to high ethical standards and our core values underpin our business practice, guide our relationships with client, employees and communities and environment in which we operate, and the rules of conduct for our staff and Associates.

This Modern Slavery Policy and Procedure is a corporate policy and applies to all employees (and associates and contractors, as applicable) of ADS, unless an alternative policy exists within our customer's workplace, and our customers expect us to work to that.

1. What is meant by Modern Slavery? ¹

1.1 Modern Slavery is prevalent across the globe, with an estimated 27.6 million² people in forced labour

1.2 Modern Slavery – includes slavery, servitude, forced and compulsory labour, human trafficking which deprive a person of their liberty in order to exploit for personal or commercial gain. It also includes forced marriage - estimated to be 22 million people across the globe.

1.2.1 Definition of Slavery and servitude: Slavery, in accordance with the 1926 Slavery Convention, is the status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised. Since legal 'ownership' of a person is not possible, the key element of slavery is the behaviour on the part of the offender as if he/ she did own the person, which deprives the victim of their freedom. Servitude is the obligation to provide services that is imposed by the use of coercion and includes the obligation for a 'serf' to live on another person's property and the impossibility of changing his or her condition.

1.2.2 Definition of Forced or Compulsory Labour: Forced or compulsory labour is defined in international law by the ILO's Forced Labour Convention 29 and Protocol. It involves coercion, either direct threats of violence or more subtle forms of compulsion. The key elements are that work or service is exacted from any person under the menace of any penalty and for which the person has not offered him/her self voluntarily.

1.2.3 Definition of Human Trafficking: An offence of human trafficking requires that a person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult. In addition, the exploitation of the potential victim does not need to have taken place for the offence to be committed. It means that the arranging or facilitating of the movement of the individual was with a view to exploiting them for sexual exploitation or non-sexual exploitation. The meaning of exploitation is set out here: [spot-the-signs-glaa.pdf](#)

1.2.4 Definition of Child Labour: Child labour is defined by international standards as children below 12 years working in any economic activities, those aged 12 - 14 engaged in more than light work, and all children engaged in the worst forms of child labour (ILO)³. The term "child labour" is often defined as work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. Whether or not particular forms of "work" can be called "child labour" depends on the child's

¹ Transparency in Supply Chains: a practical guide (2017):

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/649906/Transparency_in_Supply_Chains_A_Practical_Guide_2017.pdf

² [wcms_854733.pdf \(ilo.org\)](http://wcms_854733.pdf (ilo.org))

³ [What is child labour \(IPEC\) \(ilo.org\)](http://What_is_child_labour_(IPEC).pdf (ilo.org))

age, the type and hours of work performed, the conditions under which it is performed and the objectives pursued by individual countries. Children can be particularly vulnerable to exploitation, but child labour will not always constitute modern slavery. It will still be necessary to determine whether, based on the facts of the case, the children in question are being exploited in such a way as to constitute slavery, servitude and forced or compulsory labour or human trafficking. For example, it is possible for children to undertake some 'light work' which would not necessarily constitute modern slavery. 'Light work' is defined by article 7 of ILO Convention No. 138⁴. Children do have particular vulnerabilities which should be considered when determining whether modern slavery is taking place. The Modern Slavery Act 2015 specifically recognises that it is not necessary for a child to have been forced, threatened or deceived into their situation for it to be defined as exploitation.

2. Key Principles

- 2.1 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all employees, suppliers, or business partners over which we exercise control.
- 2.2 All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 2.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy. Managers must identify where additional training on modern slavery is required, for example where an employee is responsible to for managing partnerships or contractors.
- 2.4 All employees must read, understand and comply with this policy.
- 2.5 ADS encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring that no one suffers 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 organisation or in any of our supply chains. Employees who believe they have suffered any detrimental treatment should inform their line manager immediately following the Grievance Policy and Procedure
- 2.6 Training on this policy, and on the risk our business faces from modern slavery in its supply chains, will be provided as necessary following needs analysis.

3. Policy Statement

- 3.1 Under the Modern Slavery Act 2015 modern slavery is a criminal offence. ADS is committed to ensuring that modern slavery is not taking place anywhere within our own business or in any of our supply chains.
- 3.2 ADS is committed to ensuring transparency in our approach to tackling modern slavery and to comply with disclosure obligations under the Modern Slavery Act 2015.
- 3.3 In employment of our own employees we prohibit modern slavery or the hiring of individuals that are under 16 years of age. We fully comply with legislation applicable to the hiring and protection of employees within the workplace and compensation for work undertaken including Health and Safety legislation and minimum wage. ADS does not consider there is a risk of modern slavery being present in its directly employed workforce however we will regularly review our policies and practices.
- 3.4 ADS expects all suppliers, contractors and business partners to observe the same high standards and we will include in our contracts specific prohibitions against the use of forced, compulsory or trafficked labour, or any held in slavery or servitude. We will communicate our approach to all suppliers, contractors and business partners at the outset of our business relationship.

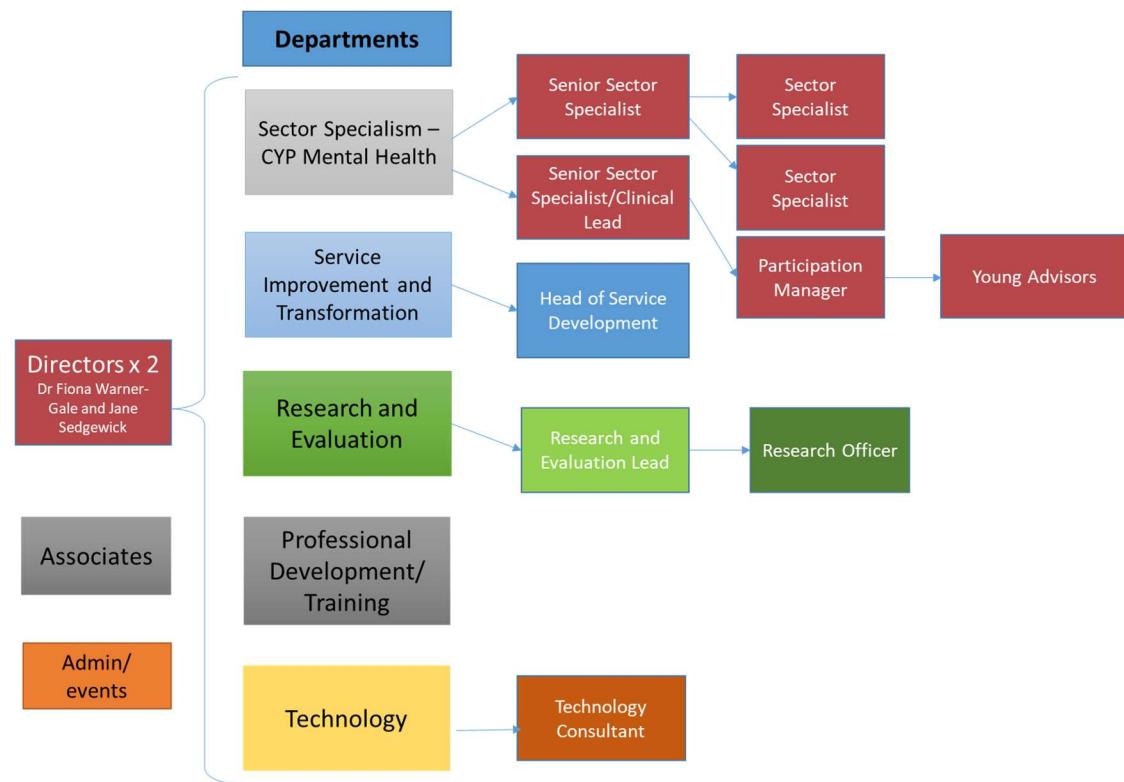
4. Procedure

- 4.1 Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains at the earliest possible stage.
- 4.2 Any employee who believes or suspects a breach of this policy or the Modern Slavery Act 2015 has occurred or that it may occur must notify their line manager, or a Director, as soon as possible.
- 4.3 Employees who are unsure about whether a particular act, the treatment of workers more generally, or working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery can raise it with their line manager, or a Director.

⁴ [Eliminating the worst forms of child labour: a practical guide to ILO Convention no. 182 \(Handbook for parliamentarians, no. 3, 2002\)](#)

- 4.4 Any manager or employee can phone the Modern Slavery Helpline on 0800 0121 700 for more information and guidance on what to do next.
- 4.5 If a specific case of modern slavery is identified in the UK, it should be reported to the police immediately on 101.
- 4.6 Any employee who breaches this policy or the Modern Slavery Act 2015, subject to investigation, may face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 4.7 ADS may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

5. Organisational Chart



This policy and procedure will be reviewed on a 3 year basis or amended in response to changes in future legislation and/or case law.