

Modern Slavery Act 2015 Policy 2023

Policy Promotion and Engagement

All staff working for eVolve your future Ltd are required to read our policy documents and sign to confirm that they have done so.

EYF policies are reviewed annually unless there is a legislative or ethical reason for change to policy during the year. All colleagues are provided with an update document detailing any changes that have occurred following the last review. Each review is dated and version controlled. These changes are discussed in Team meetings with all staff and the understanding of these updates is also confirmed by a signature sheet.

Policies are in place to ensure that the company and it's staff are compliant with statutory legislation, partner regulations and the company specific requirements.

All relevant Policies can be accessed from the eVolve your future website, found at:

www.evolveyourfuture.co.uk

Learners are made aware of the availability of these policies when they are signed up to our courses.

Policies are available to partners on request.

1. Statement

We recognise that modern slavery is a crime and a violation of fundamental human rights. We are aware that modern slavery takes various forms, including 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.

Modern slavery is the term used within the UK and is defined within the <u>Modern Slavery Act 2015</u>. The Act categorises offences of slavery, servitude and forced or compulsory labour and <u>human trafficking</u> (the latter of which comes from the Palermo Protocol).

eVolve your future adopts a zero tolerance to modern slavery, human trafficking, all forms of servitude and forced and compulsory labour.

We fully support the government's objectives to eradicate all forms of modern slavery and human trafficking.

We continue to set high standards of impartiality, integrity, transparency and objectivity. We will ensure that our activities and those of our clients operate to the highest level of ethical standards operating under sound governance arrangements.

1.1 This Policy should be considered alongside the Safeguarding Policy.

2. Definition and examples of Modern Slavery

The different types of abuse that come under the umbrella term of Modern Slavery are:

Slavery, servitude and forced or compulsory labour (s.1 MS Act)

• Human Trafficking (s.2 MS Act) (the purposeful movement of a person for exploitation in whatever form. There is no minimum or maximum distance (i.e. it can be from one room to another)

Exploitation can include (in addition to the above):

- Sexual exploitation (i.e. forced into prostitution, regardless of age of the individual being exploited).
- Removal of organs.
- Securing services by force, threats or deception (in particular if the individual being exploited is a child or an adult at risk). This can also include an individual being forced into committing criminal acts against their will as a possible debt-bondage process.

Indicators of modern slavery 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 freedom of movement (i.e. Passport being taken).
- Clear exploitation of an individual by another for financial or sexual gain.

Under the Modern Slavery Act 2015, we are required to ensure we do not have any aspect of modern slavery within our own organisation and within our supply chain.

eVolve your future is committed to ensuring that there is no slavery, servitude, forced or compulsory human labour, abuse of power over vulnerable individuals, human trafficking or any other form of exploitation as contemplated by the MSA (Modern Slavery Act) in any part of our organisation, client-base, contractors or partners.

3. Public reporting of non-compliance

Individuals who have reasonable suspicion or evidence of non-compliance with the Modern Slavery Act in connection with any eVolve your future supply chain, client or third party contractor we engage with are encouraged to report their concerns to our Director of Financial Crime Compliance using the following email address: RiskKYC@homesengland.gov.uk.

Alternatively, if you hold information that could lead to the identification, discovery and recovery of victims of modern slavery or human trafficking in the UK, you can contact the Modern Slavery Helpline on 08000 121700 or alternatively follow the link to the National reporting mechanism:

 $\frac{https://www.gov.uk/government/publications/how-to-report-modern-slavery/how-to-report-modern-slavery , and }{https://www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-forms}$

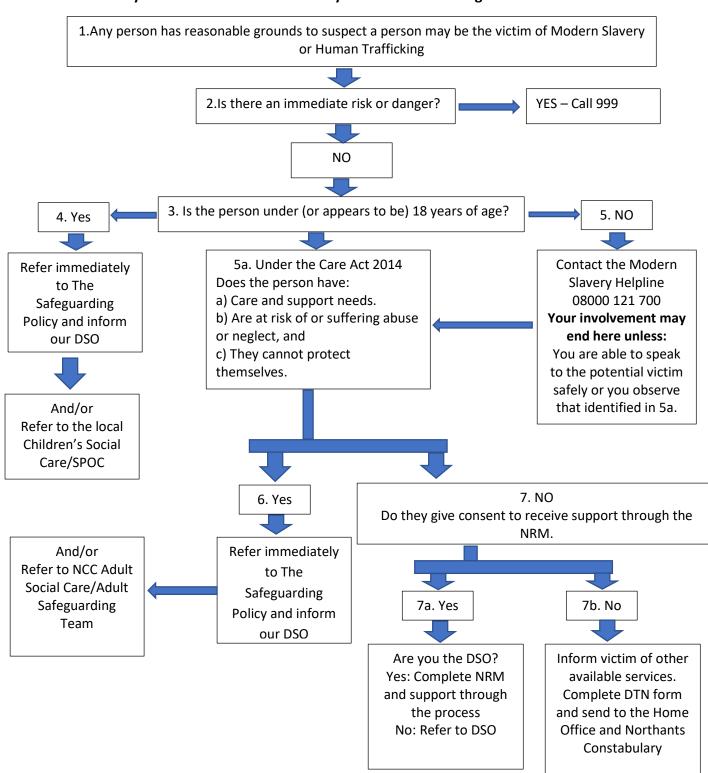
4. Victim support

If you think you are a victim of modern slavery or human trafficking, use the victim support link to contact the Modern Slavery Helpline. Trained operators will help you to understand what is available including information, advice and ways to access government-funded support.

The Modern Slavery Helpline is confidential, but, if you don't want to give your name, that is fine. Modern slavery website https://www.victimsupport.org.uk and hotline 0333 270 7704

The schematic below details reporting procedures where Modern Slavery is suspected

Referral Pathway for Victims of Modern Slavery & Human Trafficking



eVolve your future Ltd Policy Document 2023

4.1 Definitions

• NRM: National Referral Mechanism <u>National referral mechanism guidance: adult (England and Wales) - GOV.UK (www.gov.uk)</u>

• DTN: Duty To Notify

Modern slavery: duty to notify - GOV.UK (www.gov.uk)

Then send to: dutytonotify@homeoffice.gsi.gov.uk

And Contact the police | Police.uk (www.police.uk)

Policy Review

This policy is reviewed at least annually by eVolve your future's Managing Director, Kay Brockall.

Date of latest review: December 2022

Signed:

This policy is next due for review December 2023