



Modern Slavery Act

Current Year: 2023 (Jan. – Dec.)

Version: 1

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Protected

Policy Lead/ Author + Job Title:	Karenza Morgan, Designated Safeguarding Lead
Company Lead (if different to above)	
Priority Level: Red - within 1 year; Amber – within 2 years; green - within 3 years	Amber within 2 years
Review Date:	<i>September 2025</i>
Whom applicable to:	All Futures Staff & SubContractors

Modern Slavery Act Commitment

Our Commitment

The Futures Group is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We recognise that modern slavery is a crime and a violation of fundamental human rights as referenced in the Modern Slavery Act 2015.

We are committed to acting ethically and with integrity in all our business relationships and taking steps to ensure slavery and human trafficking are not taking place in any business or organisation that has any sort of a business relationship with our Company.

Legal Context of the Modern Slavery Act 2015

The offences arising under the 2015 Act are:

Section 1 - Slavery, Servitude, Forced and Compulsory Behaviour.

Section 2 - Arranging or facilitating the travel of another person with a view to exploitation – Human Trafficking.

Section 4 - Committing an offence with intent to commit an offence under section 2

Due diligence processes for slavery and human trafficking.

The Company has zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.

As part of our initiative to identify and mitigate risk the Company has in place systems to encourage the reporting of concerns and the protection of whistle-blowers. Our supply chain providers are mapped to assess a particular service and geographical area and we require these entities to have suitable anti-slavery and human trafficking policies and processes as part of their contractual obligations. The whistleblowing policy is available to employees and any implications in terms of modern slavery can be brought to attention by any employee anytime through reporting to line management and the Designated Safeguarding Lead.

Training

The management team are responsible for compliance within their respective departments and in their supplier relationships and have been trained accordingly. All employees receive an induction into the business where our policies, procedures and expectations are outlined.

Our effectiveness in combating slavery and human trafficking

The Company uses the following key performance indicators 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:

- Safer recruitment practices, right to work documentation and payroll audits
- We maintain a level of communication and personal contact with the next link in the supply chain to ensure their understanding of, and compliance with, our expectations.
- We regularly review supply chain policies, codes of conduct and our working practices to show commitment.
- Undertaking due diligence within our supply chain and mapping to understand where the risks are
- Providing training and resources to staff on modern slavery risks and compliance

Definitions

Slavery Servitude and Forced Labour

- Slavery is when someone actually owns you like a piece of property.
- Servitude is similar to slavery - you might live on the person's premises, work for them and be unable to leave, but they don't own you.
- Forced labour means you are forced to do work that you have not agreed to, under the threat of punishment

Human Trafficking

Human trafficking involves the use of force, fraud, or coercion to obtain some type of labour or commercial sex act. It can happen in any community and victims can be any age, race, gender, or nationality. Traffickers look for people who are easy targets and might use the following methods to lure victims into trafficking situations:

- Violence
- Manipulation
- False promises of well-paying jobs
- Romantic relationships
- Language barriers, fear of their traffickers, and/or fear of law enforcement frequently keep victims from seeking help, making human trafficking a hidden crime.
- Psychological or emotional vulnerability
- Economic hardship
- Natural disasters
- Political instability

Indicators of Human Trafficking

- Person appears disconnected from family, friends, community
- A child stopped attending school.
- Person has had a sudden or dramatic change in behaviour.
- Young person engaged in commercial sex acts.
- Person is disoriented or confused, or showing signs of mental or physical abuse
- Person has bruises in various stages of healing
- Person is fearful, timid, or submissive.
- Person shows signs of having been denied food, water, sleep, or medical care.
- Person often in the company of someone who seems to be in control of the situation.
- Person appears to be coached on what to say.
- Person is living in unsuitable conditions
- Person lacks personal possessions and appears not to have a stable living situation
- Person lacks freedom of movement, cannot freely leave where they live or have unreasonable security measures.

Not all indicators listed above are present in every human trafficking situation, and the presence or absence of any of the indicators is not necessarily proof of human trafficking.

Associated Policies:

Safeguarding Policy

Whistleblowing Policy