



MODERN SLAVERY POLICY

V1.1

MARCH 2022

ACCIPIO STATEMENT

Accipio Limited is committed to developing its social and environmental responsibilities and takes seriously its obligation to eradicate forced labour within the company. Accipio opposes slavery or human trafficking in the delivery of our service and fully supports the promotion of ethical and lawful business practices within the workplace.

We will have a transparent approach to eliminating modern slavery and will ensure that the company takes appropriate action where necessary. It is the company's intention to promote a modern, enlightened and decent working environment and to safeguard our employees from all forms of abuse.

We will manage our business to ensure that conduct and standards across all our streams operate under the same commitment and;

- Adhere to legislation in relation to minimum age requirements, wages and the Working Time Directive.
- Ensure that all employees have the right to work within the UK by conforming to all necessary legal regulations.
- Develop policies and procedures that demonstrate compliance aligned with our social responsibilities, including Codes of Conduct, a vigorous recruitment and selection programme and thorough vetting and compliance process.

Accipio is also committed to providing on-going awareness training to employees on the laws and policies relating to human slavery and trafficking.

DEFINITION

“Modern slavery and human trafficking. Modern Slavery is the term used within the UK and is defined within the Modern Slavery Act 2015. ... These crimes include holding a person in a position of slavery, servitude, forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after.”

<http://www.nationalcrimeagency.gov.uk/crime-threats/human-trafficking>

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Although human trafficking often involves an international cross-border element, it is also possible to be a victim of modern slavery within your own country.

It is possible to be a victim even if consent has been given to be moved.

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Children cannot give consent to being exploited therefore the element of coercion or deception does not need to be present to prove an offence.

Here are several broad categories of exploitation linked to human trafficking, including:

- Sexual exploitation
- Forced labour
- Domestic servitude
- Organ harvesting
- Child related crimes such as child sexual exploitation, forced begging, illegal drug cultivation, organised theft, related benefit frauds etc
- Forced marriage and illegal adoption (if other constituent elements are present)

SCOPE

The scope of this policy is to outline the steps that any Accipio staff member should take, should they have any concerns around modern slavery.

WHAT TO DO

This policy should be used in conjunction with the following policies:

- Whistleblowing Policy
- Safeguarding Policy
- Anti-bribery Policy

If you have any concerns or need advice on what to do, you should seek advice as soon as possible. If there is an immediate threat to your own safety or the safety of others, you should call the emergency services on 999 and ask for the Police.

All concerns around modern slavery should be reported to the DSL or the DDSL (Deputy).

WHAT WE DO

We will ensure that all of our staff and learners are aware of modern slavery and we will educate them on how to act on concerns.