

DANBRO

Accounting For Life



Anti-Slavery And Human Trafficking Policy

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1.0 Policy Statement

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, agency workers, seconded workers, volunteers, contractors, external consultants, third party representatives and business partners.

2.0 Modern Slavery

Modern Slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking. We have a zero-tolerance approach to Modern Slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships.

3.0 Supply Chains

We are also committed to ensuring there is transparency in our own business and in our approach to tackling Modern Slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting process, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, and we expect that our suppliers will hold their own suppliers to the same high standards.

4.0 Responsibility For This Policy

The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

5.0 Due Diligence Process

We have set up an action group in order to ensure our processes continue to comply with the Modern Slavery Act (2015). Following which we have introduced the following due diligence process:

- Regularly reviewing our systems and processes to ensure employee and client information is secure, accurate and auditable

- Identifying those who may be vulnerable and checking on them. Our risk indicators include anyone:
 - Residing in a house with 4 or more other contractor employees;
 - Nationality noted as one of the Countries listed as high on the slavery index;
 - Individuals whose salary is paid into a bank account that is not in their own name
- Reviewing and updating our agreements and contracts with suppliers ensuring that they are also committed to the abolishment of slavery and trafficking by ensuring compliance in their own business and subsequent supply chain
- Ensuring that all employees are paid at least the National Minimum Wage or National Living Wage and NEVER working with businesses who try to avoid this
- Compliance with Agency Workers Regulations which seeks to ensure no worker is paid less than a comparable directly employed individual doing a similar role
- Updating our Anti-Money Laundering checks in line with new legislation which includes:
 - 2017 Money Laundering Regulations
 - 2002 Proceed of Crime Act (POCA) as amended by the Criminal Finances Act 2017
 - Terrorism Act 2000 as amended by the Anti-Terrorism, Crime and Security Act 2001
 - Other anti-terrorism legislation

6.0 Compliance With This Policy

The prevention, detection and reporting of Modern Slavery in any part of our business or supply chain is the responsibility of all those working for us or under our control. You must notify us as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. You are also encouraged to raise concerns about any issue or suspicion of Modern Slavery in any parts of our business or supply chain as soon as possible. You can do this by contacting either of the following as appropriate:

Trafalgar's Client Services Team on 0207 940 3090

Danbro's HR Team on 01253 600 140

The Confidential Modern Slavery Helpline on 0800 0121 700

7.0 Breaches Of This Policy

Any employee who breaches this policy will face disciplinary action which could result in dismissal for misconduct or gross misconduct.

We will terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.