

## HUMAN TRAFFICKING POLICY

### I. POLICY PURPOSE

It is the purpose of the policy that Owen Associates will ensure that appropriate awareness training is available to staff in the identification, assessment, and follow-up care of survivors of human trafficking. The purpose of this policy is to where necessary offer protection to adolescent and adult people who may be victims of human trafficking, and to ensure compliance with The Modern Slavery Act 2015

#### **Transparency in supply chains etc**

A commercial organisation must prepare a slavery and human trafficking statement for each financial year of the organisation.

A commercial organisation falls within this category if it:

- supplies goods or services, and
- has a total turnover of not less than an amount prescribed by regulations made by the Secretary of State.
- An organisation's total turnover is to be determined in accordance with regulations made by the Secretary of State.

A slavery and human trafficking statement for a financial year is:

- a statement of the steps the organisation has taken during the financial year to ensure that slavery and human trafficking is not taking place:
- in any of its supply chains, and
- in any part of its own business, or
- a statement that the organisation has taken no such steps.

An organisation's slavery and human trafficking statement may include information about:

- the organisation's structure, its business and its supply chains;
- its policies in relation to slavery and human trafficking;
- its due diligence processes in relation to slavery and human trafficking in its business and supply chains;
- the parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk;

- its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate;
- the training about slavery and human trafficking available to its staff.

A slavery and human trafficking statement:

- if the organisation is a body corporate other than a limited liability partnership, must be approved by the board of directors (or equivalent management body) and signed by a director (or equivalent);
- if the organisation is a limited liability partnership, must be approved by the members and signed by a designated member;
- if the organisation is a limited partnership registered under the Limited Partnerships Act 1907, must be signed by a general partner;
- if the organisation is any other kind of partnership, must be signed by a partner.

If the organisation has a website, it must:

- publish the slavery and human trafficking statement on that website, and
- include a link to the slavery and human trafficking statement in a prominent place on that website's homepage.

If the organisation does not have a website, it must provide a copy of the slavery and human trafficking statement to anyone who makes a written request for one, and must do so before the end of the period of 30 days beginning with the day on which the request is received.

The Secretary of State:

- may issue guidance about the duties imposed on commercial organisations by this section;
- must publish any such guidance in a way the Secretary of State considers appropriate.

The guidance may in particular include further provision about the kind of information which may be included in a slavery and human trafficking statement.

The duties imposed on commercial organisations by this section are enforceable by the Secretary of State bringing civil proceedings in the High Court for an injunction or,

in Scotland, for specific performance of a statutory duty under section 45 of the Court of Session Act 1988.

For the purposes of this section.

**“Commercial Organisation” means:**

- a body corporate (wherever incorporated) which carries on a business, or part of a business, in any part of the United Kingdom, or
- a partnership (wherever formed) which carries on a business, or part of a business, in any part of the United Kingdom,
- and for this purpose “business” includes a trade or profession;

**“Partnership” means:**

- a partnership within the Partnership Act 1890,
- a limited partnership registered under the Limited Partnerships Act 1907, or
- a firm, or an entity of a similar character, formed under the law of a country outside the United Kingdom.

**DEFINITIONS**

**Human Trafficking** – A modern-day form of slavery involving the illegal trade of people for exploitation or commercial gain. A victim need not be physically transported from one location to another for the crime to fall within this definition.

**Labour Trafficking** – The recruitment, harbouring, transportation, provision, or obtaining of a person for labour or services, through the use of force, fraud or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage or slavery.

**Sex Trafficking** – The recruitment, enticement, harbouring, transportation, provision, obtaining, advertising, maintaining, patronizing, or soliciting by any means of a person of 18 years and older, through force, threats of force, fraud, coercion or any combination of such means that will be used to cause the person to engage in a commercial sex act. In the case of a person who has not attained the age of 18 years, sex trafficking occurs when that person will be caused to engage in a commercial sex act.

If human trafficking is identified, Owen Associates will ensure that immediate contact with the relevant authority is made:

SIGNED: 

DATE: 29.09.24

PRINT: ALUN OWEN

POSITION: DIRECTOR

On behalf of Owen Associates.