Modern Day Slavery Policy

This policy applies to all students, staff working for us or on our behalf in any capacity, including (but not exclusively): employees at all levels, Directors, students, contractors, external consultants, third-party representatives, and academic partners, wherever they may be located. The policy also applies to students when they are acting on behalf of Shockout, either in a paid or a voluntary role.

1. INTRODUCTION

Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015; Modern Slavery Act 2015; Criminal Justice (Scotland) Act 2003; Asylum and Immigration (Treatment of Claimants, etc.) Act 2004; Criminal Justice and Licensing (Scotland) Act 2010.

Modern Slavery encompasses many different types of behaviours and abuse, perpetrated against individuals from any background and of any age. Modern Slavery is abuse and therefore is included in the SEN Safeguarding Policy and Procedures.

Below are the different types of abuse that come under the umbrella of Modern Slavery as follows:

- Slavery, servitude and forced or compulsory labour (Section 1 MS Act)
- Human Trafficking (Section 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)

In addition to the above exploitation can include any of the following:

- 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.

2. POLICY STATEMENT

a. Shockout 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 or in our supply chain.

b. This policy does not form part of any employee's contract of employment, and we may amend it at any time.

3. COMPLIANCE WITH THE POLICY

a All staff, directors, students, contractors, external consultants, third-party representatives, and academic partners

b Prevention, detection and reporting of modern slavery in any part of the business is all our responsibility.

c If there is any suspicions or concerns this should be raised immediately with Human Resources.

d If anyone suspect a breach of this policy is occurring or has occurred or that it may occur, they must notify Human Resources.

e If unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager.

f We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.
We are committed to ensuring no one suffers any detrimental treatment because of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains or partner organisations. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

4. <u>COMMUNICATION AND AWARENESS OF THIS POLICY</u>

a Raising staff awareness of the problem of modern slavery and human trafficking through staff training and induction.

b Raising awareness to all our students through Induction and training sessions.

A statement is published on our website, which clearly reflects that Under the Modern Slavery Act 2015, we do not have any aspect of modern slavery within our own organisation and within our supply chain.