



## Anti Slavery and Human Trafficking

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## Introduction

Property Support Services UK Ltd. (PSS) is committed to improving our working practices to combat slavery and human trafficking in accordance with our obligations under the Modern Slavery Act 2015. We have established robust procedures to ensure that all stakeholders are aware of their individual obligations in combating this insidious and growing problem.

## Scope

Property Support Services UK Ltd, confirms that this policy applies to all persons working for us, or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, agents, contractors and suppliers and we actively promote and encourage compliance in relation to the Modern Slavery Act (2015), which by definition “Modern Slavery” refers to slavery, forced or compulsory labour, human trafficking, and some forms of child labour, to ensure that slavery and human trafficking is not taking place in our business or within our supply chains.

## Policy Statement

Modern slavery is a criminal offence under the Modern Slavery Act 2015. Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain. PSS is committed to ensuring that slavery or human trafficking in any form does not have a place in our business or any part of our supply chain. This policy reflects our commitment to acting ethically and with integrity in all our business relationships including the implementation, enforcement and maintenance of effective controls.

This policy sets out the aims and will clearly define the steps taken to minimise the risks to ensure that our supply chains are transparent, according to the “Transparency in Supply Chains” clause and we voluntarily produce this statement to show our approach to tackling modern slavery to provide a level of assurance to our business and customers.

We strictly prohibit the use of modern slavery and human trafficking in our operations and supply chain and are committed to implementing systems and controls aimed at ensuring this does not take place.

We also expect our suppliers to hold their own suppliers to the same high standards.

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## Definitions of Slavery and Servitude

**Slavery**, in accordance with the 1926 Slavery Convention, is the status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised. Since legal 'ownership' of a person is not possible, the key element of slavery is the behaviour on the part of the offender as if he/ she did own the person, which deprives the victim of their freedom.

**Servitude** is the obligation to provide services that is imposed by the use of coercion and includes the obligation for a 'serf' to live on another person's property and the impossibility of changing his or her condition.

## Definition of Forced or Compulsory Labour

**Forced or compulsory labour** is defined in international law by the ILO's Forced Labour Convention 29 and Protocol. It involves coercion, either direct threats of violence or more subtle forms of compulsion. The key elements are that work or service is exacted from any person under the menace of any penalty and for which the person has not offered him/her self voluntarily.

## Definition of Human Trafficking

An offence of human trafficking requires that a person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult. In addition, the exploitation of the potential victim does not need to have taken place for the offence to be committed. It means that the arranging or facilitating of the movement of the individual was with a view to exploiting them for sexual exploitation or non-sexual exploitation.

## Definition of Child Labour

**Child labour** is defined by international standards as children below 12 years working in any economic activities, those aged 12 - 14 engaged in more than light work, and all children engaged in the worst forms of child labour (ILO).

The term "child labour" is often defined as work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. Whether or not particular forms of "work" can be called "child labour" depends on the child's age, the type and hours of work performed, the conditions under which it is performed and the objectives pursued by individual countries. Children can be particularly vulnerable to exploitation, but child labour will not always constitute modern slavery. It will still be necessary to determine whether, based on the facts of the case, the children in question are

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being exploited in such a way as to constitute slavery, servitude and forced or compulsory labour or human trafficking. For example, it is possible for children to undertake some 'light work' which would not necessarily constitute modern slavery. 'Light work' is defined by article 7 of ILO Convention No. 138.

Children do have particular vulnerabilities which should be considered when determining whether modern slavery is taking place. The Modern Slavery Act 2015 specifically recognises that it is not necessary for a child to have been forced, threatened or deceived into their situation for it to be defined as exploitation.

#### The Worst Forms of Child Labour

The worst forms of child labour are very likely to constitute modern slavery. The worst forms of child labour are defined by article 3 of ILO Convention No. 182 as:

- a. all forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom and forced or compulsory labour, including forced or compulsory recruitment of children for use in armed conflict;
- b. the use, procuring or offering of a child for prostitution, for the production of pornography or for pornographic performances;
- c. the use, procuring or offering of a child for illicit activities, in particular for the production and trafficking of drugs as defined in the relevant international treaties;
- d. work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children.

#### Behaviour constituting modern slavery

Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in many different ways. There is a spectrum of abuse and it is not always clear at what point, for example, poor working practices and lack of health and safety awareness seep into instances of human trafficking, slavery or forced labour in a work environment. However, businesses have a responsibility to ensure that workers are not being exploited, that they are safe and that relevant employment (include wage and work hour), health and safety and human rights laws and international standards are adhered to, including freedom of movement and communications.

There will be cases of exploitation that, whilst being poor labour conditions, nevertheless do not meet the threshold for modern slavery – for example, someone may choose to work for less than the national minimum wage, or in undesirable or unsafe conditions, perhaps for long work hours, without being forced or deceived. Such practices may not amount to modern slavery if the employee can leave freely and easily without threat to themselves or their family. Organisations do still nevertheless have a legal duty to drive out poor labour practices in their business, and a moral duty to influence and incentivise continuous improvements in supply chains.

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## Due Diligence Processes

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain, 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 are evolving and updating our contracting processes to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect our suppliers to hold their own suppliers to the same high standards.

All stakeholders have an obligation to familiarise themselves with our procedures to help in the identification and prevention of modern slavery and to conduct business in such a manner that the opportunity for and incidence of modern slavery is prevented. Adherence to this policy forms part of all stakeholder obligations under their contract of employment, or service supply agreement.

Recognising our statutory obligation to ensure that slavery and human trafficking has no place in our business or supply chain; we have implemented the following measures:

- Conduct risk assessments to determine what parts of our business and which of our suppliers are most at risk of modern slavery, so that efforts can be focused on those areas
- Engage with our suppliers both to convey to them our Anti-Slavery Policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses
- Introduce contractual provisions for our suppliers to confirm their adherence to this policy and accept our right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion.

## Responsibility for the Policy

Responsibility for the prevention of incidents involving allegations of slavery and human trafficking ultimately resides with PSS's leadership. The 'Board' retains responsibility for ensuring that this policy is implemented in accordance with our legal and ethical obligations. Individual Managers are responsible for ensuring that those reporting to them understand and comply with this policy and are provided with adequate, regular and appropriate training on the issue of modern slavery.

## Reporting of Concerns

As an organisation we encourage all stakeholders to communicate concerns in relation to this or any other area and as such would support any attempt at disclosure either direct or anonymously. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting their suspicion that modern slavery in whatever form is, or may be taking place in any part of our business or in any of our supply chains.

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## Communication & Awareness

As an organisation we have adopted a zero-tolerance approach to slavery and trafficking in all its forms, it is therefore essential that all stakeholders are made aware of this policy prior to the formalisation or commencement of employment or commercial relations. Communication is conducted via the following means:

- Formal induction of new employees
- During performance appraisals
- Training via the PSS online Academy
- As part of the due diligence and selection process for new suppliers
- As part of tender and bid submissions

## Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff. All Directors have been briefed on the subject.

## Measuring Effectiveness

As part of our aims and our contract with suppliers, we require that they confirm to us that they are taking effective steps to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. They review the effectiveness of the procedures in place for them and their own suppliers
5. We may terminate the contract at any time should any instances of modern slavery come to light.

## Responding to an incident of modern slavery

If a specific case of modern slavery is identified in the UK, it should be reported to the police immediately on 101. If potential victims are in immediate danger the standard 999 emergency number should be used. There is also a Modern Slavery Helpline on 0800 0121 700. This will allow anyone who thinks they may have come across an instance of modern slavery, or indeed

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who may be a victim themselves, to call for more information and guidance on what to do next.

If modern slavery is identified or suspected abroad, then the response should be tailored to the local circumstances. In some cases, the most appropriate response will be to engage with local NGOs, industry bodies, trade unions or other support organisations to attempt to remedy the situation. In other cases, it will be more appropriate to contact local Government and law enforcement bodies.

Organisations must always consider which approach would produce the safest outcome for the potential victims but should always remember the economic influence and control which the organisation holds over those who may be committing these crimes.

Mechanisms are in place to assist victims of slavery and human trafficking. If you identify a potential victim, they can be referred to the National Referral Mechanism to be formally identified as a victim of modern slavery and offered Government-funded support. Referral for potential adult victims is by consent.

Government-funded support is provided through a range of specialist providers across the UK.

This policy is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the current year.

Review

This policy will be reviewed by the Operational Support Manager on an annual basis or more frequently in response to changes in legislation.

This Policy is endorsed by:

Michael Rust  
Managing Director



29/07/2021

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