



# Modern Slavery

## Response and Remediation Plan and Guidance

November 2020

# Modern Slavery Response and Remediation Plan

How to identify and respond to a potential victim of modern slavery



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## Overview

We condemn slavery in all its forms. We will never tolerate it in our business or supply chain.

Should a situation ever arise where there is evidence or even the suspicion of slavery then this must be addressed. This plan tells you what to do if you suspect any form of modern slavery in our operations (whether using the services provided by our contracts as a means to facilitate Modern Slavery, such as transport, accommodation services etc.) or through our suppliers.

### Step 1 Spotting & Staying Safe

- ✓ Be aware of the signs for modern slavery
- ✓ Understand where there may be risk
- ✓ Be vigilant for the signs
- ✓ Be open if approached

### Step 2 Responding

#### All employees:

- ✓ If you see or suspect modern slavery or you have been approached by a potential victim report it to your manager

#### Manager:

- ✓ If someone has reported possible modern slavery, you have seen or suspect it or you have been approached then you must report it to the police, and
- ✓ inform your Divisional Ethics Compliance Lead or General Counsel
- ✓ cooperate with the authorities
- ✓ actively implement corrective actions (where necessary)
- ✓ work with your Divisional Communications Lead to manage any media or external communications

### Step 3 Maintain confidentiality

- ✓ Maintain confidentiality with potential victims
- ✓ Do not disclose a potential victim's address, support arrangements or other details that may compromise their safety to anyone who is not directly involved in the case.

### Step 4 Cooperation & Remediation

#### All employees:

- ✓ cooperate with Police and any other local authorities and competent local organisations with their investigation

#### Manager:

Work with Divisional Ethics Compliance Lead and procurement to:

- ✓ Conduct an initial assessment of the allegations and establish a remediation plan
- ✓ Ascertain if a supplier or labour provider is implicated
- ✓ Document and maintain the evidence about the violations
- ✓ Monitor and verify that progress with Police and relevant local authorities and local organisations
- ✓ Document and record remedial steps taken.

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Underpinning our Values is the right to be treated with dignity, fairness, equality and respect. We respect the human rights of individuals across all Serco operations and will not engage in any form of modern slavery. We condemn slavery in all its forms. We will never tolerate it in our business or supply chain.

Many countries, notably the United Kingdom and Australia, have adopted specific legislation on Modern Slavery. These legislations give national law enforcement the tools to fight modern slavery, ensure perpetrators can receive suitably severe punishments for these appalling crimes and enhance support and protection for victims.

Should a situation ever arise where there is evidence or even the suspicion of slavery then this must be addressed. This plan tells you what to do if you suspect any form of modern slavery in our operations or supply chain.

## **1 What is modern slavery**

Modern slavery is a serious and brutal crime in which people are treated as commodities and exploited for criminal gain. Modern slavery, in particular human trafficking, is an international problem with victims entering one of the countries in which Serco operates legally, on forged documentation or illegally.

Modern slavery is an umbrella term, encompassing human trafficking, slavery, servitude and forced labour. Someone is in slavery if they are:

- Forced to work through mental or physical threat
- Unpaid or not paid in line with the other workers on site or in line with the local minimum wage
- Owned or controlled by an 'employer' usually through mental or physical abuse or the threat of abuse
- Dehumanised, treated as a commodity or bought and sold as 'property'
- Physically constrained or have restrictions placed on their freedom.

Human trafficking is when men, women and children are moved and forced into exploitation. The movement could be international but also within the country, from one city to another or even just a few streets. A person is a victim of human trafficking even if they have not yet been exploited but have been moved for the purposes of exploitation.

Servitude is like slavery, in that a person is under an obligation to provide a service to another which is imposed on them by coercion.

Forced work is defined as 'work or service which is exacted from any person under the menace of any penalty and for which the person has not offered himself/herself voluntarily and has been found in a number of different industries including manufacturing, food processing, agriculture and hospitality'.

Further definition and an overview of the types of exploitation that can occur are provided in Annex A.

### **1.1 Victims of modern slavery**

Victims of modern slavery or human trafficking may be unwilling to come forward to law enforcement or public protection agencies, not seeing themselves as victims, or fearing further reprisals from their abusers. Victims may also not always be recognised as such by those who come into contact with them.

## 2 How to Identify a Potential Victim of Modern Slavery or Human Trafficking?

Everyone should be aware of the signs to spot potential victims of modern slavery. In order to identify a potential victim of modern slavery, you should be familiar with the following signs:

### PHYSICAL APPEARANCE



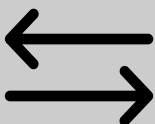
- Appear malnourished
- Appear dirty, worn out clothes, same clothes
- Appear frightened, withdrawn and confused
- Learning difficulties or drug/alcohol dependent
- Injuries (bruises, untreated injuries, cigarette burns) that seem to be the result of an assault
- Work related injuries often through poor health and safety measures
- Shows signs of sexual abuse or has an unwanted pregnancy

### FEW OR NO PERSONAL POSSESSIONS



- No money
- No personal items such as purses, wallets or jewellery
- Few clothes: They may wear the same items all the time, or wear clothes that are unsuitable for work
- No mobile phones as they have been confiscated to prevent them from social interaction with their family and friends
- Little or no food
- Has no passport or other means of identification
- Has false travel/identity documentation
- Is unable to confirm names and addresses of employer / contacts / home / workplace in UK

### ISOLATION AND NO FREEDOM OF MOVEMENT



- Others present their identification documents and speak for them at recruitment
- Others try to book them onto shifts or speak on their behalf when answering calls regarding their availability to work
- One person speaks on behalf of a number of workers and the victims look to him or her for support or permission
- Excessive working hours, no days off and little spare time to get lunch etc.
- Limited or no social interaction and poorly integrated into the community
- Dependence on employer or a third-party for a number of services - for example work, transport and accommodation (for example a driver may drop off and collect them)
- Limited contact with family
- Has not been registered with or attended a GP practice
- Difficult to establish/prove relationship between adult and children

### RELUCTANCE TO SEEK HELP



- Unable to speak local language
- Avoid eye contact
- Appear frightened or anxious
- Afraid to talk
- Refuse or reluctant to talk to a person in authority or provide personal details
- Reject help when offered. This is often because they don't know who to trust or fear retribution

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If you believe that you have spotted signs of modern slavery, you will not be expected to:

- Be able to prove modern slavery. If modern slavery is suspected, but not conclusively proven, the potential victim(s) should still be identified as a such.
- Evaluate indicators to a criminal standard of proof.

You simply need to know and understand the signs which may indicate a person is a victim of modern slavery in order to decide whether to report it or not.

They may not necessarily be considered as evidence of modern slavery but should lead to further work by the First Responder and/or local authorities to gather more evidence as those signs may act as evidence that the person is at risk of exploitation if they are not supported to prevent this.

### **3 Responding to a potential victim of modern slavery**

A potential victim of modern slavery is a potential victim of a crime.

**All Serco staff have a duty to be vigilant to signs of a potential victim of modern slavery or human trafficking and respond to it. We recognise our frontline colleagues are more likely to come into contact with potential victims due to the nature of their jobs, so it is important that everyone knows what steps to take.**

#### **Step 1 – Spotting and Staying Safe**

If you believe that you have spotted signs of a potential victim of modern slavery, you should avoid approaching or interacting with the potential victim to discuss it as you risk endangering not only the victim's health and safety, or their loved ones but also yourself.

If a potential victim of modern slavery approaches you for help, you must arrange to put the potential victim in a safe place, while responding by calling the local Police.

#### **Step 2 – Responding**

##### **All employees**

You must immediately inform the Manager of the site where you have spotted the signs of a potential modern slavery victim or been approached by a potential victim.

##### **Manager**

If you think that you have spotted signs or received a report of a potential victim of modern slavery, you must:

call the local Police immediately but no later than 48 hours of spotting the signs or receiving the report. In instance, where suspicions or concerns may involve children or young people, or where there is serious harm, please contact the local Police immediately without delay.

In parallel, you must:

- inform your Divisional Ethics Compliance Lead or General Counsel so that appropriate measures to support the case can be taken. This might include informing the supplier which employs the potential victim of modern slavery
- cooperate with the authorities
- actively implement corrective actions (where necessary)
- work with your Divisional Communications Lead to manage any media or external communication about the incident to ensure we are not viewed as complicit.

As a Manager, if you want to discuss your concern internally or verify some of the signs spotted before informing the Police, you must contact your Divisional Ethics Compliance Lead or General Counsel within 48 hours of the signs being spotted or raised to you.

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Annex B provides a list of contacts and agencies that act as first responders where an incident of modern slavery has occurred.

You may also use Serco's Speak Up system to report any suspicions of modern slavery ([www.serco-speakup.com](http://www.serco-speakup.com)).

### **Step 3 – Maintaining Confidentiality**

Confidentiality is an important condition in working with potential victims of modern slavery.

Potential victims have information about criminals who have trafficked and exploited them, and this makes them vulnerable. You must not disclose a potential victim's address, support arrangements or other details that may compromise their safety to anyone who is not directly involved in the case.

### **Step 4 – Cooperation and Remediation**

Upon reporting the matter to the local Police, Serco and its staff will cooperate with the Police and any other local authorities and competent local organisations with their investigation.

Serco's process for responding to violations is outlined below:

The Divisional Ethics and Compliance Lead in collaboration with the Manager involved and a member of procurement will:

1. Conduct an initial assessment of the allegations to ensure that there is enough information to understand the exploitation discovered and establish a remediation plan (including reviewing internal policies and procedures to determine what needs to change to prevent modern slavery from re-occurring).
2. Ascertain if a supplier or labour provider is implicated.
3. Document and maintain the evidence about the violations
4. Monitor and verify that progress with Police and relevant local authorities and local organisations
5. Document and record remedial steps taken.

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## Annex A – Types of exploitation resulting from modern slavery

There are different types of exploitation that victims of modern slavery may be subjected to, and victims may experience more than one type of exploitation at the same time.

The most common forms of exploitation are:

- **Labour exploitation:** a victim is made to work with little or no pay and may face violence or threats. If they are foreign nationals, their passports may be confiscated by their exploiters and they may be made to live in terrible conditions and under constant threat. For example, a worker in a clothing factory, who is dropped off and picked up from work and made to pay exorbitant fees for transport, accommodation and routinely shifted around to differing places of work.
- **Debt bondage:** can be present in many forms of exploitation and can take a range of forms. Debts may arise out of the exploitation itself, for example in relation to accommodation or travel fees, with victims having little or no control over their debt and little or no way to pay it back. Costs may be deducted from their wages, leading to further debts being accrued. A person may be forced to work to pay off the debt and it can also be used as a means of controlling a victim and keeping them enslaved.
- **Forced criminality:** victims can be forced to participate in a range of illegal activities including pick pocketing, shop lifting, cannabis cultivation, county lines exploitation and other activities. The Modern Slavery Act provides for a defence for victims who have been forced into criminality.
- **Financial exploitation:** for example benefit fraud, where benefits are falsely claimed by perpetrators on behalf of their workers; bank accounts being opened in a victim's name but used by perpetrators; or workers' wages being paid directly into the exploiters, own bank accounts by companies who think they are paying a worker individually.
- **Domestic servitude:** victims work in a household where they may be ill-treated, humiliated, subjected to exhausting hours, forced to work and live under unbearable conditions or forced to work for little or no pay. In some cases, forced marriage can lead to domestic servitude.
- **Forced marriage:** where people are forced into marriage for a range of reasons including exploiting the rights conferred on them by citizenship or for domestic servitude. Children or young people under the age of consent are also victims through culture, religion and/or family traditions.
- **Sexual exploitation:** victims (including children) may be forced into prostitution, pornography or lap dancing for little or no pay. They may be deprived of their freedom of movement and subjected to threats and violence.
- **Organ harvesting:** victims are trafficked in order for their internal organs (typically kidneys or the liver) to be harvested for transplant.



## Annex B – Contacts and first responders

Division	Organisation	Contact details
ASPAC - Australia	Emergencies	Phone: 000
	Australian Federal Police	Phone: 131 237 or <a href="http://www.afp.gov.au">www.afp.gov.au</a>
	Anti-Slavery Australia Agency	Phone: 02 9514 8115 or <a href="http://www.antislavery.org.au">www.antislavery.org.au</a>
	Salvo's (Local name for the Salvation Army)	Phone No: 13 SALVOS (13 72 58)
ASPAC – New Zealand	MBIE Service Centre to report migrant exploitation	Phone: 0800 20 90 20 or <a href="https://www.mbie.govt.nz/immigration-and-tourism/immigration/temporary-migrant-worker-exploitation-review/">https://www.mbie.govt.nz/immigration-and-tourism/immigration/temporary-migrant-worker-exploitation-review/</a>
	Crimestoppers (to report anonymously)	Phone: 0800 555 111 or fill out a form on <a href="http://crimestoppers-nz.org">crimestoppers-nz.org</a> (external link)
	New Zealand Police	Phone: 105 or emergency line: 111
ASPAC – Hong-Kong	The Mekong Club	Website: <a href="https://themekongclub.org/">https://themekongclub.org/</a>
Serco America - United States of America	Polaris Project - U.S. National Hotline	Phone: +1-888-373-7888 Text 'ToBeFree' 233733 Online: <a href="https://polarisproject.org/our-work/">https://polarisproject.org/our-work/</a>
	US Department of Homeland Security's Tip Line	Phone: +1-802-872-6199 (also works within US and Canada) Employees around the world can also submit a tip online at <a href="https://tips.fbi.gov">https://tips.fbi.gov</a> .
Serco America - Canada	The Canadian Human Trafficking Hotline (in French and English)	Phone: +1-833-900-1010 Online: <a href="https://www.canadiancentretoendhumantrafficking.ca/nationalhotline/">https://www.canadiancentretoendhumantrafficking.ca/nationalhotline/</a>
Middle East - UAE	Dubai Police-Control Centre of Human Trafficking	Phone: +9714-6082347
	Hotline for labour complaints	Phone: 8005005
	Hotline for human trafficking issues	Phone: 8007283
Middle East - Iraq	Asuda (International organization for migration helpline)	Phone: +964 53 318 3149
Middle East - Qatar	National Human Rights Committee	Phone: +974 4404 8844
	Aman Protection and Social Rehabilitation Center shelter (more for women and children)	Phone: 919
Middle East – Saudi Arabia	National Committee to Combat Human Trafficking	Phone: 0117185118 or Online complaint portal: <a href="https://e=services.hrc.gov.sa">https://e=services.hrc.gov.sa</a>

Division	Organisation	Contact details
UKE – UK	Unseen UK	Phone: 08000 121 700 Report online: <a href="https://www.modernslaveryhelpline.org/">https://www.modernslaveryhelpline.org/</a> Website: <a href="http://www.unseenuk.org">www.unseenuk.org</a>
	Gangmasters Licensing Agency	Phone: 0800 432 0804 Website: <a href="https://www.gla.gov.uk/report-issues/english-report-form/">https://www.gla.gov.uk/report-issues/english-report-form/</a>
	Salvation Army	Phone: 0300 303 81 51 Email: <a href="mailto:info@salvationarmy.org.uk">info@salvationarmy.org.uk</a> Website: <a href="http://www.salvationarmy.org.uk/uki/Trafficking">www.salvationarmy.org.uk/uki/Trafficking</a>
	Migrant Help	Phone: 01304 203 977 or 07766 668 781 Email: <a href="mailto:info@migranthelpuk.org">info@migranthelpuk.org</a> Website: <a href="http://www.migranthelpuk.org">www.migranthelpuk.org</a>
	UK Border Force	The Immigration Enforcement Hotline Phone: 0300 123 7000 Crimestoppers Phone: 0800 555111
	POPPY Project (for women and children)	Phone: 020 7735 2062 (ask for the POPPY Project duty worker) Email: <a href="mailto:post@eavesforwomen.org.uk">post@eavesforwomen.org.uk</a> Website: <a href="http://www.eavesforwomen.org.uk/about-eaves/our-projects/the-poppy-project">www.eavesforwomen.org.uk/about-eaves/our-projects/the-poppy-project</a>
	Trafficking Awareness Raising Alliance (TARA) - Scotland	Phone: 0141 276 77 24
	National Society for the Prevention of Cruelty to Children (NSPCC).	Help for adults concerned about a child Phone: 0808 800 5000 Help for children and young people Phone: 0800 1111
UKE- Ireland	Government Hotline	Phone: 1800 25 00 25 Email: <a href="mailto:blueblindfold@garda.ie">blueblindfold@garda.ie</a>
UKE - France	Comite Contre L'esclavage Moderne (Committee Against Modern Slavery)	Phone: 01 44 52 88 Email: <a href="mailto:info@ccem.org">info@ccem.org</a> Website : <a href="http://www.esclavagemoderne.org/signaler-une-situation/">http://www.esclavagemoderne.org/signaler-une-situation/</a>
	National Coordination for protection of victims of human trafficking hotline (Ac.Sé)	Phone: 0 825 009 907 Website: <a href="http://acse-alc.org/fr/">http://acse-alc.org/fr/</a>
UKE – Spain	Spanish Agency for International Development Cooperation (AECID)	Website with contact details: <a href="https://www.aecid.es/ES/servicios/informacion-y-contactos">https://www.aecid.es/ES/servicios/informacion-y-contactos</a>
UKE - Italy	Associazione on the Road Onlus di Martinsicuro	Website with contact details: <a href="https://www.ontheroad.coop/en/contacts/">https://www.ontheroad.coop/en/contacts/</a>
	National hotline against trafficking	Phone: 800 290 290
UKE – The Netherlands	CoMensha (in Dutch)	Phone: +31 33 4481186
UKE - Austria	IBF - Intervention Centre for Victims of Trafficking in Women	Phone: + 43 1-796 92 98
	Anti- trafficking hotline	Phone: +43 1 24836 85383

Division	Organisation	Contact details
UKE - Belgium	PAG-ASA	Phone: + 32 2 511 64 64
	Payoke	Phone: + 32 2 511 64 64
UKE - Luxembourg	Luxembourg national contact for expertise in the field combating and preventing trafficking in Human Beings (Police Grand-Ducale)	Phone: +352 4997 6210 Out of hours contact: Centre d' Intervention National: +352 4997 2341
UKE - Germany	Anti-trafficking hotline (Hamburg) Violence against women support hotline	Phone: +49 176 57 21 65 54
	Anti-trafficking hotline (Berlin)	Phone: +49 157 53 33 35 15
	Police (emergency)	Phone: 110
	Violence against women support hotline	Phone: 08000 116 016