

Group Standard Operating Procedure Modern Slavery Response and Remediation



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¹ As used herein, Serco Group and its affiliates, subsidiaries and operating companies are referred to as "Serco", "The Company" or "company", or "we", "us" or "our"

Version history

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1.0	December 2020	Initial document providing the response and remediation process in case of a modern slavery incident	Robert Smith, Director Business Compliance and Ethics

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1 Introduction and Applicability

We condemn slavery in all its forms. We do not tolerate it in our business or supply chain.

Should a situation ever arise where there is evidence or the suspicion of slavery, this must be addressed. This GSOP describes the process to be followed should any form of modern slavery be suspected in Serco's operations (whether using the services we provide, or using the assets we manage as a means to facilitate Modern Slavery, such as transport, accommodation services etc.) or suspected in a Third Party we work with.

2 Requirements

Victims of modern slavery are victims of a crime. Therefore, all Serco staff should remain vigilant to signs of a potential victim of modern slavery or human trafficking and respond to it by taking the steps outlined here.

This GSOP is supported by a Modern Slavery Response and Remediation Plan which provides additional guidance to the following steps.

Step 1 – Spotting and Staying Safe

If you see signs of modern slavery and believe an individual(s) are subject to modern slavery you should not approach them or raise your concerns with them, as you may put their life at further risk. Often victims of modern slavery are controlled by gangs and traffickers, who may threaten the victims' own safety or their family's safety. Likewise, you may be exposing yourself to potential harm.

If potential victim(s) of modern slavery request help, they should be put in a safe place and the local police contacted immediately.

Annex A provides details on the typical signs of modern slavery.

Step 2 – Responding

All employees

Must immediately inform the Manager of the site where the signs of a potential modern slavery victim have been spotted or where an approach has been made by a potential victim.

Manager

If a manager spots signs of or receives a report of a potential victim(s) of modern slavery, they should call the local Police immediately but no later than 48 hours of spotting the signs or receiving the report. In instances, where suspicions or concerns may involve children or young people, or where there is serious harm, the local Police should be contacted without delay.

If a manager is unsure then the situation should be discussed with Divisional Ethics Compliance Lead.

In parallel the manager should:

- inform Divisional Ethics Compliance Lead or General Counsel within 48 hours of the signs being spotted or raised 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 Divisional Communications Lead to manage any media or external communication about the incident to ensure Serco is not viewed as complicit.

Step 3 – Maintaining Confidentiality

Confidentiality is important when working with potential victims of modern slavery.

Potential victims have information about criminals who have trafficked and exploited them, and this makes them vulnerable. A potential victim's address, support arrangements or other details that may compromise their safety must not be disclosed 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 authorities and competent 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.

3 Roles & Responsibilities

3.1 All employees

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 meet potential victims due to the nature of their jobs, so it is important that everyone knows what steps to take.

3.2 Managers

- Make staff aware of the red flags associated with modern slavery and the signs to look out for
- Ensure all observations or reports of potential modern slavery are timely handled and within 48 hours unless it involves children or serious harm when it should be done immediately
- Report suspected incidents to the local police
- Inform Divisional Ethics Compliance Lead or General Counsel within 48 hours of the signs being spotted or raised so that appropriate measures to support the case can be taken.
- Cooperate with the authorities
- Actively implement corrective actions (where necessary)
- Work with Divisional Communications Lead to manage any media or external communication about the incident to ensure Serco is not viewed as complicit.

3.3 Divisional Ethics Compliance Lead

- Support any case of potential modern slavery that has been reported



- Liaise with any third party where they are involved
- Review all cases and ensure any process improvements are identified and adopted to stop future incidents

4 Definitions

Term Used	Definition
Modern Slavery	<p>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.</p> <p>Modern slavery is an umbrella term, encompassing human trafficking, slavery, servitude and forced labour. Someone is in slavery if they are:</p> <ul style="list-style-type: none"> • 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	<p>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.</p>
Servitude	<p>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.</p>
Forced Work	<p>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'.</p>

5 Support & Feedback

Further help/support with implementing this operating procedure can be provided by Group and Divisional Ethics Compliance Leads.

6 References

The following documents should be referred to when implementing this operating procedure:

Reference	Location	Title
SMS-GS-BC5	MySerco > SMS > Business Conduct and Ethics > Standards	Human Rights Group Standard

FBCE18 - Modern Slavery
Response and
Remediation Plan and
Guidance

MySerco > SMS > Business
Conduct and Ethics > Forms,
templates and guidance

Modern Slavery Response and
Remediation Plan and Guidance

Annex A – Key signs 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