



Modern Slavery & Human Trafficking Policy

Policy Review

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Approval date: 04/02/2025
Signature:
Next review date: 04/02/2026
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Version: 1

Introduction

TradeTechs Northern Ltd is committed to upholding the highest ethical standards and respecting human rights in all its operations. We recognise that modern slavery and human trafficking are abhorrent crimes that violate fundamental human rights and can take many forms, including forced labour, servitude, and exploitation. This policy sets out our commitment to preventing modern slavery and human trafficking within our organisation and supply chains, and outlines the measures we will take to identify, address, and mitigate any risks. We believe that everyone has a responsibility to combat modern slavery and human trafficking, and we are dedicated to playing our part.

Scope

This policy applies to all employees, workers, volunteers, students, contractors, suppliers, and any other individuals or organisations acting on behalf of TradeTechs Northern Ltd. It covers all aspects of our operations, including recruitment, procurement, training, and service delivery.

Compliance and Links to Key Legislation

This policy is underpinned by the following key legislation:

- **Modern Slavery Act 2015:** This Act consolidates various offences relating to trafficking and slavery and creates new offences relating to modern slavery. It also places a duty on certain large businesses to publish an annual slavery and human trafficking statement. While TradeTechs Northern Ltd may not fall



under the reporting threshold of the Modern Slavery Act 2015 at this time, we are committed to adhering to its principles and best practices. We will review our position annually in light of any changes to the legislation or our organisational size.

- **Equality Act 2010:** This Act protects individuals from discrimination on various grounds, including race, religion or belief, and disability. Modern slavery and human trafficking disproportionately affect vulnerable groups, and our commitment to equality and non-discrimination is crucial in preventing exploitation. We recognise that intersectional discrimination can exacerbate the risks of modern slavery.
- **Human Rights Act 1998:** This Act incorporates the European Convention on Human Rights into UK law. Modern slavery and human trafficking are clear violations of several articles of the Convention, including the prohibition of slavery and forced labour, and the right to liberty and security.

We are committed to complying with all relevant legislation and will regularly review this policy to ensure it remains effective and up to date.

Training

All employees, workers, and volunteers will receive appropriate training on modern slavery and human trafficking. This training will cover:

- The different forms of modern slavery and human trafficking.
- The signs and indicators of exploitation.
- Our policy and procedures for reporting concerns, including whistleblowing.
- The support available to victims of modern slavery.

The training will be delivered face to face or online and will be refreshed annually. We will maintain records of all training provided.

Monitoring and Evaluation

We will monitor the effectiveness of this policy through the following measures:

- Regular review of our recruitment and procurement processes.
- Monitoring staff awareness and understanding of modern slavery issues.
- Tracking reports of potential cases of modern slavery.



- Reviewing our supply chains for potential risks.

We will evaluate this policy annually and make any necessary changes to ensure its continued effectiveness. This evaluation will include consultation with relevant stakeholders.

Reporting Concerns

We encourage all employees, workers, volunteers, students, and others to report any concerns they may have about modern slavery or human trafficking. Reports can be made to the designated safeguarding officer. We will treat all reports seriously and will investigate them promptly and confidentially. We will not tolerate any retaliation against anyone who makes a report in good faith.

Related Policies/ Documents

- **Safeguarding Policy**
- **Equality and Diversity Policy**
- **Whistleblowing**
- **Sexual Exploitation Policy**

Conclusion

TradeTechs Northern Ltd is committed to playing its part in the fight against modern slavery and human trafficking. We believe that this policy, combined with our training and monitoring processes, will help us to identify and mitigate any risks within our organisation and supply chains. We will continue to review and improve our approach to this important issue and will work with our stakeholders to ensure that our commitment to human rights is unwavering.

Appendix 1

Glossary of terms	
Modern Slavery	Modern Slavery is the term used within the UK and is defined within the Modern Slavery Act 2015. These crimes include holding a person in a position of slavery, servitude forced or compulsory labour or facilitating their travel with the intention of exploiting them soon after.
Human Trafficking	Human trafficking is modern-day slavery and involves the use of force, fraud, or coercion to obtain some type of labour or commercial sex act. Traffickers use force, fraud, or

	coercion to lure their victims and force them into labour or commercial sexual exploitation.
Safeguarding	Safeguarding adults includes protecting their rights to live in safety, free from abuse and neglect. People and organisations working together to prevent the risk of abuse or neglect, and to stop them from happening.
Whistleblowing	Whistleblowing occurs when an individual raises concerns, usually to their employer or a regulator, about a workplace danger or illegality that affects others. The Public Interest Disclosure Act 1998 is the key piece of UK legislation protecting individuals who 'blow the whistle' in the public interest.
Supply chain	A supply chain is the entire process of making and selling commercial goods, including every stage from the supply of materials and the manufacture of the goods through to their distribution and sale.