



# **Modern Slavery Policy**

August 2024

Version 3

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## Policy Commitment

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GSS has a zero-tolerance approach to all forms of modern slavery, and we are committed to acting legally, ethically and with integrity in all our business dealings and relationships. We seek to adopt and develop a proactive approach to prevent and remediate the risks of modern slavery, forced and debt-bonded labour, human trafficking and hidden exploitation within our workforce.

We expect all who have, or seek to have, a business relationship with GSS to familiarise themselves with this policy and to act at all times in a way that is consistent with its values.

This policy will be used to underpin and inform any statement on Slavery and Human Trafficking that we or our Parent Company RTC Group PLC produce further to the transparency in supply chain requirements of Section 54 of the Modern Slavery Act (MSA) 2015.

## Scope of this Policy

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This policy applies to all persons working for or on behalf of GSS in any capacity, including employees, directors, workers, contractors, consultants and GSS's supply chain.

This policy will be reviewed by the Operations Director at least once a year.

This policy does not give contractual rights to individuals and we reserve the right to alter any of its terms at any time, although we will notify applicable parties of any changes. Any updated versions will be made available to all employees and notified to persons covered by the scope of the policy.

## What do we mean by Modern Slavery?

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Modern slavery can take many forms. It is a complex and multi-faceted crime and therefore it is important to understand what we mean by modern slavery. Detailed below are important definitions that everyone should understand:

**Modern slavery** is a broad term used to encompass offences that involve one person depriving another person of their liberty, to exploit them for personal or commercial gain.

**Forced labour** is all work or service that is exacted from any person under the menace of any penalty and for which the said person has not offered themselves voluntarily.

**Debt-bonded labour** is where a person's labour is demanded as a means of repayment for a loan or service.

**Human trafficking** is the recruitment and transportation of persons by threat, force, coercion or other abuse of power or vulnerability to achieve the consent of a person having control over another person for the purpose of exploitation.

**Hidden labour exploitation** is action up to and including modern slavery which involves the exploitation of workers and job applicants by internal or external individuals without the sanction or explicit knowledge of the employer or labour provider.

Other forms of slavery, which we will not tolerate, but are not specifically referenced in the MSA 2015 include, but are not limited to:

**Child labour** involves the employment of children that is exploitative, or is likely to be hazardous to, or interfere with, a child's education, health (including mental health), physical wellbeing or social development.

All forms of modern slavery have in common the deprivation of a person's liberty by another in order to exploit them for commercial or personal gain and amount to a violation of an individual's fundamental human rights.

Tackling modern slavery requires us all to play a part and remain vigilant to the risk in all aspects of our business and business relationships.

## Indicators of Forced Labour

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The International Labour Organisation's (ILO) 11 indicators of forced labour are intended to help us to identify persons who are possibly trapped in a forced labour situation, and who may require urgent assistance. The indicators represent the most common signs or "clues" that point to the possible existence of a forced labour case.

**Abuse of vulnerability** is when an employer takes advantage of a worker's vulnerable position, such as those with a lack of knowledge of the local language or

laws, those with limited livelihood options, those belong to a minority religious or ethnic group or those who have a disability or have other characteristics that set them apart from the majority population.

**Deception** is when individuals are recruited with promises of decent, well-paid jobs. But once they begin working, the promised conditions of work do not materialize, and workers find themselves trapped in abusive conditions without the ability to escape.

**Restriction of movement** is when workers are not free to enter and exit the work premises, without being subject to certain restrictions. This could include workers having their movements controlled inside the workplace, through the use of surveillance cameras or guards, and outside the workplace by agents of their employer who accompany them when they leave the site.

**Isolation** is when victims of forced labour are isolated in remote locations, denied contact with the outside world. This could include being kept behind closed doors or having their mobile phones or other means of communication confiscated.

**Physical and sexual violence** is when workers, their family members and close associates are subjected to actual physical or sexual harm. This can include being forced to take drugs or alcohol, undertake inappropriate tasks that were not part of the initial agreement, or kidnapping and being held captive.

**Intimidation and threats** are used when workers complain about their conditions or wish to quit their jobs such as threats of physical violence, denunciation to the immigration authorities, loss of wages or access to housing, further worsening of working conditions or withdrawal of “privileges” such as the right to leave the workplace.

**Retention of identity documents** is when an employer retains identity documents or other valuable personal possessions, and workers are unable to access these items on demand or feel that they cannot leave the job without risking their loss.

**Withholding of wages** is when workers may be obliged to remain with an abusive employer whilst waiting for the wages that are owed to them. Wages are systematically and deliberately withheld as a means to compel the worker to remain and deny them the opportunity to change employer.

**Debt bondage** is when workers are forced into labour to pay off an incurred or sometimes even inherited debt. The debt can arise from wage advances or loans to cover recruitment or transport costs or from daily living or emergency expenses, such as medical costs.

**Abusive working and living conditions** describe when workers are forced to perform labour under conditions that are degrading (humiliating or dirty) or hazardous (difficult or dangerous without adequate protective gear), and in severe breach of labour law. Forced labourers may also be subjected to substandard living conditions, made to live in overcrowded and unhealthy conditions without any privacy.

**Excessive overtime** is when workers are forced to work excessive hours or days beyond the limits prescribed by national law. They can be denied breaks and days off, having to take over the shifts and working hours of colleagues who are absent, or by being on call 24 hours a day, 7 days a week.

## **How we seek to embed our Modern Slavery Policy in practice**

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To underpin our policy commitment, we have introduced the following measures:

- We have raised awareness of modern slavery with our employees, through our induction training, and modern slavery statement.
- We provide annual Modern Slavery refresher training for all employees.
- We have introduced an Ethical Recruitment and Workforce Management Charter, which details our commitment to recruiting responsibly and the high ethical standards we expect from our clients, workers, employees, suppliers and ourselves
- We are committed to the Dhaka Principles for Migration with Dignity. Details of the Dhaka Principles are available at [www.dhaka-principles.org](http://www.dhaka-principles.org)
- We have introduced Compliant Recruitment Principles which all employees involved in the recruitment or deployment of temporary workers are required to sign up to

- All high-risk suppliers, that are engaged in the recruitment or deployment of temporary workers, are required to sign up to our CTIP's (Combatting Trafficking in Persons) and Human Rights Policies and agree to abide by the Dhaka Principles. All high-risk suppliers must also commit to our ethical principles including a no-fee recruitment commitment.
- We are continuing to comply with the requirements for CTIP's (Combatting Trafficking in Persons). We ensure all employees annually undertake refresher training on CTIP's (Combatting Trafficking in Persons)
- Working alongside our parent company RTC Group Plc, we have set up a Modern Slavery Steering Group to review the actions we have taken to date and identify and implement further best practice and introduced internal KPI's to monitor our progress in this area. The Modern Slavery Steering Group members undertake additional training in relation to Modern Slavery issues.
- We have appointed volunteers from within the Group to become Modern Slavery Champions to further raise awareness of modern slavery amongst peers and to promote the different ways workers can report concerns or suspicions of exploitation and help to identify best practice.

In addition we:

- Have carried out a risk assessment to determine which parts of our own business and which of our supply chains are most at risk from modern slavery, and introduced additional measures to reduce this risk.
- Have undertaken a Supplier Review with those suppliers deemed as highest risk, part of the review involved assessing their Modern Slavery policies, practices and procedures.
- Have updated our supplier questionnaire to include specific questions relating to Modern Slavery.
- Continue to work to robust placement processes which include compliance checks and identity checks, these processes are reviewed in line with changes in legislation and best practice.
- Have reviewed our contractual documentation with suppliers in relation to

specific prohibition against slavery or servitude, the use of forced, compulsory or trafficked labour and the use of child labour in line with this policy.

- Continue to ask all candidates to confirm their understanding that our services are free to them, and that they haven't paid any fees to GSS or anyone else in the Supply Chain. They are also given our direct contact details if they have any concerns in relation to this.
- Continue to use our Contractor Handbook to ensure all contractors are aware of all relevant policies, including Anti-Bribery and Corruption, Modern Slavery and Ethical Recruitment and Workforce Management, along with a questionnaire to ascertain if the contractor has been dealt with in accordance with our policies.
- Ensure our job adverts detail that no fees will be requested by ourselves or sub-agents.
- Have made it clear on our website that GSS offers free recruitment services and no fees will be charged.
- Continue to comply with Combatting Trafficking in Persons (CTIP's) requirements.

## **Responsibility for this policy**

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The Operations Director has overall responsibility for this policy and in ensuring that the company complies with all its legal and ethical obligations.

The HR department will have the primary day-to-day responsibility for the implementation of this policy, monitoring its use and ensuring that the appropriate processes and control systems are in place and amended as appropriate, to ensure it can operate effectively.

All line managers are responsible for ensuring that those reporting directly to them comply with the provisions of this policy in the day-to-day performance of their roles.

## **Communication and employee awareness training**

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The HR Department will ensure that all employees receive adequate training on this



policy and any supporting processes applicable to their role. Such training forms part of the Company's induction processes, which is refreshed annually.

In addition, staff will receive training on the broader issues of modern slavery so as to assist them in appreciating the extent of the problem of modern slavery and help identify the individuals/areas of the business that may be at risk from practices of modern slavery.

Employees have received training on Modern Slavery and Combatting Trafficking in Persons so as to assist them in appreciating the extent of the problem of modern slavery and help identify the individuals/areas of the business that may be at risk from practices of modern slavery. Further training needs will be identified by the Modern Slavery Steering Group.

## **How to raise a concern**

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You can raise any concern by emailing [enquiries@ata-gss.com](mailto:enquiries@ata-gss.com).

Alternatively, you can discuss concerns with your manager/point of contact or the group HR department.

## **Breaches of this Policy**

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Any breaches of this policy will be taken seriously and dealt with on a case by case basis. The breach of this policy by an employee of GSS may lead to disciplinary action being taken. Serious breaches will be regarded as gross misconduct and may lead to immediate dismissal in accordance with our disciplinary procedure. The breach of this policy by a contractor of GSS may lead to immediate termination of contract.

GSS has a zero-tolerance approach to instances of modern slavery within its supply chain and expect suppliers and clients to uphold the same ethical standards. We will work proactively with our suppliers to eradicate modern slavery within our supply chains.

Everybody to whom this policy applies will be expected to co-operate to the fullest extent possible in any investigation into suspected breaches of the policy or any related processes or procedures.

## Document Control

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V	DATE	AMENDMENTS	APPROVED BY	SIGNATURE
1	27.07.2022	New Policy	Anthony Clarke	
2	28.07.2023	Additional actions added based on the last 12 months progress	Anthony Clarke	
3	06.08.2024	Additional actions added based on the last 12 months progress. Minor grammatical edits.	Anthony Clarke	

## Acknowledgement

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I confirm that I have read and understood the contents of this policy.

Name: \_\_\_\_\_

Position in Company: \_\_\_\_\_

Signed: \_\_\_\_\_

Dated: \_\_\_\_\_