

# Modern Slavery and Human Trafficking Statement

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## 1. Introduction

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This statement sets out Fedcap Employment actions to understand all potential modern slavery risks related to its business and to ensure steps are maintained to prevent slavery and human trafficking. This statement relates to actions and activities during the calendar year ending 31 December 2020.

Fedcap Employment has a zero-tolerance approach to modern slavery and human trafficking and is fully committed to preventing slavery and human trafficking in its corporate activities and ensuring there is transparency across the business and supply chains.

As part of our initiative to identify and mitigate risk (including in relation to that of human trafficking and slavery) we operate a range of policies which serve to address the requirements of the Modern Slavery Act 2015.

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## 2. Our policies

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Our policies reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective due diligence and contractual compliance. These include:

### ***Code of Conduct***

Our code makes clear to employees the actions and behavior expected of them when representing the organisation. We strive to maintain the highest standards of employee conduct and ethical behavior when operating and managing our supply chain.

### ***Whistleblowing Policy***

Fedcap Employment encourages all its workers, customers and business partners to report any concerns related to direct activities, or the supply chains of the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can email [whistleblowing@fedcapemployment.org](mailto:whistleblowing@fedcapemployment.org)

### ***Recruitment Policy***

We use only specified, reputable employment agencies to source labour and always verify the practices of any new agency before accepting workers from that agency.

### ***Safeguarding Policy***

Our Safeguarding policy sets out the legislative requirements to provide a duty of care, promote positive well-being and provide a clear process for escalating concerns to protect the welfare of individuals.

### ***Equality, Diversity and Inclusion Policy***

Our Equality, Diversity and Inclusion policy is in place to ensure that we treat people fairly and with respect. Fedcap Employment is committed to being an Employer of Choice and we strive to create and implement our Equality, Diversity and Inclusion Strategy.

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## 3. Our supply chains and supplier adherence to our values

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We expect the highest standards of conduct and probity throughout our supply chain, requiring all of our people to act with integrity and honesty. Our procurement processes include standard

enquiries about modern slavery and trafficking and we examine our supply chain using our dedicated quality assurance functions including audit, supply chain management, legal and risk.

Fedcap Employment will continue to work with suppliers to ensure that they meet these standards and comply with the requirements of the Modern Slavery Act.

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#### 4. What we do

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As part of our commitment to preventing modern slavery and human trafficking we:

1. Introduced online training on the Modern Slavery Act, which was made compulsory in 2017/2018; Fedcap employees are required to complete training on the act, including how to identify and escalate any concerns.
2. Continue to review and develop the policies, processes and controls in place to support our commitment to mitigate risks of modern slavery across our organisation.
3. Will develop and update this statement annually to meet the requirements of the Modern Slavery Act.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Slavery and Human Trafficking statement of the financial year ending 2022.

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#### 5. Approval

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This statement has been approved by Human Resources, who will review and update it annually.

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#### Document control

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This policy will be reviewed at least annually to respond to any changes.

This policy is owned by Human Resources.

Version	Date reviewed / edited	No change / Change details	Author / Editor / Reviewer	Approved by (if required)	Approval date (if required)	Next review date
1.0	01/03/2019	New Policy	Gemma Dale	HR	01/03/2019	March 2020
1.1	20/03/2020	No change – annual review	Maureen Fowler	HR	20/03/2020	March 2021
1.2	15/01/2021	No change - annual review	Maureen Fowler	HR	15/01/2021	March 2022
1.3	20/03/2022	No change – annual review	Maureen McCann	HR	20/03/2022	March 2023