



# Anti-Slavery Policy

## Introduction

SLI has a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships.

Within the Republic of Ireland, the legislation overseeing any acts of Modern Slavery and Human trafficking is the Criminal Law (Human Trafficking) Act 2008, as amended by the Criminal Law (Human Trafficking) (Amendment) Act 2013 and also the EU Charter of fundamental rights, where Article 5, states that no one will be held in slavery or servitude, Article 5.2 asserts that no one will be required to perform forced or compulsory labour and Article 5.3 states that trafficking in human beings is prohibited. This policy applies to all staff, volunteers, clients, and suppliers of SLI. All staff, volunteers and clients have a responsibility in helping SLI prevent and address this issue.

In Ireland, if you are a victim of modern slavery or human trafficking, or you spot a suspected case, you can contact the **Migrant Rights Centre Ireland**, on 01 889 7570, email [info@mrci.ie](mailto:info@mrci.ie), or visit their **drop-in centre** in 28, North Great George's Street, Dublin 1. The Department of Justice and the Organisation for Migration (the UN Migration Agency) are currently cooperating on a public awareness initiative on Human Trafficking called the Blue Blindfold Campaign. You can report your human trafficking concerns to the Blue Blindfold campaign by phoning 1800 666111 or 999/112 or email [blueblindfold@garda.ie](mailto:blueblindfold@garda.ie).

This policy applies to all staff, volunteers, and clients of SLI.

## Definition of Slavery

Modern slavery is a crime and a violation of fundamental human rights. Modern slavery is an international crime affecting an estimated 40.3 million individuals around the world. This global issue transcends age, gender, and ethnicities; it is estimated that 1 in 4 victims of modern slavery are children and that three quarters are women and girls.

It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. "Modern slavery" refers to the offences of human trafficking, slavery, servitude, and forced or compulsory labour. This can then be considered under five headings:

- the sexual exploitation of adults.
- the trafficking of adults into conditions of labour exploitation.
- the trafficking of adults into conditions of criminal exploitation.
- the trafficking of minors into conditions of sexual, criminal or labour exploitation.
- other forms of exploitation.

"Human trafficking" is a global crime that trades in people and exploits them for profit. "Human trafficking" is defined in the UN Trafficking in Persons Protocol, which supplements the United Nations Convention against Transnational Organized Crime, as "the recruitment, transport, transfer, harbouring or receipt of a person by such means as threat or use of force or other forms of coercion, abduction, fraud or deception for the purpose of exploitation". Although human trafficking often involves an international cross-border element, it is also possible to be a victim of modern slavery within your own country. There are several broad categories of exploitation linked to human trafficking, including sexual exploitation, forced labour, domestic servitude, organ harvesting, child related crimes, forced marriage and illegal adoption.



## Prevention Strategies

Guidance on this policy forms part of the induction process for all individuals who work for and with us and will be provided otherwise as necessary. Managers and supervisors should also ensure that workers understand this Policy and consequences of non-compliance.

As part of our initiative to identify, mitigate and prevent slavery we:

- Conduct all our business in an honest and ethical manner and comply with all applicable legislation.
- Drive best practice in tackling modern slavery and human trafficking.
- Protect whistle blowers.
- Conduct due diligence with our suppliers and providers to ensure no human trafficking occurs within their chains.
- Request that our providers provide us with a statement of intent on modern slavery and human trafficking where necessary.
- Robust recruitment processes in line with Republic of Ireland employment law, including "right to work" document checks, contracts of employment, and checks to ensure all employees are above minimum working age.
- Market-related pay and reward.

Managers and supervisors must also treat all grievances raised seriously and in a timely manner.

### Spotting Slavery

- **Physical Appearance:** Victims may show signs of physical or psychological abuse, look malnourished or unkempt, or appear withdrawn.
- **Isolation:** Victims may rarely be allowed to travel on their own, seem under control, influence of others, rarely interact or appear unfamiliar with their neighbourhood or where they work.
- **Poor Living Conditions:** Victims may be living in dirty cramped or overcrowded accommodation and /or living and working at the same address.
- **Few or No Personal Effects:** Victims may have no identification documents, have few personal possessions and always wear the same clothes day in day out. What clothes they do wear may not be suitable for their work.
- **Restricted Freedom of Movement:** Victims have little opportunity to move freely and may have had their travel documents retained, e.g. passports.
- **Unusual Travel Times:** They may be dropped off/collected for work on a regular basis either very early or late at night.
- **Reluctant to Seek Help:** Victims may avoid eye contact, appear frightened or hesitant to talk to strangers and fear law enforcers for many reasons, such as not knowing who to trust or where to get help, fear of deportation, fear of violence to them or their family.

### Compliance

- The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains or any supplier tier at the earliest possible stage.
- If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chain constitute any of the various forms of modern slavery, you should raise it with your manager.



- »» We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting, in good faith, their suspicion that modern slavery of whatever form is or may be taking place in any part of our business or in any of our suppliers. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your manager immediately. If the matter is not remedied, you should raise it formally.

## Procedure


1. You must notify your manager as soon as possible if you believe or suspect that a breach of this policy has occurred or may occur in the future.
2. Your manager will take notes and detailed information of the suspicion and will report to the relevant persons and authorities.
3. Complaints will be taken seriously and will be dealt with sympathetically and in a confidential manner (except where the Company deems it is necessary to disclose information in order to properly deal with the issue).
4. Investigation into the report will commence. There will be continued communication with parties involved. Information will be passed on to the relevant authorities capable of handling issues relating to slavery.

## Breaches

We will terminate our relationship with individuals and organisations working for us or on our behalf (including suppliers) if they breach this policy.

Any employee, volunteer or service provider who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

The Anti-Slavery Policy will be reviewed in June 2025, or as soon as practicable after there has been a material change in any matter to which the statement refers.

Signed:  (John Hawkes, SLI Board Chair)

This policy was approved by SLI's Management Committee, June 2023.