



MODERN SLAVERY & HUMAN TRAFFICKING POLICY

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Modern Slavery & Human Trafficking Policy

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1. POLICY STATEMENT

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a serious crime and a violation of fundamental human rights.

Prime Life is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking. We believe that we conduct our business fairly, ethically and with respect to fundamental human rights.

As an equal opportunity's employer, we're committed to creating and ensuring a non-discriminatory and respectful working environment for our staff. We want all our staff to feel confident that they can expose wrongdoing without any risk to themselves. Our recruitment and selection processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion.

We do not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour. We take a zero tolerance to modern slavery and human trafficking.

Prime Life are required to publish an annual statement setting out its steps to prevent modern slavery. This statement will be published in the following locations:

- Prime Life Website www.prime-life.co.uk
- Employee Handbook
- Prime Life Learning Hub
- Modern Slavery Statement Registry
- Annual Audited Accounts

2. SCOPE

This Policy applies to all employees of Prime Life plus any persons working on our behalf in any capacity including agency workers, contractors, external consultants, training providers, students on placement, volunteers, suppliers and any other person associated with our business.

3. PURPOSE OF THE POLICY

The purpose of this policy is to:

- Set out the principles we work to, including those working for us, in upholding our position on modern slavery and human trafficking.
- Provide information and guidance to those working for us on how to recognise and deal with modern slavery issues should they arise.

4. RESPONSIBILITIES & GOVERNANCE

The Chief Operating Officer & Chief Executive Officer maintain overall responsibility for the oversight of the control of modern slavery and human trafficking within the organisation.

This is managed through a range of policies and procedures that are implemented and monitored by the Directors and Heads of Service.

5. PREVENTING MODERN SLAVERY WITHIN PRIME LIFE

Prime Life have a zero-tolerance approach to modern slavery within our organisation and supply chains.

The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf.

Everyone employed by Prime Life or working on our behalf must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.

Prime Life are committed to engaging with our stakeholders and suppliers to address the issue of modern slavery in our contracts.

Prime Life will take disciplinary action for any employees found to be in breach of this policy.

Prime Life reserve the right to cancel any contracts with suppliers who are found to breach this policy.

6. OUR EMPLOYEES

Prime Life will conduct right to work checks on all employees as part of the recruitment and selection process.

Prime Life provides each employee with a written contract of employment.

Prime Life pays its employees in accordance with UK law.

Prime Life complies with its legal obligations to ensure the health and safety of its employees including contracts of employment, working hours, rest breaks, working conditions and holiday entitlements.

Prime Life will not withhold passports or other identity documents, contracts, payslips, bank or health information from its employees.

Prime Life will support employees to find out about their rights as workers in the UK as well as signposting advice services.

Prime Life will contact the police by calling 999 if any employee or person working for us is identified as at immediate risk of harm with regard to modern slavery or human trafficking.

Prime Life will contact the Local Authority Safeguarding Team if an employee over 18 is suspected to be subject to modern slavery or human trafficking.

Prime Life will contact the Local Authority Safeguarding Team if an employee under 18 is suspected to be subject to modern slavery or human trafficking.

7. OUR SUPPLY CHAIN

Our supply chains are varied but controlled and we procure goods and services from a restricted range of UK and overseas suppliers, through purchasing frameworks.

If you supply Prime Life with goods or services directly or indirectly through a purchasing organisation, we expect you to comply with your legal obligations in relation to modern slavery. We expect you to be committed to ensuring that there is no slavery, forced labour, servitude, child labour or human trafficking taking place in your business or any of your supply chains.

If suppliers breach this policy or are found to have slavery or human trafficking within their business or their supply chain, Prime Life reserves the right to terminate our contract with you and report to the Police as appropriate.

8. EMBEDDING THE PRINCIPLES

Prime Life will embed the principles through:

- Provision of awareness training for staff on the Modern Slavery Act 2015
- Providing information for staff on the appropriate action to take if they suspect a case of modern slavery or human trafficking.
- Ensure staff involved in procurement activity are aware of and follow modern slavery procurement guidance on GOV.UK.
- Ensuring that Prime Life's procurement strategies and contract terms and conditions include references to modern slavery and human trafficking.
- Ensuring that Prime Life's recruitment and selection processes and policy contains information about modern slavery and human trafficking.
- Continuing to take action to embed a zero-tolerance policy towards modern slavery.

9. RESPONSIBILITIES & REPORTING

All employees, people working for and on behalf of Prime Life or supplying goods or services to Prime Life should have access to and read this policy.

Anyone who knows of activity or suspects activity that would breach this policy has a requirement to report this.

Employees of Prime Life should report to their line Manager who should escalate the concern through their line management finally to the Chief Executive Officer. Employees who do not feel able to report through these mechanisms may report directly through the Whistleblowing Alert Line **0333 313 1817**.

Non-employees of Prime Life should report directly to the Chief Executive Officer via the info line for Prime Life info@prime-life.co.uk or via the Whistleblowing Alert Line **0333 313 1817**.

10. MONITORING & REVIEW

This policy will be monitored and reviewed on an annual basis or sooner if legislation changes or an incident occurs that requires a more immediate change.

11. FURTHER ADVICE & GUIDANCE

You may wish to obtain further information on this subject via the following websites:

Modern Slavery Act

[Modern Slavery Act 2015](#)

GOV.UK Modern Slavery Collection

[Modern slavery - GOV.UK](#)

GOV.UK Procurement Guidance

[Procurement Policy Note 05/19: Tackling Modern Slavery in Government Supply Chains - GOV.UK](#)