

# Modern Slavery Policy

## 1. Purpose

This Policy sets out the steps taken by Simply to ensure that modern slavery and human trafficking does not take place within our business or supply chain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships.

The statement supports our commitment to ensuring there is transparency in our approach to tackling modern slavery and is made pursuant to s.54 of the Modern Slavery Act 2015.

## 2. What is slavery?

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, 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.

The Modern Slavery Act (MSA) 2015 covers four activities:

|                             |  |
|-----------------------------|--|
| Slavery                     | Exercising powers of ownership over a person   |
| Servitude                   | The obligation to provide services is imposed by the use of coercion   |
| Forced or compulsory labour | Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily |
| Human trafficking           | Arranging or facilitating the travel of another person with a view to their exploitation   |

This policy covers all four activities.

## 3. How is it relevant to us?

Modern slavery is a complex and multi-faceted crime and tackling it requires all of us to play a part. At first glance, you may think this whole subject is irrelevant to us, but it's not.

At a very basic level, of course preventing exploitation and human trafficking, and protecting our workforce and reputation makes good business sense.

The MSA 2015 recognises the important part businesses can and should play in tackling slavery and encourages them to do more.

With this in mind, we need to pay particularly close attention to:

- Our supply chain;
- Any outsourced activities, particularly to jurisdictions that may not have adequate safeguards.
- cleaning and catering suppliers

## 4. Responsibilities

Simply, its managers and colleagues have responsibilities to ensure our fellow workers are safeguarded, treated fairly and with dignity. Everyone must observe this policy and be aware that turning a blind eye is unacceptable and simply not an option.

### The Company (Simply)

Simply Conveyancing commits to:

- Maintaining clear policies and procedures preventing exploitation and human trafficking, and protecting our workforce and reputation;
- Being clear about our approach to recruitment (see Recruitment);
- Check our supply chains (see Supply chains);
- Lead by example by making appropriate checks on all employees, recruitment agencies, suppliers, etc to ensure we know who is working for us;
- Ensure we have in place an open and transparent grievance process for all employees;
- Seek to raise awareness so that our colleagues know what we are doing to promote their welfare;
- Make a clear statement setting out the steps we have taken to ensure slavery and human trafficking is not taking place in our supply chains and to demonstrate that we take our responsibilities to our employees and our clients seriously (see Anti-slavery statement).

### Managers

Our managers will:

- Listen and be approachable to colleagues;
- Respond appropriately if they are told something that might indicate a colleague, or any other person is in an exploitative situation;
- Remain alert to indicators of slavery (see Identifying slavery);
- Raise the awareness of our colleagues, by discussing issues and providing training, so that everyone can spot the signs of trafficking and exploitation and know what to do;
- Use their experience and professional judgement to gauge situations.

### Colleagues

We all have responsibilities under this policy. Whatever your role or level of seniority, you must:

- Keep your eyes and ears open—if you suspect someone (a colleague or someone in our supply chain) is being controlled or forced by someone else to work or provide services, follow our reporting procedure (see Reporting slavery);
- Follow our reporting procedure if a colleague tells you something you think might indicate they are or someone else is being exploited or ill-treated;
- Tell us if you think there is more we can do to prevent people from being exploited.

The prevention, detection and reporting of modern slavery in any part of our business or suppliers is the responsibility of all those working for us.

## 5. The Risks

The principal areas of risk we face, related to slavery and human trafficking, include:

- Supply chains;
- Recruitment through agencies;
- General recruitment.

We manage these risk areas through a number of policies which support to prevent and mitigate the risk of modern slavery existing in the business, and to ensure an open and transparent culture. These include the Whistle-Blowing Policy, Health and Safety Policy, and Grievance Procedure.

## 6. Our Procedures

### Anti-slavery statement

We make a clear statement setting out the steps we have taken to ensure slavery and human trafficking is not taking place in our supply chains and to demonstrate that we take our responsibilities to our employees, people working within our supply chain and our clients seriously.

We make this statement on our website, through this policy and via our Modern Slavery Statement.

### Our statement

Simply Conveyancing, founded in 2000, operates from multiple locations across the UK including a large number of remotely based employees. Working closely with estate agents, Simply Conveyancing prides itself in delivering excellent service to both clients and referrers. In doing so, we work closely with suppliers who provide services from IT to recruitment, to expert legal practitioners.

This policy sets out the key risk areas we face and our approach to avoiding and preventing modern slavery.

### Supply chains

We expect our suppliers and potential suppliers to aim for high ethical standards and to operate in an ethical, legally-compliant and professional manner. We also expect our suppliers to promote similar standards in their own supply chain. We are currently working towards imbedding a process which thoroughly checks our supply chains to ensure the potential for slavery and human trafficking is significantly reduced, and to inform the companies we do business with that we are not prepared to accept any form of exploitation.

We are also working towards checking that all our supplier contracts contain an anti-slavery clause. These clauses, which flows down through all layers of our supply chain, prohibits suppliers and their employees from engaging in slavery or human trafficking. Suppliers are also expected to comply with the Immigration, Asylum and Nationality Act 2006, and must comply and act in accordance with this Policy

We aim to ensure we can account for each step of our supply processes—we know who is providing goods and services to us and we have mechanisms and processes in place to check. In achieving this, we aim to introduce processes such as supplier mapping, risk assessing suppliers

and regularly auditing our suppliers. The requirements and expectations made of our suppliers in relation to the Act will also be clearly communicated and included within any contractual terms issued to them.

## Recruitment

### Using agencies

Our People Team follows firm policy and only uses agreed specified reputable recruitment agencies.

To ensure the potential for slavery and human trafficking is reduced as far as possible, we thoroughly check recruitment agencies before adding them to our list of approved agencies. This includes:

- Conducting background checks
- Investigating reputation
- Ensuring the staff an agency provides have the appropriate paperwork (e.g. work visas)
- Ensuring the agency provides assurances that the appropriate checks have been made on the person they are supplying

We keep agents on the list under regular review, at least every 12 months.

### General Recruitment

- We always ensure all employees have a written contract of employment and that they have not had to pay any direct or indirect fees to obtain work.
- We ensure all employees are provided with a clear contract of employment, which complies with local legislation.
- All applicable laws and industry standards on employee wages, benefits, working hours and minimum age must be adhered to in all countries of operation, without any unauthorised
- We always ensure employees are legally able to work in the UK.
- We check the names and addresses of our employees (a number of people listing the same address may indicate high shared occupancy, often a factor for those being exploited).
- We provide information to all new recruits on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.
- If, through our recruitment process, we suspect someone is being exploited, the People Team will follow our reporting procedures (See Reporting Slavery below).

## 7. Identifying slavery

There is no typical victim and some victims do not understand they have been exploited and are entitled to help and support.

However, the following key signs could indicate that someone may be a slavery or trafficking victim.

- The person is not in possession of their own passport, identification, or travel documents;

- The person is acting as though they are being instructed or coached by someone else;
- They allow others to speak for them when spoken to directly;
- They are dropped off and collected from work.;
- The person is withdrawn, or they appear frightened;
- The person does not seem to be able to contact friends or family freely;
- The person has limited social interaction or contact with people outside their immediate environment.

This list is not exhaustive.

Remember, a person may display a number of the trafficking indicators set out above, but they may not necessarily be a victim of slavery or trafficking. Often you will build up a picture of the person's circumstances which may indicate something is not quite right.

If you have a suspicion, report it.

## 8. Reporting Slavery

Talking to someone about your concerns may stop someone else from being exploited or abused.

Not all victims may want to be helped and there may be instances where reporting a suspected trafficking case puts the potential victim at risk, so it is important that in the absence of an immediate danger, you discuss your concerns first with the People Team before taking any further action ([HR@simplypropertylawyers.co.uk](mailto:HR@simplypropertylawyers.co.uk))

If you think that someone is in immediate danger, dial 999.

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 any form is taking place; whether in our own business, or in any part of our supply chain. If you believe that you have suffered any such treatment, you should inform your Line Manager immediately.

## 9. Training

Simply will train employees to understand the risks and issues surrounding modern slavery and human trafficking, how to identify it and appropriate measures to prevent it. General awareness of our policy and approach is provided to all staff as part of our on boarding procedure. Additional e-learning modules such as 'Eliminating Modern Slavery' are also available on Access for all employees to complete.

This module will be assigned as compulsory to all employees who are involved in managing recruitment and our supply chains.

## **10. Monitoring our procedures**

We will review our Anti-slavery policy regularly, at least annually. We will provide information and/or training on any changes we make.