

MODERN SLAVERY & HUMAN TRAFFICKING POLICY



1. Introduction

- 1.1. The statement sets down Haddon Training Limited's commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business, supply chains or with our learners. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

2. Organisational Structure and Supply Chains

- 2.1. This policy covers the business activities of Haddon Training Ltd which are as follows:
 - 2.1.1. Delivering high quality apprenticeships and work-based vocational qualifications in Horse Care, Racehorse Care, Animal Care and Business.
- 2.2. The Company currently operates in the following countries:
 - 2.2.1. England
 - 2.2.2. Wales

3. Training

- 3.1. To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, the Company requires all staff to complete Safeguarding training with the Designated Safeguarding Leads annually.

4. Policies

- 4.1. The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This policy affirms its intention to act ethically in our business relationships.
- 4.2. The following policies set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:
 - 4.2.1. Whistleblowing policy - the Company encourages all its workers, customers and other business partners to report any concerns related to its direct activities or its supply chains.
 - 4.2.2. Code of Conduct - The Code of Conduct sets down the actions and behaviour expected of employees when representing the Company.
 - 4.2.3. Environmental Policy - The Company's Environmental Policy summarises how we manage our environmental impacts and how we work responsibly with suppliers and local communities.

5. Definitions

- 5.1. Haddon Training considers that modern slavery encompasses:
 - 5.1.1. Human trafficking

- 5.1.2. Forced work, through mental or physical threat
- 5.1.3. Being owned or controlled by an employer through mental or physical abuse or the threat of abuse
- 5.1.4. Being dehumanised, treated as a commodity or being bought or sold as property
- 5.1.5. Being physically constrained or to have restriction placed on freedom of movement.

6. Typology of the types of modern slavery offences in the UK

6.1. Labour exploitation

- 6.1.1. Victims exploited for multiple purposes in isolated environments: Victims who are often highly vulnerable are exploited for labour in multiple ways in isolated rural locations. Victims live on offenders' property in squalid conditions, are subjected to repeated abuse and very rarely paid.
- 6.1.2. Victims work for offenders: Victims are forced to work directly for offenders in business or sites that they own or control (some offenders may be gangmasters). The main method of exploitation is not paying or illegally underpaying victims.
- 6.1.3. Victims work for someone other than offenders: Victims are employed in a legitimate and often low-skilled job, with legal working conditions, by an employer unrelated to the offenders. Most or all the wages are taken by the offenders often through control of the victims' bank accounts.

6.2. Domestic servitude

- 6.2.1. Exploited by partner: Victims are forced to undertake household chores for their partner and often their partner's relatives. If married, the marriage may have been arranged or forced and the servitude often occurs alongside domestic abuse and sexual exploitation.
- 6.2.2. Exploited by relatives: Victims live with and exploited for household chores and childcare by family members, usually extended family. Many victims are children.
- 6.2.3. Exploiters not related to victims: Victims live with offenders who are often strangers. Victims are forced to undertake household chores and are mainly confined to the house.

6.3. Sexual exploitation

- 6.3.1. Child sexual exploitation – group exploitation: Children are sexually exploited by groups of offenders. This is usually for personal gratification, but sometimes the exploitation involves forced sex work in fixed or changing locations and will include characteristics of forced sex work in fixed or changing locations. Offenders frequently transport victims to different locations to abuse them.
- 6.3.2. Child sexual exploitation – single exploiter: Like group exploitation, often involves the grooming of children and transporting them for the purposes of sexual exploitation, although the offending is carried out by one individual.
- 6.3.3. Forced sex work in fixed location: Victims are trafficked and exploited in established locations set up specifically for sex work. This can include bedrooms or rooms in legitimate business premises (e.g. massage parlour).
- 6.3.4. Forced sex work in changing location: Victims are forced into sex work where the location of exploitation frequently changes. Locations include streets, clients'

residence, hotels or 'pop-up' brothels in short-term rented property. Victims are frequently advertised online.

6.3.5. Trafficking for personal gratification: Victims are trafficked to residential sites controlled by offenders and sexually exploited for the offenders' own gratification. Some victims may be confined to the site for a long period of time.

6.4. Criminal exploitation

6.4.1. Forced gang-related criminality: Victims are forced to undertake gang related criminal activities, most related to drug networks. Victims are often children who are forced by gangs to transport drugs and money to and from urban areas to suburban areas and market and coastal towns.

6.4.2. Forced labour in illegal activities: Victims are forced to provide labour to offenders for illegal purposes. The most common example is victims forced to cultivate cannabis in private residences.

6.4.3. Forced acquisitive crime: Victims are forced by offenders to carry out acquisitive crimes such as shoplifting and pickpocketing. Offenders may provide food and accommodation to victims but rarely pay them.

6.4.4. Forced begging: Victims are transported by offenders to locations to beg on the streets for money, which is then taken by the offenders. Victims are often children or vulnerable adults.

6.4.5. Trafficking for forced sham marriage: Traffickers transport EU national victims to the UK and sell these victims to an exploiter in a one-off transaction. Exploiters marry victims to gain immigration advantages and often sexually abuse them.

6.4.6. Financial fraud (including benefit fraud): Victims are exploited financially; most commonly their identity documents are taken and used to claim benefits. This type often occurs alongside other types.

7. High risk learners

7.1. Haddon Training understands it has a slightly elevated risk in respect of learners within the equine industry regarding labour exploitation (see 5.1. above).

7.2. Haddon Training ensures that both employers and learners understand the national minimum wage, employment contracts are checked, and the learner is being paid correctly for the hours and work completed – this includes annual leave allowances.

7.3. Haddon Training also has a robust process for checking the conditions of learners who are living on site with employers to ensure living conditions are met to an acceptable standard.

8. Due diligence processes for slavery and human trafficking

8.1. The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence process includes building long-standing relationships with suppliers and making clear our expectations of business partners, evaluating the modern slavery and human trafficking risks of each new supplier and invoking sanctions against suppliers that fail to improve their performance in line with an action plan provided by us, including the termination of the business relationship.

8.2. Staff should seek guidance from the Designated Safeguarding Lead if they suspect a learner may be a potential victim.

9. Performance Indicators

- 9.1. The Company tracks the completion of all training to measure how effective we are in ensuring slavery and human trafficking is not taking place in any part of our business or supply chains including requiring all staff to have completed Safeguarding training.

This policy has been approved and authorised by:

Name: Keira Doble

Position: HR Lead

Date: 5 February 2021

Signature: 