

Document Control		
Document Ref: PD/MS	Date Issued: 27 th February 2023	Document Classification: Public
Document Title: Modern Slavery Policy	Date of Next Review: See BP23 Compliance Assurance Schedule	
Version: 1.9	Author: K.Smith	

Change Log				
Date:	Change Description:	Proposed:	Actioned:	Approved:
29.04.2018	Policy drafted	K.Smith 29.04.2018	K.Smith 15.05.2018	<i>K.Smith</i>
28/11/18	No change made – policy reviewed and reissued	K.Smith 28/11/18	C.Hughes 28/11/18	<i>K.Smith</i>
04/02/2020	<ul style="list-style-type: none"> - Updated Appendix 1 to clarify that Associates must reconfirm annually - Inserted a new Appendix 2 detailing signs to look out for and useful contact numbers - Inserted reference to Suppliers websites 	H. Lees 16/12/2019	H. Lees 04/02/2020	<i>K.Smith</i>
02/07/2020	Updated Annex 1 to capture additional Declarations	K.Smith 30/06/2020	H.Lees 01/07/2020	<i>K.Smith</i>
25/11/2020	Updated to include information about the 17 types of modern slavery offences in the UK	K.Smith 11/11/2020	H.Lees 25/11/2020	<i>K.Smith</i>
21/04/2021	Minor Drafting Changes to reflect OFI from 2021 Compliance Assurance Review	H.Lees 20/04/2021	H.Lees 21/04/2021	<i>K.Smith</i>
17/12/2021	Minor Drafting Changes to reflect current practice	H.Lees 09/12/2021	H.Lees 17/12/2021	<i>K.Smith</i>
30/03/2022	Minor Drafting Changes to reflect requirements of a Supplier	K.Smith 23/02/2022	H.Lees 29/03/2022	<i>K.Smith</i>
29/09/2022	Minor Drafting Updates to reflect feedback from the Advisory Board	S.Baldry June 2022	H.Lees 13/09/22	<i>K.Smith</i>
27/02/2023	Minor Drafting Updates to change drafting “to prevent any form of modern slavery” to “to minimise the risk of any form of modern slavery”	H.Lees 29/11/22	H.Lees 24/02/23	<i>K.Smith</i>

Purpose

The purpose of this policy is to set out the intentions and key tools that Capella will use to put in place effective systems and controls to minimise the risk of any form of modern slavery taking place within its business and supply chains. It is published in accordance with section 54(2) of the Modern Slavery Act 2015 and the Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015.

Modern slavery encompasses slavery, servitude, human trafficking and forced or child labour. Capella recognises that this is a global and growing issue which can exist in all economies and business sectors. We have a zero-tolerance approach to any form of modern slavery and are committed to acting ethically and with integrity. We aim to put effective systems and controls in place to minimise the risk of any form of modern slavery taking place within our business and supply chains.

Owners

All Capella Associates will be aware of and work within this policy. The Managing Partner will take lead responsibility for deployment of this policy.

Intent

As a Training, Assessment and Business Consultancy provider, Capella sources and contracts with a range of suppliers to deliver client contracts. We will strive to ensure that our services are delivered:

1. Lawfully, through fair and honest dealing
2. By providers and suppliers who only employ adult workers all of whom
 - are not required to make any payments in order to secure employment
 - are not required to hand over their personal identity documents to secure employment
 - are properly paid
 - are treated with respect
3. In sites where there are decent working conditions
4. By providers and suppliers who endeavour to ensure that any negative impact on the environment caused by their operations is minimised and/or offset
5. By providers and suppliers who share our commitment

Tools

Key tools we will use include:

1. Sourcing selection criteria that reflects this policy
2. Completion of a “right to work check” as part of our Associate recruitment process
3. Endeavouring to only use suppliers who have a published Modern Slavery Policy or Statement on their website, or who are willing to complete Capella’s Modern Slavery Declaration (see Appendix 1 of this policy)

4. Providing Employers and Apprentices with information regarding Modern Slavery as part of our online Apprenticeship Support Resources
5. Promote British Values through all Capella training
6. Review this policy and reinforce the principles and signs to look out for to all Associates, Training Delivery Sub-Contractors and Advisory Board Members at least annually (see Appendix 2 and Appendix 3 for further details)
7. Alerting the Managing Partner to any instances and concerns as soon as they are recognised, in order that appropriate action can be taken (see Appendix 2 for further details).

Review and Updates

This policy will be reviewed at least annually.

Appendix 1 – Declaration of commitment to Modern Slavery Policy

General

Capella will endeavour to obtain the below signed Declaration from all providers/suppliers who do not have a Modern Slavery Policy available on their website.

All Associates, Training Delivery Sub-Contractors and Advisory Board Members are required to declare an understanding of the Capella Modern Slavery Policy and commit to adherence to the policy each year.

Declaration of commitment to Modern Slavery Policy

To: Kate Smith, Managing Partner, Capella Associates

I hereby declare that :

- I have read and understood the Modern Slavery Policy of Capella Associates Limited.
- I will work to ensure that I adhere to this policy, ethically and with integrity
- I have not been convicted of any offence involving slavery and human trafficking
 - I have not been, and am not currently, the subject of any investigation, inquiry or enforcement proceedings by any governmental, administrative or regulatory body regarding any offence or alleged offence or in connection with slavery and human trafficking
- The Declarations that I have made above are complete and accurate

Company Name:

Signature :

Name :

Role/position within Capella:

Date :

Please return your completed declaration via email to: admin@capellaassociates.com

Appendix 2 – Signs someone may be a victim of modern slavery and what to do if you believe someone is a victim of modern slavery

Victims of modern slavery may look perfectly normal at first glance however if you take a closer look you may spot one or more of the following signs:

- They appear to be under the control of someone else and are reluctant to interact with others
- They do not have ID on them
- They have few personal belongings, wear the same clothes every day or wear unsuitable clothes for work
- They are not able to move around freely
- They are reluctant to talk to strangers or the authorities
- They appear frightened, withdrawn or show signs of physical and/or psychological abuse
- They are always dropped off and collected for work in the same way, especially at unusual times (ie very early in the morning or late at night)

If a Capella Associate believes that someone may be a victim of modern slavery they should notify the Capella Managing Partner as soon as possible who will log the concern within the Capella Safeguarding and Prevent Concerns and Incidents Log and will take appropriate action, which may include:

- Calling the police on 101, or if a life-threatening emergency is suspected on 999
- Calling Crimestoppers on 0800 555 111
- Reporting any concerns regarding the mistreatment of works to the Gangmasters and Labour Abuse Authority on 0800 432 0804

Further information regarding the types of modern slavery offences encountered in the UK are detailed in Appendix 3 overleaf.

**Appendix 3 – The Typology of 17 types of modern slavery offences in the UK
(extracted from “ A Typology of Modern Slavery Offences in the UK” published
by The Home Office in October 2017)**

A Home Office report, published in October 2017, identified that there are 17 types of modern slavery offences in the UK, which can be classified as follows:

Labour Exploitation

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 and are subject to repeated abuse and are very rarely paid.

2. Victims work for offenders

Victims are forced to work directly for offenders in businesses or sites that they own or control (some offenders may be gangmasters). The main method of exploitation is not paying, or illegally underpaying, victims.

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, wages are taken by offenders often through control of the victims’ bank accounts.

Domestic Servitude

4. 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.

5. Exploited by relatives

Victims live with, and are exploited for household chores and childcare, by family members, usually extended family. Many victims are children.

6. Exploiters not related to victims

Victims live with offenders who are often strangers. Victims are forced to undertake household chores and are mostly confined to the house.

Sexual Exploitation

7. 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 included characteristics of types 9 and 10. Offenders frequently transport victims to different locations to abuse them.

8. Child sexual exploitation – single exploiter

Similar to type 7, often involves grooming of children and transporting them for the purposes of sexual exploitation, although the offending is carried out by one individual.

9. Forced sex work in fixed location

Victims are trafficked and exploited in established locations set up specifically for sex work. This can include brothels or rooms in legitimate business premises (eg massage parlours).

10. Forced sex work in changing location

Victims are forced into sex work where the location of the exploitation frequently changes. Locations include streets, clients' residences, hotels or "pop-up" brothels in short-term rented property. Victims are frequently advertised online.

11. 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.

Criminal Exploitation

12. Forced gang-related criminality

Victims are forced to undertake gang related criminal activities, most commonly 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.

13. 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.

14. Forced acquisitive crime

Victims are forced by offenders to carry out acquisitive crimes such as shoplifting and pick-pocketing. Offenders may provide food and accommodation to victims but rarely pay them.

15. Forced begging

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

16. 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.

17. Financial fraud (including benefit fraud)

Victims are exploited financially; most commonly their identity documents are taken and used to claim benefits. This type of Modern Slavery often occurs alongside other types.