



The Printed Word

...More than just ink on paper

Anti-Modern Slavery Policy

Version 1.0

Anti-Modern Slavery Policy

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Version Control

VERSION	REVIEWER NAME	DATE	NEXT REVIEW	COMMENTS
1.0	Policy Pros	Nov 2023	Nov 2024	First Policy.

Anti-Modern Slavery Policy

Introduction

Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the “Act”). Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person’s liberty by another to exploit them for personal or commercial gain.

This policy is necessary due to the unfortunate fact that modern slavery is a vast, worldwide problem, and the UK is estimated to have tens of thousands of individuals working in slavery or being exploited yearly. In addition, slavery can exist in every stage of the supply chain, from farming to mining and production to transportation.

The consequences of modern slavery are often extremely serious, and for this reason, The Printed Word is morally and ethically committed to helping those affected by modern slavery and combatting such practices as a whole organisation approach.

Despite not being required to produce a modern slavery statement, The Printed Word is committed to preventing slavery violations in its operations, supply chain, and products.

We have produced this policy to state our position: zero tolerance towards slavery and a requirement for our supply chain to comply with our values.

Scope

The areas outlined in this document apply to all business operations of The Printed Word and have been written to establish clear expectations and standards for our colleagues, clients, partners and stakeholders.

Definitions

Public Health England describes Modern Slavery as follows:

“Modern slavery is defined as the recruitment, movement, harbouring or receiving of children, women or men using force, coercion, abuse of vulnerability, deception, or other means for exploitation. It is a crime under the Modern Slavery Act 2015 and includes holding a person in a position of slavery, servitude forced or compulsory labour, or facilitating their travel to exploit them soon after.”

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Roles and Responsibilities

All colleagues (including but not limited to employees, agency workers, and apprentices) are equally responsible for preventing, detecting, and reporting modern slavery.

As a colleague, you must ensure that:

- You read and follow the guidance and training in this policy on detecting and reporting modern slavery. (Appendix A)
- You are not involved in knowingly or unknowingly facilitating modern slavery.

The Printed Word Managing Director, Rob Pryer, is responsible for the following:

- Embedding this policy and its procedures into everyday practice and reviewing and updating it annually or as required.
- Supporting staff in the reporting of suspected modern slavery violations.
- Managing non-compliance or suspected wrongdoing amongst colleagues, suppliers, and/or partners.

Policy

Modern slavery permeates every corner of our economy.

The Printed Word may encounter Modern Slavery through:

- Trafficked or enslaved individuals unknowingly working for or on behalf of The Printed Word.
- Trafficked or enslaved individuals working for or on behalf of our business partners or clients.
- Trafficked or enslaved individuals working in any part of our supply chain.

Training

Training on this policy and the risks our business faces from modern slavery forms part of the induction process for all individuals who work for or on behalf of The Printed Word. Updates will be provided using established methods of communication between the business and its staff.

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Communicating Our Policy

Our zero-tolerance approach to modern slavery must be communicated to all clients, suppliers and business partners at the outset of our business relationship and reinforced as appropriate after that.

Procedures

Responsible Recruitment

The Printed Word has a robust recruitment procedure where all potential colleagues are screened to ensure that:

- They are eligible to work in the UK and have the correct documents to prove the right to both reside and work in the UK.
- They are of legal age to work.

Colleagues are also (where appropriate):

- Paid a fair wage that meets or exceeds the UK legal requirements (employees).
- Paid directly and not paid to another individual on the individual's behalf (employees).
- Given a Contract of Employment or suitable working agreement/contract (all).
- Provided with working conditions that are safe, comfortable, fair, and legal in line with UK health and safety laws (all).

Responsible Goods Supply Chain

The Printed Word will seek to ensure that no slavery has been used in producing the goods we use or supply to others.

The Printed Word will seek to procure all goods from reputable UK-based suppliers and will avoid, wherever possible, procuring from suppliers whose supply chains source materials from areas where modern slavery is prevalent.

Wherever possible, steps will be undertaken to ensure that suppliers have mapped their supply chain and are satisfied that the risks of modern slavery are low.

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At the point of procurement, due diligence will be undertaken to ensure that the supplier has an anti-modern slavery statement or policy (which is publicly available) and has not been prosecuted or otherwise sanctioned for wrongdoing in relation to modern slavery.

Ongoing Monitoring and General Sanctions

The Printed Word, as an ethical business, will undertake regular supplier audit reviews and terminate any contract or agreement with any supplier or partner who is suspected of promoting or aiding or has been convicted of or otherwise sanctioned for:

- Trafficking.
- Child Labour.
- Forced Labour.
- Human Rights Violations.

Monitoring and Reviewing

The Printed Word is committed to ensuring our policies are effective and up-to-date. To do this, we have a process for regularly monitoring and reviewing them.

The Senior Management Team is responsible for this process and will review this policy at least once a year or more frequently if needed due to changes in laws or our practices.

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Appendix A: Guidance and Training on Modern Slavery

Spotting the Signs of Modern Slavery

The charity Anti-Slavery has identified the following as possible signs of an individual being in slavery.

Any individual or individuals who:

- Appear to be under the control of someone else and reluctant to interact with others, particularly the authorities¹.
- Do not have access to their own personal identification.
- Have wages paid to another individual on their behalf.
- Have few personal belongings, wear the same clothes every day or wear unsuitable clothes.
- Live in squalid, overcrowded, or unsafe accommodation.
- May not be able to move around freely.
- Show signs of physical abuse.
- Appear frightened, withdrawn, or show signs of psychological abuse.
- Are always dropped off and collected for work in the same way, especially at unusual times, i.e., early in the morning or late at night.
- Are forced to work long hours or multiple jobs.

Modern Slavery and Exploitation also includes:

- Sexual abuse.
- Harvesting of organs from individuals against their will.
- Child labour and child criminal exploitation.
- Child marriage.

¹ Trafficked or enslaved individuals 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, and fear of violence against them or their family.

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The signs above may not always indicate modern slavery but must not be ignored, and advice from professionals should always be sought.

Raising a Concern

Any staff member who suspects Modern Slavery, Human Trafficking, or Exploitation should:

1. NOT confront the individual, individuals, or organisation directly; and
2. Inform the Managing Director immediately; and
3. Go to a quiet, secure place and use the information below to report your concerns.

Where to Report Concerns

If you are in the UK and suspect someone might be in slavery, you have several options:

- Call the Modern Slavery Helpline (Unseen) and fill out an online form at <https://www.modernslaveryhelpline.org/report>
- Contact Crimestoppers at 0800 555 111 or visit <https://crimestoppers-uk.org/keeping-safe/community-family/modern-slavery>
- Contact the Police on 999 if a crime is or has been committed, life is in danger, or children are at risk.