



Unit 11 Vantage Point  
Howley Park Road  
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# Human Trafficking and Modern Slavery Policy

**Policy Title:** Human Trafficking and Modern Slavery Policy  
**Applies to:** All employees, contractors, agency workers, and visitors  
**Approved by:** Philip Hall  
**Date of Approval:** 20/09/2024  
**Next Review Date:** 20/09/2026

## 1. Purpose

CHP Actuation is committed to preventing modern slavery and human trafficking in all parts of our business and supply chains.

We believe in acting ethically and with integrity, ensuring that all our operations and business relationships are free from any form of exploitation.

This policy outlines our commitment, responsibilities, and procedures for identifying, preventing, and responding to any risk of modern slavery or human trafficking.

## 2. Scope

**This policy applies to:**

- All employees, including temporary, part-time, and agency staff
- Contractors and subcontractors
- Suppliers, service providers, and consultants
- Any other individuals or organisations working on behalf of CHP Actuation Ltd.

## 3. Policy Statement

CHP Actuation has a zero-tolerance approach to modern slavery and human trafficking. We are committed to:

- Acting ethically and with integrity in all business dealings
- Implementing effective systems and controls to prevent modern slavery within our own operations and supply chain
- Ensuring transparency and compliance with the **Modern Slavery Act 2015**
- Encouraging our staff and suppliers to report any concerns relating to potential exploitation or slavery

## 4. Legal Framework

This policy operates under the following UK legislation and guidance:

- **Modern Slavery Act 2015**
- **Human Rights Act 1998**
- **Employment Rights Act 1996**
- **Equality Act 2010**
- **ILO (International Labour Organisation) conventions**



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## 5. Definitions

### Modern Slavery

Modern slavery includes situations where a person's freedom is exploited for personal or commercial gain. It encompasses:

- **Human trafficking:** The recruitment, transportation, transfer, harbouring or receipt of people through force, coercion or deception for the purpose of exploitation.
- **Forced labour:** Work or services exacted from a person under threat or penalty without voluntary consent.
- **Servitude:** A condition where a person is significantly deprived of liberty and forced to work.
- **Child labour:** Exploitation of children through work that deprives them of their childhood or education.

## 6. Responsibilities

### 6.1 Management Responsibilities

- Ensure due diligence procedures are applied when recruiting employees or selecting suppliers.
- Communicate this policy to all relevant stakeholders.
- Investigate and act upon any concerns raised about potential modern slavery.
- Report any suspected instances of slavery to the appropriate authorities.

### 6.2 Employees

- Be alert to signs of exploitation or trafficking within the business or supply chain.
- Report any suspicions or concerns immediately to their line manager.
- Complete any training provided on modern slavery awareness.

### 6.3 Supplier Responsibilities

- Operate in accordance with the principles of this policy.
- Ensure that their own suppliers and subcontractors uphold similar ethical standards.
- Notify CHP Actuation Ltd of any suspected or confirmed cases of slavery or human trafficking.

## 7. Due Diligence and Risk Management

CHP Actuation will undertake due diligence to identify and mitigate the risk of modern slavery by:

- Vetting new suppliers and contractors for ethical labour practices.
- Requiring suppliers to confirm compliance with the **Modern Slavery Act 2015**.
- Monitoring higher-risk supply chains and taking corrective action where concerns arise.
- Reviewing recruitment processes to ensure all employees have the legal right to work in the UK and are employed voluntarily.



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## 8. Reporting Concerns

Employees or third parties who suspect instances of modern slavery or trafficking must report it immediately. Reports can be made:

- Directly to a line manager.
- Anonymously, if preferred.

All reports will be treated seriously, investigated promptly, and handled confidentially.

Where appropriate, CHP Actuation Ltd will report concerns to the **Modern Slavery Helpline (0800 0121 700)** or law enforcement authorities.

## 9. Training and Awareness

- All employees will receive awareness training on recognising and reporting modern slavery.
- Managers and those involved in procurement or recruitment will receive enhanced training.
- This policy will be communicated to all suppliers and contractors.

## 10. Breaches of this Policy

Any employee who breaches this policy may face disciplinary action, up to and including dismissal.

Suppliers or contractors found to be in breach may have their contracts terminated and may be reported to the relevant authorities.

## 11. Continuous Improvement.

CHP Actuation is committed to reviewing and improving its processes to prevent modern slavery and ensure ethical operations.

We will assess our risks and responses annually as part of our compliance review process.

## 12. Review and Approval.

This policy will be reviewed **Annually** or sooner if there are changes to relevant legislation or company operations.

**Name:** Chris Lewis

**Position:** Managing Director

**Date:** 21/12/2024