

Anti-Slavery Policy

Policy Title	Anti-Slavery Policy
Procedure #	Glow062
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What is slavery?

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

- 1 **Slavery** – Exercising powers of ownership over a person
- 2 **Servitude** – The obligation to provide services is imposed by the use of coercion
- 3 **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
- 4 **Human trafficking** – Arranging or facilitating the travel of another person with a view to their exploitation

This policy covers all four activities.

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
- General recruitment



Responsibilities

Glow has 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 will:

- a) maintain clear policies and procedures preventing exploitation and human trafficking, and protecting our workforce and reputation
- b) be clear about our recruitment policy (see Recruitment)
- c) check our supply chains (see Supply chains)
- d) lead by example by making appropriate checks on all employees, recruitment agencies, suppliers, etc to ensure we know who is working for us
- e) ensure we have in place an open and transparent grievance process for all staff
- f) seek to raise awareness so that our colleagues know what we are doing to promote their welfare
- g) make a clear annual statement to demonstrate that we take our responsibilities to our employees and our clients seriously (see Anti-slavery statement)

Managers

Managers will:

- a) listen and be approachable to colleagues
- b) respond appropriately if they are told something that might indicate a colleague, or any other person is in an exploitative situation
- c) remain alert to indicators of slavery (see Identifying slavery)
- d) 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
- e) 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:

- a) 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)
- b) 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
- c) tell us if you think there is more, we can do to prevent people from being exploited



Our procedures

Anti-slavery statement

We make a clear annual 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.

This statement is published on our website, www.theglowstudio.com

Our statement

Glow is a design studio. We specialise in creative design for the STEM, construction, professional services, and leisure & tourism industries. We are committed to preventing acts of modern slavery and human trafficking from occurring and upholding human rights within our business and supply chain and impose the same high standards on our suppliers.

To find out more about the nature of our business, please visit www.theglowstudio.com.

As part of our commitment to combating modern slavery, we have created and will continue to maintain a dedicated policy on anti-slavery to embody our attitude to anti-slavery practices. We also provide dedicated training to our members of staff who operate within those areas of the business where modern slavery may be likely to occur.

In order to continually deliver pragmatic solutions to our industry sectors, we work with a range of suppliers including manufacturers and distributors. As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we seek assurances from new and existing suppliers that they comply with anti-slavery requirements, as well as our own policies.

We enforce a strict code of compliance and do not tolerate slavery and human trafficking within our supply chains. For example, if we find evidence of a failure to comply with our policies, we will immediately seek to terminate our relationship with the relevant supplier. Our procedures are already designed to establish and assess areas of potential risk in our business and supply chains; monitor potential risk areas in our business and supply chains; reduce the risk of slavery and human trafficking occurring in our business and supply chains; and provide adequate protection for whistle-blowers.

This statement is made voluntarily in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Glow's anti-slavery and human trafficking statement for the financial year commencing 01/06/2020 and ending 31/05/2021.

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.

- a) The person is not in possession of their own passport, identification or travel documents.
- b) The person is acting as though they are being instructed or coached by someone else.



- c) They allow others to speak for them when spoken to directly.
- d) They are dropped off and collected from work.
- e) The person is withdrawn, or they appear frightened.
- f) The person does not seem to be able to contact friends or family freely.
- g) 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.

Reporting slavery

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

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

Otherwise, you should discuss your concerns with Lisa Lavis, Managing Director, Glow by emailing lisa@theglowstudio.com or phoning 07712 002777, who will decide a course of action and provide any further advice.

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 Lisa Lavis, Managing Director, Glow, before taking any further action.

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.

