



STRAVICA

**Modern Slavery &
Human Trafficking
Policy**

1. Purpose, Scope and Objectives

1.1 Purpose

To set out Stravica Ltd's zero-tolerance stance on modern slavery and human trafficking, and to establish robust systems to prevent, identify, respond to, and report suspected cases within our business and supply chains across the UK.

1.2 Scope

Applies to:

- All employees, temporary/agency workers, contractors, subcontractors, and consultants engaged by Stravica Ltd.
- All operations (office and site-based: facilities management, cleaning, refurbishment, maintenance, and compliance services).
- All tiers of the supply chain (labour providers, materials, consumables, equipment, logistics, waste, and professional services).

1.3 Objectives

- Promote awareness, early identification, and safe reporting.
- Embed due diligence in recruitment and procurement.
- Provide clear procedures for safeguarding, investigation, and escalation (including NRM referrals by appropriate First Responders).
- Publish, where required, an annual Statement under Section 54 of the Modern Slavery Act 2015.
- Measure and improve effectiveness through KPIs, audits, and leadership review.

2. Legal and Policy Framework

2.1 Legislation (non-exhaustive)

- Modern Slavery Act 2015 (MSA)
- Human Rights Act 1998

- Health and Safety at Work etc. Act 1974
- The Health and Social Care Act 2008 (Regulated Activities) (Amendment) Regulations 2012 (if/where applicable in client settings)
- Employment Rights Act 1996, National Minimum Wage Act 1998, Immigration, Asylum and Nationality Act 2006
- Relevant Safeguarding duties and NRM guidance (England & Wales / Scotland / Northern Ireland).

2.2 Linked Stravica Policies

- Safeguarding Adults; Safeguarding Children & Child Protection
- Whistleblowing / Speaking Up
- Recruitment & Right to Work Checks
- Agency Workers & Labour Providers
- Supplier Code of Conduct
- Health & Safety Policy
- Data Protection (UK GDPR)

3. Definitions

- Modern Slavery: Encompasses slavery, servitude, forced/compulsory labour, and human trafficking for exploitation.
- Human Trafficking: Recruitment/transportation/transfer/harboursing/receipt of persons by means of coercion, deception, or abuse of vulnerability for exploitation.
- Exploitation Types: Labour exploitation, sexual exploitation, criminal exploitation (e.g., county lines), domestic servitude, debt bondage, organ harvesting, financial exploitation.
- National Referral Mechanism (NRM): UK framework for identifying and supporting potential victims.

4. Policy Statement

4.1 Stravica Ltd maintains zero tolerance for modern slavery and trafficking in its business or supply chains. We will:

- Act ethically, with integrity, and maintain effective controls.
- Support victims' safety and welfare through safeguarding routes.
- Investigate concerns and take decisive action (including termination of contracts and reporting to authorities).
- Provide training proportionate to roles and risks.
- Conduct due diligence on suppliers and labour providers.
- Ensure no victimisation for raising concerns in good faith.

4.2 Leadership Commitment

The Managing Director is accountable for resourcing and the effective implementation of this Policy across all Stravica operations and contracts.

5. Roles and Responsibilities

Role	Responsibilities
Managing Director	Approves policy and annual Statement (where applicable); ensures resources; chairs management reviews; authorises escalation to authorities.
Modern Slavery Lead (MSL) (nominated competent person)	Maintains policy, procedures, and training; coordinates investigations; liaises with authorities/clients; tracks KPIs and improvement actions.
HR & Recruitment	Right to Work checks; DBS (role-based); references; monitor recruitment agencies; ensure fair pay and contracts; watch for red flags.
Procurement & Contract Managers	Supplier due diligence, contract clauses, risk assessments, and ongoing monitoring; supply-chain audits; escalation of concerns.
Project/Site Managers	Site inductions (include MS red flags & reporting); verify labour on site; monitor

	agency/subcontractor practices; stop work if concerns.
All Employees/Workers	Complete training; report concerns immediately; cooperate with investigations; uphold company standards.
Suppliers/Contractors	Comply with this Policy, provide transparency, allow audits, cascade standards to their own supply chains.

6. Risk Management and Red Flags

6.1 Risk Areas (typical for Stravica sector)

- Labour provision (cleaning, maintenance, refurbishment trades).
- Out-of-hours / night work, seasonal peaks, rapid mobilisations.
- Accommodation tied to work; transport provided by a controller.
- Low-skilled high-turnover roles; cash-in-hand risks.
- Countries/sectors with higher trafficking prevalence within upstream supply chains (PPE, uniforms, gloves, chemicals).

6.2 Indicators (condensed from your list; full list in Appendix A)

- No access to ID; wages withheld or below minimum wage; debt bondage.
- Workers afraid to speak, appear controlled, or always accompanied.
- Overcrowded tied accommodation; unusual pick-ups at odd hours.
- Signs of abuse; restricted freedom of movement; fear of authorities.

7. Reporting and Escalation (Safeguarding & NRM)

7.1 Immediate Risk

If anyone is at immediate risk of harm: Call 999 (Police). Make the area safe. Preserve evidence where safe to do so.

7.2 Internal Steps

1. Report concern to Line Manager and Modern Slavery Lead immediately.

2. Record facts (time, place, persons, observations). Do not investigate beyond ensuring safety and accurate recording.
3. Safeguarding referral via local authority routes (Adults/Children), as applicable.
4. If the referrer is a First Responder organisation, progress an NRM referral. If not, cooperate with the First Responder.
5. Where the concern involves a supplier/contractor, notify Procurement and the Contract Manager for immediate risk controls (suspend, remove from site, secure alternative labour).

7.3 External Reporting (examples)

- Police: 999 (emergency) / 101 (non-emergency)
- Modern Slavery & Exploitation Helpline: 08000 121 700
- Local Authority Safeguarding: Adults/Children services (per location)

7.4 Whistleblowing

Staff can raise concerns in confidence under Stravica's Whistleblowing / Speaking Up Policy. We prohibit retaliation against anyone who reports in good faith.

8. Safer Recruitment and Labour Controls

- Right to Work checks for all hires; verify identity, bank details, address, and references.
- No recruitment fees charged to workers; pay at/above National Minimum/Living Wage.
- Written terms in a language understood by the worker.
- Direct pay to worker's bank account wherever possible (avoid collective/third-party control).
- Agency/Labour Providers must evidence licensing (if applicable), compliance, and no debt bondage or passport retention.

- Accommodation provided by suppliers must meet standards (privacy, safety, occupancy).
- Site access lists must match verified staff; challenge unknown workers.

9. Procurement, Due Diligence, and Contracting

9.1 Pre-Qualification

- Supplier questionnaire on modern slavery controls, worker protections, pay, accommodation, recruitment practices, and grievance channels.
- Screen for sanctions, adverse media, prior MS investigations/convictions.

9.2 Contract Clauses (minimum)

- Compliance with MSA 2015 & this Policy.
- Warranties on no slavery within business or supply chain; flow-down to sub-suppliers.
- Audit/access rights; immediate termination for breach.
- Obligation to notify Stravica of suspected cases and cooperate with investigations.
- Remedy plan requirements and worker remediation.

9.3 Ongoing Monitoring

- Spot checks: worker interviews, payslips, hours, ID control.
- KPIs: worker turnover spikes, overtime patterns, accident/incident rates, late salary complaints.
- High-risk categories: chemicals/PPE/uniforms, certain geographies—request deeper traceability.

10. Training and Awareness

- Induction: policy overview, red flags, how to report.

- Role-based: HR (Right to Work, agency vetting), Procurement (due diligence), Site Managers (spot signs, safe intervention).
- Annual refresh for relevant roles; toolbox talks for site teams.
- Keep records of all training and attendance.

11. Victim Support and Data Protection

- Prioritise safety and dignity; involve safeguarding/NRM appropriately.
- Signpost to specialist support services via the Modern Slavery Helpline / local agencies.
- Manage personal data lawfully under UK GDPR; restrict access to “need-to-know”.

12. Performance Monitoring, Audit and Review

- KPIs: number of concerns raised, time to respond, supplier audits completed, training completion, corrective actions closed.
- Audit: annual programme covering high-risk suppliers and random checks; escalate findings to leadership.
- Management Review: quarterly; track trends and approve improvement plan.
- Policy Review: at least every 24 months (or earlier if law/guidance changes).

13. Section 54 Modern Slavery Act – Annual Statement (where applicable)

If Stravica Ltd meets the Section 54 thresholds (or elects to publish voluntarily), we will publish an annual Modern Slavery Statement, approved and signed by the Managing Director, on our website home page (or clearly linked), covering:

- Our structure, business, and supply chains
- Policies relating to modern slavery

- Due diligence processes
- Risk assessment and risk management
- Effectiveness (KPIs and outcomes)
- Training on modern slavery for staff and partners

Historic statements will remain accessible for comparison and accountability.

14. Non-Compliance and Sanctions

- Immediate remediation actions; where appropriate, suspend or terminate relationships.
- Report to authorities when indicated and cooperate fully.
- Internally, apply disciplinary processes for policy breaches.

15. Approval and Version Control

Version	Date	Change Summary	Approved By
1.0	[23 rd of October]	Initial Issue	Adeola Olanrewaju

APPENDICES

Appendix A – Identification, Reporting & Investigation Toolkit

A1. Indicators & Red Flags (field checklist)

Physical/behavioural: signs of abuse; fear of authorities; withdrawn; scripted answers; exhaustion.

Control indicators: no ID or bank card; wages withheld; debt to recruiter; someone speaks for them; group transport.

Work indicators: long/unpaid hours; no contract; below minimum wage; no PPE; unsafe conditions.

Living indicators: overcrowded, same address for many workers; tied to

employer; poor hygiene.

Sexual/domestic/criminal exploitation: (include examples as per your list, adapted for sites and offices).

A2. Immediate Actions Flow (text “flowchart”)

1. Is anyone in immediate danger? → Call 999.
2. Ensure safety; separate from controller; first aid if needed.
3. Report internally to Line Manager + Modern Slavery Lead (MSL).
4. Record facts (no leading questions; use the person’s words).
5. Safeguarding referral to Local Authority (Adults/Children).
6. NRM: If a First Responder is involved, support referral; otherwise coordinate with one.
7. Supply-chain: If via contractor/agency, suspend pending review; trigger Procurement due diligence.
8. MSL Investigation: evidence log, witness notes, timeline, root causes, corrective actions.
9. Close & Learn: communicate lessons; update risk assessment and training.

A3. Investigation Pack (templates)

- Incident Report (date/time/location; people involved; description; actions taken).
- Worker Interview (trauma-informed prompts; interpreter if needed; consent).
- Evidence Log (photos, messages, site rosters, transport records).
- Corrective Action Plan (owner, target date, status).
- Authority Contact Record (Police ref, safeguarding ref, NRM status).

A4. Record Retention

- Incident & investigation files: 5 years minimum.

- Whistleblowing records: per company policy & legal guidance.
- Access strictly need-to-know.

Appendix B – Supplier & Labour Provider Due Diligence

B1. Pre-Qualification Questionnaire (extract)

- Corporate details; beneficial ownership; sanctions/adverse media.
- Policies: modern slavery, whistleblowing, recruitment fees, grievance.
- Labour practices: no fees, clear contracts, right-to-work checks, direct pay.
- Pay & hours: compliance with NMW/NLW, overtime controls.
- Accommodation: standards, rent, independence.
- Sub-tier control: mapping, flow-down clauses, audit rights.
- Training & awareness; monitoring & KPIs; prior incidents and remedies.

B2. Contractual Clauses (model)

- Compliance warranty with MSA 2015; maintain documented controls.
- Audit & access rights (documents, sites, worker interviews).
- Notification duty on any suspected case within 24 hours.
- Remediation plan obligations; termination for breach.
- Flow-down to sub-suppliers.

B3. Ongoing Monitoring

- Quarterly attestations from high-risk suppliers.
- Spot checks: payslips, hours, IDs, worker interviews (confidential).
- KPIs reviewed at QBRs; corrective actions tracked to closure.

Appendix C – Training & Competency Matrix

Audience	Content	Frequency	Evidence
All staff	Policy overview, red flags, reporting routes	Induction + 2-year refresh	LMS record / signed attendance
Site managers/supervisors	Spot-signs, safe intervention, interview basics, documentation	Induction + annual toolbox	Toolbox logs
HR/Recruitment	Right-to-Work, agency vetting, fake docs, pay/benefits checks	Induction + 2-year refresh	HR CPD record
Procurement/Contract mgrs	PQ/contract clauses, risk mapping, audit methods	Induction + annual	Supplier audit reports
Executives/Board	Duty of oversight, Section 54 statement content, KPI review	Annual	Board minutes

Appendix D – Risk Assessment & KPI Framework

D1. Risk Assessment (supply chain & operations)

- Context (service, location, labour model).
- Threats (recruitment pressure, third-party transport, tied housing).
- Vulnerabilities (language, literacy, immigration status, cash dependence).
- Controls (contract, audit, worker voice, wage monitoring).
- Residual risk and treatment plan (owner & dates).

D2. KPIs (examples)

- % staff trained (by role)
- concerns raised / # substantiated cases

- Supplier coverage: % high-risk tier-1 audited; % corrective actions closed on time
- Payroll exceptions: duplicate bank accounts; negative deductions; cash payments
- Overtime > legal thresholds (alerts)
- Accommodation non-conformities (per audit)

Appendix E – Modern Slavery Statement (Section 54) – Template

1. Organisation Structure, Business & Supply Chains

Briefly describe Stravica's services, locations, workforce profile, and key supply categories.

2. Policies

List: this Policy; Whistleblowing; Recruitment/Right-to-Work; Supplier Code; Safeguarding; Data Protection.

3. Due Diligence

Summarise PQ screening, risk-based audits, contract clauses, worker interviews, grievance channels.

4. Risk Assessment & Management

Identify higher-risk categories and how they're mitigated (e.g., labour providers, PPE/uniforms, chemicals).

5. Effectiveness & KPIs

Publish metrics (see Appendix D) and year-on-year improvements.

6. Training

Coverage by role; refresh cycles; specialist training.

Approval

"This statement is made under Section 54(1) of the Modern Slavery Act 2015 for the financial year ending [date] and was approved by the Board."

Appendix F – Forms & Templates

1. Modern Slavery Concern Report (internal)
 - Reporter details; date/time/location; description; persons involved; immediate actions; who notified; safeguarding/NRM status.
2. Worker Interview Record (Safeguarding)
 - Consent; interpreter; open questions; observations; onward referrals.
3. Supplier Corrective Action Plan
 - Non-conformity; required actions; owner; due date; verification method.
4. Site Induction Slide/Checklist – Modern Slavery Module
 - Red flags; how to report; helplines; zero retaliation.
5. Quarterly Supplier Attestation
 - Confirmation of continued compliance; incidents reported; sub-tier updates; training stats.