# **SGF POLICIES**

**Anti-Slavery**

**Introduction**

Modern slavery is a crime resulting in despicable abuse of human rights. The Modern Slavery Act (MSA) 2015 came into force as from March 2015 and consolidates slavery and trafficking offenses. It covers four activities:

* Slavery
* Servitude
* Forced or compulsory labour
* Human trafficking

It ensures that offences are subject to the toughest asset recovery regime under the Proceeds of Crime Act 2002. The National Crime Agency, the police and other law enforcement agencies have the powers to bring to justice those engaged in human trafficking and slavery. Modern slavery is a complex and multi-faceted crime and tackling it requires all directors and staff of Scottish Grocers’ Federation (Holdings) Ltd to play a part. Protecting our workforce and reputation is vital. The MSA 2015 highlights the important need for businesses, and therefore the Federation, to play a part in tackling slavery.

The Transparency in Supply Chains Clause which came into force October 2015 requires organisations with a turnover of £36m or more to report on processes and due diligence taken to ensure that their supply chains are slavery free, and to produce and publish a slavery and human trafficking statement each financial year. The Federation does not fall into this category therefore this is not a formality that has to be followed.

The Scottish Grocers’ Federation is the only authoritative voice for the Scottish convenience store industry – an industry that provides over 44,000 jobs throughout just under 5,000 stores; Scotland has more convenience stores per head of population than the rest of the UK! We strive to ensure the viability of our retailers’ businesses in whatever way we can.

**Risk**

The principal areas of risk we face, related to slavery and human trafficking, include, but are not limited to the following:

* Board Members and their businesses
* Retail and Corporate members
* Outsourced activities
* Equipment and Service providers
* Cleaning and catering suppliers
* Corporate hospitality
* Recruitment through agencies
* General recruitment

The Federation will manage these risks through our procedures set out in this policy.

**Responsibilities**

The Federation, all employees and members have a responsibility to ensure all colleagues and Board Members are safeguarded, treated fairly and with dignity. This policy must be observed and any serious concerns which are raised will be dealt with as appropriate and may trigger the Federation’s disciplinary procedures.

The Federation will:

* Maintain clear policies and procedures preventing exploitation and human trafficking, protecting our colleagues, Board Members and our reputation
* Be clear about our recruitment policy (see Recruitment)
* Make appropriate checks on Corporate and Retail Members. With regards to national or international supply chains, our point of contact is preferably with a UK company or branch and we expect these entities to have suitable anti-slavery and human trafficking policies and processes. We expect each entity in the supply chain to, at least, adopt ‘one-up’ due diligence on the next link in the chain. It is not practical for us (and every other participant in the chain) to have a direct relationship with all links in the supply chain.
* Make appropriate checks on all employees, recruitment agencies, suppliers, etc.
* Have in place an open and transparent grievance process for all staff

Management will:

* Listen and be approachable to colleagues
* Respond appropriately if they are told something that might indicate a colleague is in an exploitative situation
* Remain alert to indicators of slavery
* Raise awareness by discussing issues and providing training
* Use their experience and professional judgement to gauge situations.

Colleagues must:

* Follow the reporting procedure (see Reporting) if there is any suspicion of a colleague or someone in our supply chain being controlled or forced by someone else to work or provide services
* Follow the reporting procedure if a colleague tells them something that may indicate they are or
* someone else is being exploited or ill-treated.

**Risk Assessment**

* Identifying suppliers by total spend/goods or services/location
* Employment
* Sector
* Relationship
* Supply chains (a supplier is any individual or company which provides goods or services)
* We (the Federation) will assess supply chains to ensure the potential for slavery and human trafficking is significantly reduced (see supplier questionnaire)
* We will inform companies that we do business with that we are not prepared to accept any form of exploitation
* Our supplier contracts will contain an anti-slavery clause which prohibits suppliers and their employees from engaging in slavery or human trafficking
* Each step of the supply process will be accounted for. We will know who is providing goods and services to us, and we will have mechanisms and processes in place to check, including:
  + Risk assessing suppliers
  + Auditing suppliers

**Recruitment Using Agencies**

* Staff recruitment will follow the Federation's policy and only use agreed specified reputable recruitment agencies
* Recruitment agencies will be checked to reduce the potential for slavery and human trafficking, and placed on a list of approved agencies. This will be achieved by:
  + Conducting background checks
  + Investigating reputation
  + Ensuring supplied staff have the appropriate paperwork
  + Ensuring assurances are provided by the agency that the appropriate checks have been made on the supplied person(s)
  + The list of approved recruitment agencies will be reviewed at least every three years

**General Recruitment**

* All staff will have a written contract of employment and will not be asked to pay any direct or indirect fees to obtain work
* The Federation will ensure staff are legally able to work in the UK;
* Names and addresses of staff will be checked to identify a high number sharing occupancy (often a factor for those being exploited);
* Information will be provided to all new recruits on their statutory rights including sick pay, holiday pay, and any other benefits they be entitled to;
* Recruitment will follow the Firm's reporting procedure should they suspect someone is being exploited.

**Identifying Slavery**

There is no typical victim and some victims do not understand they have been exploited and are entitled to help and support. The following list of indicators, which is not exhaustive, could trigger suspicions that someone may be a slavery or trafficking victim. The person:

* may not be in possession of their own passport, identification or travel documents;
* will allow others to speak for them when spoken to directly;
* will be withdrawn or appear frightened;
* does not seem to be able to contact friends or family freely;
* has limited social interaction or contact with people outside their immediate environment.

A person may display a number of the indicators as set out above but they may not necessarily be a victim of slavery or trafficking.

**Reporting**

If you have any concerns, you should raise them with the Federation’s Chie Executive, Pete Cheema (pete@sgfscot.co.uk or telephone: 07860 400585), who will decide a course of action and provide any further advice. If you believe the victim may be in immediate danger, please dial 999. Please be aware though, that 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. It is therefore important that in the absence of an immediate danger, you should discuss your concerns first with the Chief Executive before taking any further action.

**Training**

The Federation provides general awareness training by means of an online government training video. This is accessible to all our colleagues via the following link: https://www.gla.gov.uk/publications/resources/glaa-videos/glaa-modern-day-slavery/.

**Monitoring**

The Federation will monitor procedures and review the Anti-Slavery policy regularly and at least annually. We will provide information and (if necessary) training on any changes which are made.

PETE CHEEMA

Chief Executive, SGF

***Policy Reviewed, Updated and Agreed 14th November 2023***