

# Modern Slavery and Human Trafficking Policy

## Our Statement

Modern slavery is a crime and a violation of fundamental human rights. All types of modern slavery have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

This policy has been published in understanding of the UK Modern Slavery Act 2015. It presents our commitment to tackling modern slavery and human trafficking. We are committed to acting ethically and with integrity in all our business dealings and relationships and to ensure modern slavery is not taking place anywhere in our own business, or in our supply chain.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our business relationships. As part of this process, we have undertaken a review of our supply chain to identify and assess potential risk areas.

We expect high standards from all our suppliers, associates and other business partners. Wherever possible, we also expect them to have equivalent Anti-Slavery and Human Trafficking policies in place.

This policy applies to all persons working for, or on behalf of, Moore Insight in any capacity, including employees at all levels, directors, agency workers, associate consultants, contractors, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

At Moore Insight we have a zero-tolerance policy to modern slavery and human trafficking. We employ active processes and procedures to ensure that we maintain the highest professional standards, complying with all laws and regulations applicable to us.

Although not legally obliged under the threshold specified in the Modern Slavery Act 2015, we are committed to improving awareness of the practices necessary to combat slavery and human trafficking and to continually assess the risk profile of our business in these areas.

## Communication and Awareness of this Policy

Our zero-tolerance approach to modern slavery is communicated to all employees, significant suppliers, associates, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

## 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 of these activities.

## 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:

- The person is not in possession of their own passport, identification or travel documents
- The person is acting as though they are being instructed or coached by someone else
- They allow others to speak for them when spoken to directly
- They are dropped off and collected from work
- The person is withdrawn or they appear frightened
- The person does not seem to be able to contact friends or family freely
- The person has limited social interaction or contact with people outside their immediate environment

This list is not exhaustive. Remember, a person may display several 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 (See Reporting Slavery).

## Our Organisation

Moore Insight is a finance and Enterprise Resource Planning (ERP) systems consultancy dedicated to supporting public, not-for-profit and private sector clients. Our approach is based on 'making systems work' for our clients. We support organisations of any size and complexity with the full lifecycle of systems and business transformational needs from gathering requirements, reviewing current systems, improving configuration and integrations, driving business change and stakeholder engagement, outcome-based programme assurance, project management and PMO support, right through to implementing full Enterprise Resource Planning (ERP) solutions or best of breed systems. Our expertise across core business systems such as finance, HR, Payroll and procurement systems is underlined by deep sector knowledge and technical accounting excellence. We know the solutions in the market, we are able to select and configure solutions that are fit-for-purpose, and we help to deliver successful business change across the client organisation. We ensure the finance and process needs of our clients are built into their system requirements to deliver the very best outcomes for the organisation.

We are independent from any software providers but maintain excellent relationships with all major systems vendors. This allows us to provide independent advice based on best practice and our 30 years of industry knowledge and experience.

To ensure that we are an agile and flexible team, we have both permanent staff and a pool of associate consultants working in specialist areas, most with industry standard accountancy and project management qualifications. As well as our employees and project team, we have access to resources as part of the wider Moore Global network.

## How is Modern Slavery 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 is not.

At a very basic level, 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
- Any outsourced activities, particularly to jurisdictions that may not have adequate safeguards
- Cleaning and catering suppliers
- Corporate hospitality

## The Risks

The Finance, Business Development and Business Operations teams regularly review the risk profile of our supply chain to ensure that any procedures implemented are effective in countering modern slavery.

The principal areas of risk we face, related to slavery and human trafficking, include:

- Procurement supply chain
- Recruitment through agencies
- General recruitment

We manage these risk areas through our procedures as set out in this policy.

## Our Supply Chain

### Overview

As a professional services organisation, our supply chain is relatively simple. It mainly consists of experienced consultants, partner companies which support our service offers and a small amount of product procurement (for example, office supplies).

### What we Expect from Our Suppliers

Moore Insight expects all its suppliers, contractors and service providers to act with integrity and maintain ethical practices. We expect them to have effective systems, safeguards and controls in place to ensure modern slavery is not taking place anywhere in their own business or within their own supply chains. We also make it clear that we are not prepared to accept any form of exploitation.

We actively encourage key suppliers to comply with our policies through introduction sessions and by raising awareness of our policies as part of our procurement tender processes. We expect that, as a minimum requirement, they have equivalent policies in place.

### Steps we Take to Ensure Modern Slavery is not Within Our Supply Chain

We maintain a list of all key suppliers. Upon appointment of any new supplier, contractor or service provider, we carry out appropriate due diligence, including research on the supplier and assessment of their own policies. We further search online for any convictions that would mean that they have failed to comply with the Modern Slavery Act 2015.

We also ensure we can account for each step of our supply processes—we know who is providing goods and services to us and we have mechanisms and processes in place to check, including:

- Documenting who our suppliers are
- Reviewing if these suppliers require an anti-slavery and human trafficking policy that outlines the steps they are taking
- Where it is required, contacting suppliers for a copy of their anti-slavery and human trafficking policy if one cannot be found on their website
- Reviewing relevant supplier's anti-slavery and human trafficking policies to ensure they are appropriate
- Engaging and/or applying pressure or removing them from our supply chain when we believe an organisation has not taken sufficient steps to

prevent slavery from occurring within their business and supply chain

## Recruitment

### Using Agencies

Our HR team follows firm policies and only uses specific reputable recruitment agencies.

To ensure the potential for slavery and human trafficking is reduced as far as possible, we thoroughly check recruitment agencies before adding them to our list of approved agencies.

This includes:

- Conducting background checks
- Investigating reputation
- Ensuring the staff it provides have the appropriate paperwork (e.g. Work visas)
- Ensuring the agency provides assurances that the appropriate checks have been made on the person they are supplying
- Keeping agencies under regular review

### General Recruitment

We ensure all staff have a written contract of employment and they have not had to pay any direct or indirect fees to obtain work. All staff are paid in accordance with the law.

Upon recruitment of all employees and associates we conduct a full BPSS check which includes:

- Legal entitlement to work in the UK
- Confirmation of nationality
- Employment record for the past 3 years
- Valid Disclosure certificate (e.g. DBS)

We provide information to all new recruits on their statutory rights including sick pay, holiday pay, pension entitlement and any other benefits they may be entitled to. We comply with our legal obligations to ensure the health and safety of all our staff, including in relation to working hours, rest breaks and holidays.

If through our recruitment process we suspect someone is being exploited, we will follow our reporting procedures (See Reporting Slavery).

## Responsibilities

The firm, our managers and colleagues have responsibilities to ensure our fellow workers are safeguarded, treated fairly and with dignity.

Our Directors have overall responsibility for ensuring the policy is correctly implemented and for compliance with our legal and ethical obligations. Certain responsibilities may be delegated where appropriate.

However, the prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us or under our control. Therefore, it is the responsibility of everyone to observe this policy and be aware that turning a blind eye is unacceptable and simply not an option.

### The firm

We will:

- Maintain clear policies and procedures preventing exploitation and human trafficking and protecting our workforce and reputation
- Be clear about our recruitment policy (see Recruitment)
- Check our supply chain (see Steps we Take to Ensure Modern Slavery is not Within Our Supply Chain)
- Lead by example by making appropriate checks on all employees, recruitment agencies, suppliers, etc. to ensure we know who is working for us
- Ensure we have in place an open and transparent grievance process for all staff
- Seek to raise awareness so that our colleagues know what we are doing to promote their welfare
- Make a clear statement that we take our responsibilities to our employees and our clients seriously (see Our Statement)
- Review and update our Anti-Slavery and Human Trafficking Policy each financial year

### Managers

Managers 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 (see Identifying Slavery)
- 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
- Use their experience and professional judgement to gauge situations

### Colleagues

We all have responsibilities under this policy. As such, the prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us or under our control. Whatever your role or level of seniority, you must:

- Ensure that you read, understand and comply with this policy
- 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)
- Avoid any activity that might lead to, or suggest, a breach of this policy
- Report any concerns regarding modern slavery and/or human trafficking in any parts of our business or supply chain. If you are in any doubt about whether a particular act or working conditions in any of our business relationships may contravene any aspect of this policy then err on the side of caution and report it in accordance with our Whistleblowing Policy, or speak to a member of the management team
- 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
- Tell us if you think there is more we can do to prevent people from being exploited

## 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 your manager who will agree a course of action with you. You can also refer to our Whistleblowing and Open Door Policies for additional information.

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 your manager before taking any further action.

## Compliance with the Policy

We encourage openness and will support anyone who raises genuine concerns in good faith in accordance with the firm's Whistleblowing Policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their knowledge, or suspicion, that modern slavery is taking place in any part of our business or our supply chain.

## Breaches of this Policy

Any employee who breaches this policy could face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf or in our supply chain if they breach this policy.

## Specific Steps we have Taken in 2021/2022

We have undertaken the following to Identify and Mitigate Modern Slavery Risks:

- Review of our current supply chain and their anti-slavery policies
- Review and update of implementing procedures to check potential new suppliers for their anti-slavery credentials and other due diligence checks
- Continued our [Living Wage Employer](#) accreditation, paying all of our employees and consultants at least the Real Living Wage
- Delivered a training session to all employees on the importance of Anti-Slavery and Human Trafficking

## Approval and Review

This statement is made pursuant to the Modern Slavery Act 2015 and constitutes our anti-slavery and human trafficking policy for the financial year ending 30 April 2022. The policy has been approved by our Directors and Shareholders.



Peter Morley, Founding Director

**14<sup>th</sup> September, 2022**

### Contacts

If there are any questions regarding this policy or if you would like to contact us, please send an email to [Info@moore-insight.com](mailto:Info@moore-insight.com).

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