

the  
**ImpactTeam**  
**MODERN SLAVERY POLICY**

Company Name: Theimpact.team Ltd ("the Company")

Date: August 2021

Version: 1.0

**Definitions contained in the Modern Slavery Act 2015**

**Section 1 - Slavery, servitude and forced or compulsory labour.**

(1) A person commits an offence if—

- (a) the person holds another person in slavery or servitude and the circumstances are such that the person knows or ought to know that the other person is held in slavery or servitude, or
- (b) the person requires another person to perform forced or compulsory labour and the circumstances are such that the person knows or ought to know that the other person is being required to perform forced or compulsory labour.

(2) In subsection (1) the references to holding a person in slavery or servitude or requiring a person to perform forced or compulsory labour are to be construed in accordance with Article 4 of the Human Rights Convention.

(3) In determining whether a person is being held in slavery or servitude or required to perform forced or compulsory labour, regard may be had to all the circumstances.

(4) For example, regard may be had—

- (a) to any of the person's personal circumstances (such as the person being a child, the person's family relationships, and any mental or physical illness) which may make the person more vulnerable than other persons.
- (b) to any work or services provided by the person, including work or services provided in circumstances which constitute exploitation within section 3(3) to (6).

(5) The consent of a person (whether an adult or a child) to any of the acts alleged to constitute holding the person in slavery or servitude or requiring the person to perform forced or compulsory labour, does not preclude a determination that the person is being held in slavery or servitude, or required to perform forced or compulsory labour.

**Section 2 – Human trafficking**

(1) A person commits an offence if the person arranges or facilitates the travel of another person ("V") with a view to V being exploited.

(2) It is irrelevant whether V consents to the travel (whether V is an adult or a child).

(3) A person may arrange or facilitate V's travel by recruiting V, transporting or transferring V, harbouring or receiving V, or transferring or exchanging control over V.

(4) A person arranges or facilitates V's travel with a view to V being exploited only if—

- (a) the person intends to exploit V (in any part of the world) during or after the travel, or
- (b) the person knows or ought to know that another person is likely to exploit V (in any part of the world) during or after the travel.

(5) “Travel” means—

- (a) arriving in, or entering, any country,
- (b) departing from any country,
- (c) travelling within any country.

(6) A person who is a UK national commits an offence under this section regardless of—

- (a) where the arranging or facilitating takes place, or
- (b) where the travel takes place.

(7) A person who is not a UK national commits an offence under this section if—

- (a) any part of the arranging or facilitating takes place in the United Kingdom, or
- (b) the travel consists of arrival in or entry into, departure from, or travel within, the United Kingdom.

### **Section 3 – Meaning of Exploitation**

(1) For the purposes of section 2 a person is exploited only if one or more of the following subsections apply in relation to the person.

Slavery, servitude and forced or compulsory labour.

(2) The person is the victim of behaviour;

- (a) which involves the commission of an offence under section 1, or
- (b) which would involve the commission of an offence under that section if it took place in England and Wales.

Sexual exploitation

(3) Something is done to or in respect of the person—

- (a) which involves the commission of an offence under—
  - (i) section 1(1)(a) of the Protection of Children Act 1978 (indecent photographs of children), or
  - (ii) Part 1 of the Sexual Offences Act 2003 (sexual offences), as it has effect in England and Wales, or
- (b) which would involve the commission of such an offence if it were done in England and Wales.

Removal of organs etc

(4) The person is encouraged, required, or expected to do anything—

- (a) which involves the commission, by him or her or another person, of an offence under section 32 or 33 of the Human Tissue Act 2004 (prohibition of commercial dealings in organs and restrictions on use of live donors) as it has effect in England and Wales, or
- (b) which would involve the commission of such an offence, by him or her or another person, if it were done in England and Wales.

Securing services etc by force, threats or deception

- (5) The person is subjected to force, threats or deception designed to induce him or her—
  - (a) to provide services of any kind,
  - (b) to provide another person with benefits of any kind, or
  - (c) to enable another person to acquire benefits of any kind.

Securing services etc from children and vulnerable persons

- (6) Another person uses or attempts to use the person for a purpose within paragraph (a), (b) or (c) of subsection (5), having chosen him or her for that purpose on the grounds that—
  - (a) he or she is a child, is mentally or physically ill or disabled, or has a family relationship with a particular person, and
  - (b) an adult, or a person without the illness, disability, or family relationship, would be likely to refuse to be used for that purpose.

### **Modern Slavery Policy**

1. The Impact Team is committed to eliminating modern slavery, human trafficking, forced labour, and similar human rights abuses.
2. The Impact Team is committed to ensuring that its staff and any workers it supplies (directly or indirectly) are not subject to behaviour or threats that may amount to modern slavery, human trafficking, forced labour, and similar human rights abuses.
3. The Impact Team provides appropriate training and awareness information for all of its staff. In particular:
  - Our leadership team receive training in identifying and resolving concerns around modern slavery and human trafficking.
  - Our recruiters and HR personnel, undertake training courses that include guidance around modern slavery and human trafficking, as well as other wider human rights issues.
  - All of our staff receive awareness-raising information around issues involving modern slavery and human trafficking, so that they can bring any concerns they have to the attention of management.
4. Any staff, workers or other parties are strongly encouraged to report any concerns or suspicions that they might have to their manager or company director.
5. Reports surrounding these issues are taken extremely seriously by our board of directors who are committed to ensuring that all investigations shall be prompt and effective. If our

investigations reveal any issues, we are committed to taking appropriate action, including but not limited to:

6.
  - Working with the appropriate organisations to improve standards,
  - Removing that organisation from our preferred supplier list,
  - Passing details to appropriate law enforcement bodies.
7. We regularly monitor our risks in this area using relevant key performance indicators, including:
  - The effectiveness of enforcement against suppliers who breach policies,
  - The amount of time spent on audits, re-audits, spot checks, and related due diligence, and
  - The level of modern slavery training and awareness amongst our staff.
8. As part of our efforts in this area, we publish a modern slavery statement on an annual basis.
9. We would also recommend reading this in conjunction with our other policies, including our:
  - Corporate social responsibility policy,
  - Anti-bribery / corruption policy, and
  - Whistle-blowing policy.

This policy was adopted on 16/08/2021 after being agreed by our board of directors. It is reviewed annually.

### **Modern Slavery Statement**

This statement is made as part of The Impact Team's commitment to eliminating the exploitation of people under the Modern Slavery Act 2015 (the Act). It summarises how The Impact Team operates, the policies and processes in place to minimise the possibility of any problems, any risks we have identified and how we monitor them, and how we train our staff.

This statement is published in accordance with section 54 of the Act, and relates to the financial year 1<sup>st</sup> November 2021 to 31<sup>st</sup> Oct 2022. It was approved by the board of directors on [16.09.2021].

## **1 Our Business**

The Impact Team is a limited company operating in the IT consulting sector. We provide consulting services / supply workers in the financial sectors.

The Impact Team is part of Spier Group.

### **1.1 Who we work with**

As a “master vendor”, we work with other businesses to supply workers to hiring companies. We hire some of the workers directly, who are directly recruited by our staff. Other workers are hired directly by other businesses. Some of these workers operate through their own limited companies

The hiring companies that we work with are located in the United Kingdom, Europe, North America and the Middle East. Workers we supply work remotely and operate online.

### **1.2 Other relationships**

As part of our business, we also work with the following types of organisations:

- the Recruitment and Employment Confederation ([www.rec.uk.com](http://www.rec.uk.com)) [and/or] the Institute of Recruitment Professionals ([www.rec-irp.uk.com](http://www.rec-irp.uk.com))
- Office suppliers
- Software suppliers

## **2 Our Policies**

The Impact Team has a modern slavery policy available upon request or on the company SharePoint for employees.

In addition, The Impact Team has the following policies which incorporate ethical standards for our staff.

- Anti-bribery policy
- Equal Opportunities and diversity policy

### **2.1 Policy development and review**

The Impact Team’s policies are established by our senior leadership team, based on advice from HR professionals, industry best practice and legal advice, and in consultation. We review our policies annually, or as needed to adapt to changes.

## **3 Our Processes for Managing Risk**

In order to assess the risk of modern slavery, we use the following processes with our suppliers:

- We conduct audits before entering into a commercial relationship with any business where there is the potential for risk. These audited businesses form the basis of our preferred supplier list.
- We review the potential for risk at regular intervals, including the possibility of re-auditing a supplier or conducting spot checks.

After due consideration, we have not identified any significant risks of modern slavery, forced labour, or human trafficking in our supply chain. However, we continue to be alert to the potential for problems.

Additionally, we have taken the following steps to minimise the possibility of any problems:

- We reserve the right to conduct spot-checks of the businesses who supply us, in order to investigate any complaints.
- We require the businesses we work with to [abide by our code of supplier conduct, and we encourage them to publish a modern day slavery statement
- Only senior members of staff who have undergone appropriate training for assessing modern slavery risks in the supply chain are authorised to sign contracts and establish commercial relationships in any area where we have identified the potential for risk.

Our staff are encouraged to bring any concerns they have to the attention of management.

#### **4 Our Performance**

Based on the potential risks we have identified, we have also established the following key performance indicators, which are regularly assessed by our directors:

- the percentage of suppliers who sign up to an appropriate code / provide their own modern slavery statements
- the amount of time spent on audits, re-audits, spot checks, and related due diligence
- the level of modern slavery training and awareness amongst our staff

We carefully consider our indicators, to ensure that we do not put undue pressure on our suppliers that might increase the potential for risk.

#### **5 Our Training**

All of our staff receive training and support that is appropriate to their role. In particular:

- All of our staff receive awareness-raising information around issues involving modern slavery and human trafficking, so that they can bring any concerns they have to the attention of management. Varied levels of training are offered depending on company role.

**As part of this, our staff are encouraged to discuss any concerns that they have. Training is refreshed annually.**