



**SJOG**  
**MODERN DAY SLAVERY & TRAFFICKING**  
**STATEMENT 2022/23**



## Summary

The crime of modern day slavery, in all its forms, has a profound and devastating impact on human lives. It leads to significant and disabling mental health problems, and subsequently impacts on people's health and social care needs, whilst also exposing people to further hardship in their future lives.

At the core of SJOG are our values of hospitality, compassion and respect. When people are rescued, we are there to open our doors and say come in you are most welcome. We offer accommodation and a place of safety and warmth so that, in time, people can rebuild their lives.

Our purpose is very simple, we're here to help.

### Definitions

#### Definition of slavery and servitude

Slavery, in accordance with the 1926 Slavery Convention, is the status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised. Since legal 'ownership' of a person is not possible, the key element of slavery is the behaviour on the part of the offender as if he/ she did own the person, which deprives the victim of their freedom. Servitude is the obligation to provide services that are imposed by the use of coercion and includes the obligation for a 'serf' to live on another person's property and the impossibility of changing his or her condition.

#### Definition of human trafficking

An offence of human trafficking requires that a person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult. In addition, the exploitation of the potential victim does not need to have taken place for the offence to be committed. It means that the arranging or facilitating of the movement of the individual was with a view to exploiting them for sexual exploitation or non-sexual exploitation.

Source: [www.gov.uk/publications/](http://www.gov.uk/publications/)

#### The Modern Slavery Act 2015

Certain commercial organisations must publish an annual statement setting out the steps they take to prevent modern slavery in their business and their supply chains. This is a requirement under Section 54 (Transparency in Supply Chains) of the Modern Slavery Act 2015. A commercial organisation is required to publish an annual statement if all the criteria below apply:

- it is a 'body corporate' or a partnership, wherever incorporated or formed
- it carries on a business, or part of a business, in the UK
- it supplies goods or services
- it has an annual turnover of £36 million or more

This statement must set out the measures an organisation has taken during its financial year to ensure that slavery or human trafficking is not taking place in any of its supply chains or within itself.

Source: [www.gov.uk/publications/](http://www.gov.uk/publications/)

## Modern Day Slavery and Trafficking

Modern slavery is an international crime affecting an estimated 40.3 million individuals around the world. This global issue transcends age, gender and ethnicities. It is estimated that 1 in 4 victims of modern slavery are children.

'Modern slavery' refers to the offences of human trafficking, slavery, servitude, and forced or compulsory labour. This can be broadly categorised under five headings:

- the sexual exploitation of adults;
- the trafficking of adults into conditions of labour exploitation;
- the trafficking of adults into conditions of criminal exploitation;
- the trafficking of minors into conditions of sexual, criminal or labour exploitation;
- other forms of exploitation.

'Human trafficking' involves the recruitment, transfer or obtaining of an individual through coercion, abduction, fraud or force to exploit them. Although human trafficking often involves an international cross-border element, it is also possible to be a victim of modern slavery within your own country. There are several broad categories of exploitation linked to human trafficking, including sexual exploitation, forced labour, domestic servitude, organ harvesting, child related crimes, forced marriage and illegal adoption.

Modern slavery includes victims who have been brought from overseas and vulnerable people in the UK and in Ireland who are forced to work illegally against their will across many different sectors such as agriculture, hospitality, construction, retail and manufacturing.

Estimates of the number of victims of modern slavery in the UK and Republic of Ireland have increased markedly in recent years. The 2018 Global Slavery Index estimated 136,000 individuals in the UK.

It has been estimated that globally modern slavery generates as much as \$150bn (£116bn) in profits every year with more than a third of these profits generated in developed countries, including the UK.

## **SJOG Structure and Supply Chains**

SJOG is a charity with a 500 year old heritage dedicated to vulnerable people. We diversify in various care and support services for vulnerable adults across different dimensions in health and social care and have a strong presence in the sector.

We employ over 600 colleagues across the UK. As a charitable company we are regulated by the Charity Commission and our annual reports and records can be viewed online at [www.gov.uk/government/organisations/charity-commission](http://www.gov.uk/government/organisations/charity-commission) and at companies house.

We have worked throughout 2020 to strengthen and support our partnerships that support people who have been trafficked or subject to modern day slavery. We are proud of our strong partnerships and work to improve collaboration in the sector by seeking joint working opportunities, funding and ways to show case the work we do. We have worked to strengthen our operational offer in the UK, and have improved our capacity so that we can support more adults who have been trafficked and affected by slavery.

We recognise a risk when dealing with suppliers of products and services, particularly those who have operations and suppliers in other countries. However, SJOG considers that we, and the majority of our suppliers, are not in industries with a high risk of modern day slavery. We also undertake strong due diligence with our partners so that we only work alongside ethical and reputable organisations, vendors, landlords and contractors.

## **SJOG Policies – in relation to Slavery and Trafficking**

Our policy is to conduct all our business in an honest and ethical manner, complying with all applicable legislations.

We strive to ensure that neither modern day slavery nor human trafficking supports our supply chain or our work. This objective is implicit in our policies and procedures. We aim for a zero-tolerance approach to violations of anti-slavery and human trafficking laws.

We aim to regularly review our business policies and continuation of business with any individuals and organisations found to be involved in slavery, human trafficking, forced or child labour and retain the right to cease business with such individuals and organisations on this basis.

SJOG is a charity that acts professionally and with integrity in all its business practices and relationships, and with all stakeholders.

Our LOVED Programme (Living Our Lives Every Day) promote our values of Hospitality, Compassion, and Respect on a daily basis and in how we support each other.

Our policies in relation to modern day slavery and trafficking include:

- Staff Induction
- Staff Handbook
- Client Handbook
- Safer Recruitment
- Safeguarding
- Incident and Accident Reporting and Mitigation
- Complaints and Concerns
- Management of Contractors
- Permit to Work

## **SJOG - Due Diligence Processes**

Due diligence is carried out on all suppliers where there may be any recognised risk of modern day slavery and/or trafficking. Suppliers are required to fill in a due diligence form that outlines competency, regulated certificates and references, which is in line with the Construction (Design and Management) Regulations 2015 (CDM) and includes:

- Company details – company registration no. etc.
- Company history – any bankruptcy, liquidation etc.
- Any criminal activities involving the directors etc.
- Plant, equipment and vehicle maintenance/inspection
- Safety scheme membership
- Insurances
- Safety surveillance and advice
- Safety systems at work
- Information security and data protection
- Sub-Contractors
- Environmental/waste management
- Any other relevant Information

We show particular interest in accessing the statements of suppliers on modern day slavery and trafficking where their annual turnover is above £36 million/ pa.

## **SJOG - Risk Assessment and Management**

SJOG aims to risk assess and mitigate the risks in line with its strong view to curb any slavery and trafficking instances. We do this in a number of ways:

**Whistleblowing** - All colleagues and partners have a statutory obligation to report knowledge or suspicion of slavery or human trafficking. Any genuine suspicion or

knowledge of slavery or human trafficking is to be immediately reported to the relevant contracting authority and to the Executive Management Team, who will decide what further action, if any, is deemed necessary. If the issue reported also relates to knowledge or suspicion of money laundering or terrorist financing then a further report is to be submitted to the Money Laundering Reporting Officer (MLRO) and/or Police.

Partners and SJOG colleagues who raise concerns of slavery or human trafficking in good faith may do so without fear of discrimination or reprisal.

These provisions do not replace any legal reporting or disclosure requirements. Where statutory reporting requirements and procedures exist, these will be fully complied with.

**Safer Recruitment Processes** – SJOG has a stringent recruitment process in place to ensure a recruitment process that is free of any discrimination and bias. The process ensures that candidates are selected based on their experience, qualifications and values.

All colleagues are DBS vetted to an ENHANCED LEVEL. This includes agency colleagues, along with other pre-employment checks this forms part of our safer recruitment processes.

After selection, colleagues are taken through an induction programme and a probation period that lasts six months. Colleagues are well aware of their objectives, key performance indicators are shared with them, and a performance management framework is followed to manage performance. This ensures uniformity of the process across the organisation and a shared approach to our work. SJOG recognises the good work of our colleagues and promote this regularly through #GoodWork.

**Complaints and Concerns Procedure** – SJOG has an open and transparent procedure. The policy clearly states the means to raise a complaint. The complaint is followed through by the person it was reported to and a separate investigator investigates the raised complaint. The process further necessitates the complaint to be concluded with an action plan and the outcome to be shared with the complainant, and the Executive Management Team.

For people in our services, the process is similar, with access to additional contacts to raise their complaints and concerns, for example The Salvation Army, to whom SJOG is a sub-contractor in the case of clients for Homelessness and Modern Day Slavery and trafficking services within SJOG.

## Key Performance Indicators to Measure Effectiveness

SJOG measures the effectiveness of its policies and procedures against trafficking and slavery as follows:

| MEASURE  | PROGRESS  |
|--|---|
| Supplier check   | <p>All suppliers are required to provide information through Competency certificate, which is in line with the Construction (Design and Management) Regulations 2015 (CDM).</p> <p>This ensures that the Charity has full information on its suppliers and their code of conduct in the business.</p>   |
| Permit to work and Management of Contractors Policies  | <p>The policies cover key areas of working with contractors and both risk assess and mitigate the risks. Key areas covered are:</p> <ul style="list-style-type: none"> <li>• Complete information about the companies/ contractors</li> <li>• Adherence to use only approved contractors as much as possible</li> <li>• Management of contractors</li> <li>• Supervisions and safety management of contractors working on sites</li> <li>• Monitoring of compliances and effectiveness</li> <li>• Compliance with local safety measures</li> <li>• PPE, welfare and other facilities</li> <li>• Lone working</li> <li>• Infection control and prevention</li> <li>• Reporting of any incidents/ accidents etc.</li> </ul> <p>The robust policies ensure all safety measures and precautions are taken with contractors working with us.</p> |
| Whistleblowing policy  | <p>This has given a safe abode to staff and clients alike to raise any concerns or any undue sightings where another individual may be at risk of modern slavery or trafficking.</p>  |
| Hiring colleagues through stringent processes and ensuring non-discriminatory and fair process | <p>SJOG colleagues are hired with a transparent and fair process. This is monitored by the Head of HR.</p> <p>All colleagues on contractual hours, bank and agency have been DBS vetted to Enhanced Level.</p>  |



## Responding through operations

We are committed to recognising and responding to trafficking not only where we encounter it in our supply chains, but also as a key part of our service operations.

Since 2014, SJOG has supported survivors of trafficking and modern slavery. Our focus is on ensuring that survivors of trafficking are provided with the support they need to recover from the trauma they have experienced, and that they are enabled to make informed choices about their futures. Anti-trafficking remains a core priority of our work strategy with the Homelessness and Modern Day Slavery/ Trafficking Services and a major area of our operational delivery.

The Homelessness and Modern Day Slavery/ Trafficking Services within SJOG are dedicated to provide support to recognised potential victims of modern day slavery and trafficking.

People are supported to access and receive their entitlements under a recovery and reflection period, as part of Victim Care Contract under the Home Office. SJOG services aim to help people meet these entitlements and provide for a safe and secure stay and a future move-on.

## SJOG – Training on Modern Day Slavery and Trafficking

Our objective is to ensure that more people are aware of trafficking, equipped to spot signs and know the internal referral pathway if they need to raise or report a concern.

We believe that we need to provide clear frameworks that enable people to respond consistently and appropriately every time they are concerned about human trafficking. To support our frontline colleagues in meeting this responsibility, we have developed internal anti-trafficking guidance documents targeted at various audiences within our charity, such as:

- Training on understanding of different types of abuse and harm, including modern slavery and trafficking
- Training on safeguarding
- Training in complaints handling
- Training in recognising and addressing depression and anxiety
- Training in presenting extremism and radicalisation
- Training in self-harm and mental health

In order to promote greater awareness of modern day slavery and trafficking, we have committed to providing mandatory training for all our SJOG colleagues. This training is provided by our own colleagues who have significant experience in the field and offer colleagues an insight into the signs of modern day slavery and how to act and report.



In line with our mission and values we will always keep on being vigilant and share the knowledge so this abhorrent phenomenon is tackled and more individuals are free from shackles and fulfilled lives can be lived.