

Modern Slavery Policy

Introduction

This Policy sets out the steps Harrow BID will take to comply with the Modern Slavery Act 2015 and our commitment to acting ethically and with integrity in our organisations relationships across the UK. In addition to ensure that slavery is not taking place in our partnering and supplier organisations.

This document sets out the policy of Harrow BID with the aim of the prevention of opportunities for modern slavery to occur within the organisation or within our suppliers. This policy's use of the term "modern slavery" has the meaning given in the Act.

Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the "Act"). The Act is designed to tackle slavery in the UK and consolidates previous offences relating to trafficking and slavery. Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We seek to operate a number of policies which reflect our commitment to acting properly in all of our organisational relationships and to implementing and enforcing effective systems and controls. Our aim to minimise the risk of modern slavery and human trafficking in our organisation.

We will continue to review our policies to ensure that they are effective and appropriate. Subject to changes in legislation, this Policy will be reviewed and updated accordingly.

Slavery can take many forms. These include:

- Child trafficking
- Forced labour
- Forced marriage
- Sexual exploitation
- Criminal exploitation
- Domestic servitude
- Labour exploitation
- Organ harvesting

Harrow BID will not tolerate slavery in any aspect of our organisation. We hold our suppliers and ourselves accountable and we will ensure compliance with the provisions of the Modern Slavery Act 2015 in relevant aspects of our work.

Policy Outline

This policy document provides an overview of our zero-tolerance approach to modern slavery. We assess risks and seek to ensure that our contractors, consultants and suppliers in areas where a potential risk may occur, actively

work towards eradicating modern slavery. Where appropriate we will provide guidance to colleagues on modern slavery through training and sharing Modern Slavery information and links to useful websites, organisations and materials, including Anti-slavery International; Unseen UK and the UK government.

How to Report Modern Slavery Concerns

If we suspect incidents or signs of modern slavery we will report in the following manner:

- In the first instance, all modern slavery crimes should be reported to the local police by dialling 999.
- If we hold information that could lead to the identification, discovery and recovery of victims, we will contact the Modern Slavery Helpline 0800 0121 700.
- More information can be found at: www.unseenuk.org
- Alternatively, calls can be made anonymously to Crimestoppers on 0800 555 111.

Monitoring, Review and Performance Information

The monitoring and effectiveness of this policy will be managed by Company Management and will include:

- Recording and monitoring any incidents or reports made to Harrow BID which conflict with our values.
- Treating all reports and incidents in line with our confidentiality.
- Reviewing and strengthening our procurement taking into account a range of risks, including slavery and human trafficking.

Harrow BID Anti-Slavery Statement 2024/25

Harrow BID takes a zero-tolerance approach to slavery and human trafficking. Our organisation is committed to ensuring that slavery and human trafficking do not take place in our business and we take steps to ensure that they do not take place in our supply chains or collaborations directly or indirectly with the position monitored on a regular basis.

We consider the areas in which we work and the collaborations assessing the varying risks of slavery from low to high. We review each piece of work to ensure we are compliant with the UK's Modern Slavery Act 2015. We undertake annual reviews to ensure we have appropriate procedures in place and are satisfied that we remain compliant.

Our Contracts / collaborations

We assess all new contracts and collaborations taking a zero-tolerance approach. This is reflected within our due diligence processes and the standard terms that our suppliers must agree to. Our contracts and collaborations are solely based in the UK, although some collaborators operate internationally. Where collaborators operate abroad in countries with a higher risk of slavery and human trafficking these collaborators are subject to regular due diligence.

Internal policies

The organisation is committed to paying everyone directly employed, whether permanent staff or suppliers, a rate of pay that is at least in-line with the current National Living wage set by the government. All of our management team and partners are required to support, and adhere to our zero-tolerance approach and will continue to do so.

A nominated team member will be the appointed individual within Harrow BID with responsibility to oversee the communication of the anti-slavery and anti-human trafficking policy within Harrow BID and to our collaborators.