

Anti-Slavery & Human Trafficking Policy

1. POLICY STATEMENT

Violations and crimes to fundamental human rights takes place in various forms, such as slavery, servitude, forced and compulsory labour, sexual exploitation and human trafficking ("modern slavery"), all of which include the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Get Active Sports has a zero-tolerance approach to the violations within its business and supply chains.

This policy applies to all persons working for Get Active Sports, or on our behalf, in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, and apprentices and our contractors, external consultants, agencies, third-party representatives, and business partners ("Suppliers").

Get Active Sports is committed to:

- Acting ethically and with integrity in all our business dealings and relationships
- Implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or in any of our supply chains
- Ensuring there is transparency in our approach to tackling modern slavery in our business

We expect the same high standards from all our Suppliers. As part of our contracting process, we include specific prohibitions against modern slavery, and we expect that our Suppliers will hold their own suppliers to the same high standards.

2. IDENTIFYING MODERN SLAVERY

Modern slavery may be found in:

- Our business
- Our supply chains
- Outsourced activities, particularly to jurisdictions that may not have adequate modern slavery safeguards.

There is no typical victim of modern slavery, 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 victim of modern slavery or human trafficking:

- 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.
- The person allows others to speak for them when spoken to directly.
- The person is dropped off and collected from work.
- The person is withdrawn or appears frightened.

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- 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 of their immediate environment.

The above list is not exhaustive. A person may display a number of the indicators set out above, but they may not necessarily be a victim of slavery or trafficking.

3. County lines

County is a cross-cutting issue that often overlaps with other forms of abuse and criminal exploitation. It can lead to serious physical and emotional harm to young people (Home Office, 2020a).

Criminalisation

If adults who work with children don't understand that county lines is a form of abuse, they may see children involved in county lines activity as criminals rather than as victims of criminal exploitation (Children's Society, 2019). This can lead to children not getting the safeguarding support and protection they need.

Drugs

Perpetrators may use drugs and alcohol to entice young people into the gang lifestyle.

In some cases, gangs trick young people into incurring drug debts that they then have to pay off through county lines activity. This is often referred to as 'debt bondage'.

Physical violence

There is a strong link between county lines activity and:

- serious violence such as knife and gun crime
- the use of substances such as acid as a weapon
- homicide

(Home Office, 2018).

Conflict between rival gangs that are in dispute over who controls an area can lead to serious injury or death for young people who get caught in the wrong place.

The fear of serious physical violence as revenge for disrespecting, 'snitching' or 'grassing' is one of the things that prevents young people from leaving gangs or seeking help from the police and other agencies.

Sexual abuse and exploitation

As well as being used to transport drugs, county lines gangs may sexually abuse and exploit children of any gender (National Crime Agency, 2018).

This can happen through:

- young people being forced into sexual activity with gang members or for the gang's financial gain
- vulnerable children being made to work off drug debts through sexual exploitation as 'payment' (this might happen after the child has been coerced into becoming dependent on drugs by the gang)
- children being groomed into what they believe is a romantic relationship with a gang member which then leads to exploitation

(National Crime Agency, 2018).

Some children are forced to transport drugs in ways that are invasive and harmful to their bodies. Young people may be forced to swallow bags of drugs to transport them, which could potentially be life threatening.

The practice of 'plugging' is also common, whereby drugs are inserted into a child's rectum or vagina. This is a form of sexual abuse and in some cases it can cause a child's death (Ofsted et al, 2018).

Trafficking and missing children

Young people can be trafficked to locations far away from where they live for long periods of time by a county lines gang. They may end up staying in unsuitable accommodation in an area that is unknown to them. This might include short term holiday lets or budget hotels.

Cuckooing

Cuckooing happens when a county lines gang takes over the home of a vulnerable adult by coercion or force, and use it as a base to deal drugs from. The vulnerable adult may have issues with substance misuse or mental health problems, be elderly or disabled or be in debt to the gang. These factors can make it easier for the gang to exploit and control them.

Children can be forced or coerced to stay at cuckooed addresses for long periods of time to deal drugs. They may be on call for the gang 24 hours a day (National Crime Agency, 2018).

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A cuckooed address is sometimes referred to as a 'bando' or a 'spot' by county lines gangs (Thurrock Council, 2020).

Financial exploitation and abuse

Gangs are known to launder money from drug sales through children's bank accounts, either by using an existing account or forcing or persuading the child to open a new one (Children's Society, 2019).

County lines gangs might refer to 'squares' - meaning cash cards, and 'deets' - meaning bank details (Safe4Me, 2019).

4. RESPONSIBILITY FOR THIS POLICY AND COMPLIANCE

- The board of Directors has overall responsibility for ensuring this policy complies with the company's legal and ethical obligations.
- The Legal Team has primary and responsibility for implementing this policy and dealing with any queries about it.
- All Get Active Sports Staff members must comply with this policy.
- All Suppliers must comply with this policy.

5. REPORTING MODERN SLAVERY

Get Active Sports Staff and Suppliers must report any incidence or suspicion of any of the activities laid out in this document at the earliest possible stage to:

- If you are a Get Active Sports staff member, your Line Manager; or
- If you are a Supplier, your primary account manager or business contact with the Group.

5. PUBLICATION OF THIS POLICY

This policy, and a training note on the issue of these activities, is available to Get Active Sports Staff and suppliers on request.

6. BREACHES OF THIS POLICY

- Any Get Active Sports Staff member who breaches this policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

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- The relevant member of the company may terminate its relationship with a supplier if it is in breach this policy. Alternatively, the relevant member of the company may elect to work with the supplier to resolve such issues.

7. POLICY REVIEW

- The SLT, in conjunction with Human Resources, is responsible for reviewing this policy as necessary to ensure that it meets legal and ethical requirements and reflects best practice.
- This policy does not form part of any contract of employment and may be amended at any time.



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*Get Active Sports Policies and Procedures
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