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Aster Interiors  
335 City Road  
London EC1V1LJ

## Equalities and Modern Slavery Policy

### MANAGING THE POLICY

#### Ownership

This policy is owned by the Responsible Officer,

#### Governance

The implementation and success of this policy will be monitored by the Responsible Officer.

The following are accountable, responsible, consulted and informed in respect of this policy:

Responsible	Lauren Fanning
Accountable	Lauren Fanning
Consulted	
Informed	

#### Review

Review will be undertaken by the Lauren Graham every 12 months and reissued in its entirety.

Issue	Date	Reason
1.0	01-10-21	Original Policy
	October 2023	Annual Review

#### Compliance

All staff, members and contractors or others with access to council information must comply with this policy. If you do not understand the implications of this or how it may apply to you, seek advice from Human Resources.

#### Equality and Diversity

Every policy must consider equality and identify any potential barriers or discrimination faced by people protected by equality legislation.

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Aster Interiors aims to design and implement policy documents that meet the diverse needs of our staff and workforce, ensuring that none are placed at a disadvantage compared to others.

We consider the provisions of the Equality Act 2010 and promotes equal opportunities for all. We ensure that no one receives less favourable treatment on the protected characteristics of their age, disability, sex (gender), gender reassignment, sexual orientation, marriage and civil partnership, race, religion or belief, and pregnancy and maternity.

### **Introduction**

Aster Interiors acknowledges its responsibility for safeguarding the wellbeing of its staff, clients and workforce. All staff working for Aster Interiors could, potentially, encounter a victim of modern slavery. We all have a duty of care to take appropriate action and there is a legal obligation to act where the victim is under the age of 18. The aim of this guidance is to provide staff with clear direction for reporting incidents of modern slavery brought to their attention, both through their work and outside of work.

### **The Modern Slavery Act**

The 'Modern Slavery Act 2015' received Royal Assent on 26 March 2015 and is compatible with the Human Rights Act 1998 and the Equality Act 2010. The Act was introduced to protect individuals held against their will in relation to slavery, servitude and forced or compulsory labour, human trafficking and exploitation.

Modern slavery is the illegal trade of human beings used for the purpose of commercial sexual exploitation or reproductive slavery, forced labour, or a modern-day form of slavery. This could relate to British and foreign nationals trafficked into, around and out of the UK. Children, women and men can all be victims of modern slavery.

### **Responsibility**

Aster Interiors, Human Resources Department and Director have overall responsibility for ensuring that staff are aware and receive appropriate support for dealing with issues regarding the Modern Slavery Act.

### **Reasons for Trafficking**

There are a wide range of reasons which involve modern slavery / trafficking but the main one Aster Interiors could come across would be –

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- Forced labour including in the agricultural, construction, food processing, hospitality industries and in factories;

Working in an environment where hard labour and construction is involved you could come across a sign of modern slavery. You may encounter this via –

- . A person may tell you about their experience
- . You detect signs that may suggest a person may have been trafficked
- . A trafficked person may be referred to you

## **Health Care Issues**

A victim of modern slavery may come to a staff's attention, this could include –

- Evidence of long term multiple injuries
- Poor nutrition
- Dental pain
- Fatigue
- Non-specific symptoms of post-traumatic stress disorder
- Symptoms of psychiatric and psychological distress
- back pain, stomach pain, skin problems, headaches and dizzy spells.

## **Signs of Trafficking**

There are possible signs staff may come across that informs them that a person is a victim of trafficking. Examples include:

- Withdrawn and submissive
- Seems afraid to speak when addressed
- Gives vague and inconsistent explanation of where they live, their employment or schooling
- Has old or serious injuries left untreated and gives unclear information or is reluctant to explain how the injury occurred
- Struggles to speak English
- Has no means of identification / suspicious looking documents

## **Suspecting a Situation**

Staff need to trust and act on their professional instinct that something is not quite right. It is usually a combination of triggers, an inconsistent story and a pattern of symptoms that may cause you to suspect trafficking.

- Trafficked people may not self-identify as victims of modern slavery

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- Trafficking victims can be prevented from revealing their experience from fear, shame, language barriers
- A lack of opportunity or a feeling that they are not safe enough to open up

What you should do?

Staff need to acquire as much information as possible from the individual(s) by speaking to them privately without alarming them.

Take action by;

- Reassuring the individual(s) that it is safe for them to speak
- Asking questions that are non-judgmental and relevant
- Giving the individual time to talk about their experiences
- Inform the Director immediately

Do not;

- Make promises or raise expectation that you cannot keep
- Raise your trafficking concerns with anyone accompanying the individual
- React in an insensitive way that may affect the safety of the individual

Signed by:



Scott Fanning - Director

Date: 27-10-21

