

Stratherrick and Foyers Community Trust Limited  
Human Trafficking and Modern Slavery Statement and Policy  
December 2022

**PEOPLE SHOULD NOT  
BE BOUGHT AND SOLD**

**HUMAN TRAFFICKING  
IS HAPPENING IN SCOTLAND**



FOR MORE INFORMATION VISIT  
[WWW.MODERNSLAVERYHELPLINE.ORG/SCOTLAND](http://WWW.MODERNSLAVERYHELPLINE.ORG/SCOTLAND)

TO REPORT ANY CONCERNS  
CALL 08000 121 700



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Statement and Policy adopted by the Trust Board 22/12/2022  
Review of Statement and Policy due 20/11/2024

## **INTRODUCTION**

In October 2015, the Scottish Parliament passed the [Human Trafficking and Exploitation \(Scotland\) Act 2015](#).

Human trafficking is about the illegal trade of human beings for exploitation. It also encompasses slavery, servitude and forced or compulsory labour.

The Act places a legal duty on large businesses with a turnover of £36million a year or more to undertake Human Trafficking and Modern Slavery reports and other specific actions. Businesses with a lower turnover, such as Stratherrick and Foyers Community Trust are advised to take the issue of the identification and reporting of suspicions of human trafficking and modern slavery very seriously.

## **STATEMENT**

Areas which are particularly relevant to the Stratherrick and Foyers Community Trust include -

1. Looking at the Trust's supply chain to see if any of the firms we deal with may be complicit in slavery or people trafficking.
2. Ensuring none of the Trust's recruitment or agency staff agreements, or contracts with employees are in breach of the law, for example by paying below the legal minimum wage or requiring employees to work under terms including a threat of punishment.
3. The Trust must show it understands the issues around modern slavery and is aware that it has a role, ethically and legally in reporting incidents should directors, volunteers or staff encounter possible offences.
4. In turn, those who support the Trust, our members, funders and businesses we deal with all have an expectation (and for large businesses a legal requirement) to ensure that the Trust is aware and vigilant on modern slavery issues. The Trust should ensure that one of its business ethics is to recognise and put in place a policy for identifying and reporting suspicions of Modern Slavery and Human Trafficking.
5. Additional vigilance should be given to areas including hospitality, grounds maintenance, building sub-contracting and cleaning, where cases of exploitation are more likely to arise. Workers in businesses or individual homes employed on a 'live-in' basis can be particularly vulnerable to exploitation.

## ACTIONS

### Specific Trust Policy – Human Trafficking and Modern Slavery

Stratherrick and Foyers Community Trust will –

Item	Policy	Agreed
1 Awareness	Make sure each director, volunteer and employee is aware that modern slavery and human trafficking is an issue in Scotland today.	
2 Procedure	Make sure all directors, volunteers and staff are aware they must be vigilant and that they are required to report any potential cases to their line manager or the Chair of the Trust. The CEO and / or Chair of the Trust will decide whether to make a formal report or an anonymous report to the contacts listed on the Human Trafficking Aide Memoire pdf. or contact Email: <a href="mailto:human.trafficking@gov.scot">human.trafficking@gov.scot</a> Phone: 0131 244 2693 Human Trafficking Team, GWR, St Andrew's House, Edinburgh, EH1 3DG	
3 Ongoing	Display and maintain a Human Trafficking awareness poster at the Trust's property at the Wildside Centre, Whitebridge.	
4 Ongoing	Add and maintain a link to human trafficking and modern slavery aide memoire to the Trust's website.	

5  Ongoing	When posting tenders or procuring services, make sure our suppliers are aware that we require them to operate their businesses within the provisions of the <a href="#">Human Trafficking and Exploitation (Scotland) Act 2015</a> .	
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## DEFINITIONS

One definition of Modern Slavery with a worldwide context from **Anti-slavery International**

‘Modern slavery takes many forms. The most common are:

- **Human trafficking.** The use of violence, threats or coercion to transport, recruit or harbour people in order to exploit them for purposes such as forced prostitution, labour, criminality, marriage or organ removal
- **Forced labour.** Any work or services people are forced to do against their will, usually under threat of punishment
- **Debt bondage/bonded labour.** The world’s most widespread form of slavery. People trapped in poverty borrow money and are forced to work to pay off the debt, losing control over both their employment conditions and the debt
- **Descent-based slavery (where people are born into slavery).** A very old form of slavery, where people are treated as property, and their “slave” status has been passed down the maternal line.
- **Child slavery.** When a child is exploited for someone else’s gain. This can include child trafficking, child soldiers, child marriage and child domestic slavery
- **Forced and early marriage.** When someone is married against their will and cannot leave. Most child marriages can be considered slavery
- **Domestic servitude.** Domestic work and domestic servitude are not always slavery, and when properly regulated can be an important source of income for many people. However, when someone is working in another person’s home, they may be particularly vulnerable to abuses, exploitation, and slavery, as they might be hidden from sight and lack legal protection.’

(source - Antislavery International – [www.antislavery.org](http://www.antislavery.org), 12 December 2022)

A second definition with specific relevance to the UK is from the **Metropolitan Police** (London).

‘Modern slavery is a serious crime. Victims are exploited, controlled or held captive and /or threatened or punished to stop them escaping or reporting the crime.

Anyone can be a target for modern slavery. But some people can be at more risk because of money, social or health issues, or because of their age or immigration status. Threats and punishments can often be violent, but not always. They can include threatening to tell the authorities about the victim's immigration status in order to get them deported from the country. Modern slavery includes human trafficking. This is when victims are taken between countries or around a country so they can be exploited.

### How criminals exploit their victims

**Forced labour** - Forced labour is when victims are threatened or physically forced into working in someone's home or business. Criminals might also trick their victims by promising real work in

another place or country, then forcing them into slavery once they arrive. Even if a victim seemingly agrees to the work, we can still prosecute if the work and conditions aren't acceptable. Nobody can agree to being exploited. Victims can work very long hours for little or no pay. They are often kept and work in terrible conditions. But it is still modern slavery if the victim is kept in decent conditions but is not free to leave or live their lives as they want.

Victims can be forced to do any kind of commercial work. Common examples include:

- on a fishing boat
- in fields
- as a builder
- in a hotel
- in a factory
- as a cleaner in an office or shop

But they can also be forced to work in people's homes, cooking and cleaning as domestic slaves.

**Criminal exploitation** is when victims are made to commit crimes like:

- shoplifting
- pickpocketing
- stealing fuel from cars
- benefit fraud

**Drugs** - Some victims in the drug trade are forced to work as cannabis growers. Others are used to distribute or sell drugs. County lines is one form of criminal exploitation. This is where vulnerable people, often children, are used to carry drugs from cities to sell them in nearby towns and the countryside.

**Sexual exploitation** - Victims are forced into sex work or to perform sexual acts against their wishes and without their consent. This includes escort work, pornography or making indecent images of children. Most victims of sexual exploitation are women and children, but men can also be affected.

**Organ trafficking** - Victims are moved from one place to another so they can have their body parts removed. These are then sold for surgical transplants. Body parts include tissues and organs, for example, kidneys.

#### Spotting modern slavery

Modern slavery can happen anywhere in any situation. Each case is different and may not fit the stereotype of groups of people being forced to work in fields or on fishing boats. The signs of forced labour, and criminal or sexual exploitation can be very different. Victims might look helpless and afraid, but they can also seem to accept their situation, be completely unaware of it, or even defend the people who are exploiting them.

(source – Metropolitan Police website [www.met.police.uk](http://www.met.police.uk) 12 December 2022)

#### **FURTHER READING (LINKS)**

Report and Case Study [Modern-Slavery-in-Scotland.pdf \(unseenuk.org\)](#)

Leaflet from Scottish Government with reporting and helpline telephone numbers  
[Human+Trafficking+Aide+Memoire.pdf \(www.gov.scot\)](#)

Document ends sw 12DEC2022

Reviewed 21/11/2023