

Modern Slavery Policy

Initial Version	Latest Version	Version Number	Review
09 Nov 23	09 Nov 23	1	Following legislation changes or annually

Author
Tel Folkman

Approval status	Approved By
Approved	Charlie Puddefoot

Data Classification
Horus Official S-C

Document Type	Document Location
Word	Z:\Groups\Operations\Consultancy\ISO27001\Horus Policies

1. Policy Statement

This policy is published in accordance with Section 54 of the Modern Slavery Act 2015 Act and the Modern Slavery Act 2015 (Transparency in Supply Chains) Regulation 2015 (the “Act”). It sets out the steps taken by Horus Security Consultancy Limited (Horus), to prevent modern slavery and human trafficking in its business and supply chain.

Horus fully supports the Government’s objectives to eradicate modern slavery and human trafficking and recognises the significant role it can play in both combatting modern slavery and supporting victims. In particular, Horus are strongly committed to ensuring its supply chain and business activities are free from ethical and labour standards abuses.

Horus recognises that being in the security industry and specifically in the pre-employment screening sector, it is exposed to and may identify risks relating to the potential violation of human rights in areas including modern slavery and human trafficking. Horus is conscious that such risks can arise in certain areas of the security industry and may be widespread within the construction industry, where Horus is involved in high levels of pre-employment screening. Horus is committed to monitoring such risks in its business, and in its wider supply chain, and to mitigating them.

2. People

Horus promotes a workplace environment that is fair, open and respectful, and one that protects the rights and dignity of all employees. Horus operates people practices and contracts of employment that are lawful and aligned to the Horus code and values.

Horus confirms the identities of all new employees, contractors and temporary workers, and their right to work in the United Kingdom. Horus pays all its employees, regardless of status, above the National Living Wage

Additionally, Horus’ Public Interest Disclosure (Whistleblowing) Policy gives a platform for employees to raise concerns about poor working practices.

Horus invests in training to ensure staff are aware of and able to identify and respond to incidents of modern slavery.

3. Whistleblowing

The Horus whistleblowing policy sets out Horus’ commitment to ensure staff are free to question things and raise anything they are concerned about and specifically modern slavery and human trafficking. Horus encourages staff to speak up by raising matters with their line manager.

4. Procurement and Supply Chain

The Horus due diligence process includes a modern slavery assessment.

Additionally, when procuring goods and services, Horus applies specific Terms and Conditions that require suppliers to comply with relevant legislation.

5. Review of Effectiveness

Horus intends to take further steps to identify, assess and monitor potential risk areas in terms of modern slavery and human trafficking, particularly in its supply chain.

In 2023/24, the Horus anti-slavery programme will also:

- Continue to support all staff to understand the impact that each and every individual, working in the security industry, can have in keeping present and potential future victims of modern slavery and human trafficking safe.
- Ensure that staff have access to training on how to identify those who are victims of modern slavery and human trafficking.
- Review Horus' safeguarding policies and training programmes to ensure that modern slavery and human trafficking reflect potential requirements in pending reforms relating to the pre-criminal needs of people involved in human trafficking and modern slavery.
- Undertake a risk assessment on transparency in supply chain including an overview of products, services and suppliers procured.