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Education

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MODERN SLAVERY POLICY STATEMENT

Modern Day Slavery Policy

The Modern Slavery Act (MSA) 2015 covers four main activities:

1. Slavery: Exercising powers of ownership over a person.
2. Servitude: The obligation to provide services is imposed by the use of coercion
3. Forced or compulsory labour: Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily
4. Human trafficking: Arranging or facilitating the travel of another person with a view to their exploitation.

This policy covers all four activities.

The MSA 2015 recognises the important part businesses can and should play in tackling modern day slavery and encourages them to do more, bearing this in mind, MCC tries to pay particularly close attention to our supply chain, especially those areas which have historically proven to be at risk. This includes but not limited to outsourced activities, such as cleaning and waste management. Short term hire of low skilled labour and sourcing of raw materials from certain locations in the world.

MCC has responsibilities to ensure fellow workers are safeguarded, treated fairly and with dignity, and it is up to everyone to observe this Policy. MCC is committed to maintaining clear policies and procedures preventing exploitation and human trafficking. Transparency about our recruitment policy. Regularly Examining our supply chains and be clear with key suppliers about our Modern Day Slavery Policy. Finally MCC aims to lead by example by making appropriate checks on all employees, recruitment agencies, suppliers, etc to ensure we know who is working for us.



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MCC will seek to ensure we have in place an open and transparent grievance process for all staff. Managers will be given additional training so that they listen and are approachable to colleagues, that they respond appropriately if they are told something that might indicate a colleague is in an exploitative situation and remain alert to indicators of slavery.

MCC will raise the awareness throughout the organisation and ensure all employees are provided a copy of this policy and be aware of their responsibilities, so that they can use their experience and professional judgement to gauge situations. Regardless of seniority, everyone must keep their eyes and ears open. If it is suspected that someone (a colleague or someone in our supply chain) is being controlled or forced by someone else to work or provide services, they should follow our reporting procedure.

MCC takes its responsibilities to its employees, people working within our supply chain and our clients seriously, and this policy is updated annually. We apply reasonable due diligence to risk assessing our supply chain and use the following mechanisms to do so:

- (1) Supplier mapping initially performed on spend level and then industry sector to identify key vulnerabilities.
- (2) Risk Assessment of spend areas in relation to the supply chain and their propensity of historically proven risk.
- (3) Training and knowledge sharing for key Procurement.
- (4) Ensuring all suppliers deemed “at risk” are fully supportive to the aims of this policy.

If any issues are identified then this is escalated to the directors of the business, with all methods of remediation to be available including exiting the relationship with the supplier.

Recruitment obviously requires special close attention, so MCC is committed to only using agreed specified reputable recruitment agencies. i.e. ones who fully comply with the Modern Anti-Slavery Act 2015, are free from ethical ambiguities and are transparent, accountable and auditable. This list of approved agencies should be kept under regular review and if there are any suspicions that any of these agencies are falling short of these standards then the matter should be reported immediately to a director.



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MCC will always ensure all staff have a written contract of employment, and ensure all staff are legally able to work in the UK. MCC provides information to all new recruits on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to. If, through our recruitment process, we suspect someone is being exploited, then again our reporting procedures should be followed.

MCC recognises that identifying slavery is very hard as there is no typical victim and some victims do not understand they have been exploited and are entitled to help and support. However, MCC has highlighted the following key signs as indicators that someone may be a slavery or trafficking victim:

- (1) The person is not in possession of their own passport, identification or travel documents.
- (2) The person is acting as though they are being instructed or coached by someone else.
- (3) They allow others to speak for them when spoken to directly.
- (4) They are dropped off and collected from work.
- (5) The person is withdrawn and may appear frightened.
- (6) The person does not seem to be able to contact friends or family freely.
- (7) The person has limited social interaction or contact with people outside their immediate environment.

MCC recognises that this list is not exhaustive, and conversely a person may display a number of the trafficking indicators set out above but they may not necessarily be a victim of slavery or trafficking. It is important to build up a picture of the person's circumstances to establish that something is not quite right. As always if there is a suspicion, the matter should be reported to a director without delay.