

## **Modern Slavery Act 2015**

### **Modern slavery and human trafficking statement**

#### **1. Introduction**

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

ICAB (The Company) is committed to the eradication of slavery and human trafficking in the modern age, the company ensures that its business operations and supply of service are carried out in accordance and compliance with the relevant laws, in doing so we strongly endorse the implementation and promotion of ethical and transparent practices to protect workers from abuse and/or exploitation.

The Company operates across the UK and Northern Ireland regions and is committed to ensure only suppliers that are equally committed to the eradication of slavery and exploitation of individuals form part of its supply chain operations where possible.

**This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 30 April 2019**

#### **2. Organisational structure**

We are a provider of Alternative Accommodation in the Insurance and Housing Sectors.

The Company referred to in this statement relates to ICAB Ltd and its undertaking ICAB Pods Ltd.

#### **3. The Company and its Supply Chain**

Our supply chains include:

- Hotels
- Serviced Apartment providers
- Rental Agents
- Furniture and Removal/Storage companies
- Caravan and other alternative accommodation providers

ICAB operate predominantly in the supply of Alternative Accommodation to the Insurance and Housing markets, whilst the company forms a vital part in the service provision to claimants, it does not undertake the use of factories, building or other entities normally associated with slavery or forced labor.

ICAB enlists the services of various hotel and accommodation providers across the national territories, it does not operate outside of the UK, however, the Company will where operationally possible ensure all suppliers adhere to the current legislation and adopt a strategy to eradicate slavery and or exploitation of workers. The Company where possible ensure all suppliers agree to our principals through written contracts and standard booking agreements. The Company will continue to strengthen its controls and will ensure any serious violations to the legislation reported against any of its existing suppliers will result in the immediate termination of contract or use within the supply chain.

#### **4. Notification of Suspicious Activity**

The company fully encourages all its workers, suppliers, customers and business partners to report any concerns related to its direct activities or that of its supply chain to a Director or where applicable through external reporting channels such as the Modern Slavery Helpline 08000 121 700 without fear of repercussion.

#### **5. Human Resource and Recruitment**

The Company ensures only reputable employment agencies are enlisted to source labour after relevant vetting protocols.

The Company operates under a framework within its recruitment process to validate the employee's rights to work and are therefore ensure they are protected under all relevant legislation, employees are provided with awareness through induction training, policy and ongoing awareness training throughout their employment, the Company encourages employees to report any suspected or known violations through the outlined procedures without fear or repercussion.

The Company and its associated subsidiaries do not employ individuals that would be considered to be 'child workers'. Young and inexperienced workers may be employed or given work experience only under prescribed terms of contract and will be subject to the rights and protections afforded to all workers

#### **6. Basic Rights of Employees**

The company is committed to ensuring the rights to workers are upheld within all its operations to include any associated companies and throughout its supply chain, these rights include but are not limited to;

1. The right to a reasonable wage
2. The right to a safe working environment
3. The right to an appropriate level of holiday and cover for period of sickness
4. The freedom to complain without repercussion should they believe that they are not being fairly treated or have any other concerns.

#### **7. Social Responsibility**

Over the last 20 years the Company has grown significantly, at the forefront of the Companies ethos has always been the understanding of its social and corporate responsibility to not only individuals and associated businesses but also to its internal and external environments. The Company maintains its approach to ethical and transparent business through its operations and across all business dealings, ensuring certain social and corporate standards are imbedded in its operations that protect the rights of individuals and its wider environments with complete adherence to all relevant legislation

#### **8. DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

As part of our initiative to identify and mitigate risk we have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

## 9. Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff. We also require our business partners to provide training to their staff and suppliers and providers.

## 10. Our effectiveness in combating slavery and human trafficking

We use the following measures to review how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Zero tolerance approach with immediate termination of contract or services from suppliers who are subject to a violation or reported incident in regards to Modern Slavery
- Supplier review of policies on Modern Slavery
- Bi-annual or annual review meetings

## 11. Further steps

Following a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains, The Company is fully committed to ensure an environment of continual improvement in the processes, policies and business dealings for the identifying, reporting and adherence to our principals of Modern Slavery throughout our business activities and those of our supply chain.

Approved on behalf of The Company by:

Name: J. GOODMAN

Position: DIRECTOR

Signature: 

Date: 20/5/18