



## Human Trafficking and Slavery Policy

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Reviewed: Rebecca Freeman 03/09/2025

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## **Anti-Slavery & Human Trafficking Policy**

This policy applies to all sectors under **illuminate AP**. Violations of fundamental human rights, such as slavery, servitude, forced and compulsory labour, sexual exploitation, and human trafficking ("modern slavery"), are crimes that deprive individuals of their liberty for personal or commercial gain.

**illuminate AP** has a strict zero-tolerance approach to modern slavery across its operations and supply chains.

### **Scope of the Policy**

This policy applies to everyone working for **illuminate AP**, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, apprentices, and contractors. It also applies to external consultants, agencies, third-party representatives, business partners, and our supply chain ("Suppliers").

### **Commitment**

**illuminate AP** is committed to:

- Acting ethically and with integrity in all business dealings.
- Implementing and enforcing effective systems and controls to prevent modern slavery within the organisation and its supply chains.
- Ensuring transparency in tackling modern slavery through business practices.

We expect the same high standards from all our Suppliers. As part of the contracting process, we include prohibitions against modern slavery and expect Suppliers to enforce similar standards throughout their own supply chains.

### **Identifying Modern Slavery**

Modern slavery can occur within:

- Our organisation.
- Our supply chains.
- Outsourced activities, particularly in regions that lack sufficient safeguards against modern slavery.

There is no single profile for a victim of modern slavery, and victims may not recognize that they are being exploited. However, the following are some key indicators that may suggest a person is a victim of modern slavery or trafficking:

- The person does not have control over their passport, identification, or travel documents.
- The person appears to be instructed or coached by someone else.
- Someone speaks for the person when they are directly addressed.
- The person is regularly dropped off and collected from work by someone else.
- The person appears withdrawn, frightened, or lacks freedom of movement.
- The person does not seem to have free contact with friends or family.
- The person has limited social interaction outside of their immediate environment.

This list is not exhaustive. A person may show multiple indicators and may or may not be a victim of modern slavery or trafficking.

## **County Lines**

County Lines is a form of criminal exploitation, often linked with other forms of abuse. It can cause serious physical and emotional harm to young people.

### **Criminalisation**

If professionals working with children do not recognise County Lines as a form of abuse, they may view children involved in County Lines activity as criminals rather than victims. This misunderstanding can prevent children from receiving necessary safeguarding support and protection. Perpetrators may lure young people into gang activity by using drugs or alcohol, often leading them into "debt bondage," where they must repay drug debts through further criminal exploitation.

### **Physical Violence**

County lines activity has strong links to:

- Serious violence, including knife and gun crime.
- The use of substances like acid as weapons.
- Homicide (Home Office, 2018).

Conflict between rival gangs vying for control over territories can lead to serious injury or death, especially for young people caught in the wrong place at the wrong time.

The fear of retaliation through serious physical violence—often in response to "snitching" or "grassing"—is one of the factors preventing young people from leaving gangs or seeking help from the authorities.

### **Sexual Abuse and Exploitation**

In addition to using young people to transport drugs, county line gangs may also sexually abuse and exploit children of any gender (National Crime Agency, 2018).

This can take place in various ways, such as:

- Forcing young people into sexual activity with gang members or for the gang's financial gain.
- Coercing vulnerable children into paying off drug debts through sexual exploitation, often after being made dependent on drugs.
- Grooming children into what they believe is a romantic relationship, which then leads to exploitation (National Crime Agency, 2018).

Some children may be forced to transport drugs in dangerous and invasive ways. This includes swallowing bags of drugs, which can be life-threatening, or inserting them into their rectum or vagina ("plugging"), a practice that can cause serious harm or death (Ofsted et al., 2018).

### **Trafficking and Missing Children**

Young people involved in county lines activity may be trafficked far away from home, staying in unfamiliar and often unsuitable locations such as short-term holiday lets or budget hotels. They may go missing for extended periods as a result of this exploitation.

### **Cuckooing**

Cuckooing occurs when a county line gang takes control of a vulnerable adult's home, using it as a base to deal drugs. Vulnerable adults may have substance misuse or mental health issues, be elderly or disabled, or be in debt to the gang, making them easier to exploit and control.

Children may be forced to stay in these "cuckooed" addresses for extended periods to deal drugs, often being on-call 24 hours a day. These locations are sometimes referred to as "bando" or "spot" by gangs (Thurrock Council, 2020).

### **Financial Exploitation and Abuse**

County lines gangs often launder drug money through children's bank accounts, either by using an existing account or coercing the child into opening a new one. This process is referred to as using "squares" (cash cards) and "deets" (bank details) (Safe4Me, 2019).

### **Responsibility for this Policy and Compliance**

The board of directors holds overall responsibility for ensuring that this policy meets the company's legal and ethical obligations.

The legal team has primary responsibility for implementing this policy and addressing any queries regarding it.

All **illuminate AP** staff and suppliers must comply with this policy.

### **Reporting Modern Slavery**

**illuminate AP** staff and suppliers are required to report any instance or suspicion of the activities mentioned in this document as soon as possible to:

- Your line manager (if you are an **illuminate AP** staff member).
- Your primary account manager or business contact (if you are a supplier).

### **Publication of this Policy**

This policy, along with training resources on these issues, is available to all **illuminate AP** staff and suppliers upon request.

### **Breaches of this Policy**

Any **illuminate AP** staff member found to be in breach of this policy may face disciplinary action, which could lead to dismissal for misconduct or gross misconduct.

**illuminate AP** reserves the right to terminate its relationship with any supplier found in

violation of this policy. Alternatively, **illuminate AP** may choose to work with the supplier to address and resolve the issue.

### **Policy Review**

The Management Team is responsible for reviewing this policy as required to ensure it remains compliant with legal and ethical standards and reflects best practice.

This policy does not form part of any employment contract and may be revised or amended at any time.

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