



**Independent Commission
for Reconciliation and
Information Recovery**

Modern Slavery Policy

December 2023

Principles

This policy is based on the Modern Slavery Act 2015, which makes provision about slavery, servitude and forced or compulsory labour and about human trafficking, including provision for the protection of victims; to make provision for an Independent Anti-slavery Commissioner; and for connected purposes.

Commercial policy

The Modern Slavery Act 2015 is actively embraced by the Independent Commission for Reconciliation and Information Recovery (ICRIR) with tenders and contracts including strong obligations regarding compliance with modern slavery legislation. ICRIR also actively deploys the provisions under section 54 (Transparency in Supply Chains etc) of the Act to require large businesses to report on the steps they have taken to tackle modern slavery in their operations and global supply chains.

The [Policy Procurement Note \(PPN\) 02/23](#) and modern slavery procurement guidance is the principal framework we use to inform how we identify and mitigate modern slavery risks in our supply chains. This guidance is based on the UN Guiding Principles on Business and Human Rights.

The guidance sets out the steps we must take to identify and mitigate modern slavery risks throughout the commercial life cycle, from defining contract requirements and procuring goods, to managing supplier relationships and remediation where exploitation has been uncovered.

HR policy

Due to our comprehensive policies and processes for employing staff across ICRIR, we consider the risk of slavery, including forced labour, to be very low in our directly employed workforce. The policies are based on the following principles and expectations of conduct:

- ICRIR's values and behaviours are set out in the ICRIR [Code of Conduct](#) including references to ICRIR's **Raising a concern** policy (incorporating whistleblowing).
- Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion. We do not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour."
- A full suite of HR policies is in place to support our workforce and to ensure processes are clear and transparent for staff to raise concerns if needed.
- Providing safe / hygienic working conditions – we are committed to providing a safe working environment for all our staff. We have a range of policies and procedures in

place covering building safety, staff safety and contractors. We have specific reporting tools in place to enable people to report an accident or incident should the need arise, and we adhere to current health and safety legislation.

- Child labour shall not be used – ICRIR do not employ anyone under the age of 16, although occasional placements (usually lasting two weeks) for school pupils may be accepted.
- Living wages are paid – our lowest paid salary range is above the [living wage](#).
- ICRIR has a Raising a concern policy which allows employees, contractors, consultants, and agency workers to raise concerns they may have about wrongdoing, an example of which could be Modern Slavery.

Social Values

ICRIR ensures that wider Government policies are actively being implemented into their business and commercial processes. This includes [Procurement Policy Note 06/20](#) which relates to Social Value. The Commercial Team works to apply social value requirements to frameworks, calls offs and direct awards as well as reinforcing strong messages around how we can achieve added social value beyond that which we are buying. This includes consideration on how social value requirements in contracts can support the fight against Modern Slavery.