# **Duncan Private Hire, Slavery and Human Trafficking Statement**

#### ORGANISATIONAL STRUCTURE

- 1. The organisational structure of Duncan Private Hire and Swindon School and Welfare Transport (SSWT).
- 2. The business is controlled by a Director. The business Head Office is located in Swindon, with other offices located in, Melksham.
- 3. The business is predominately involved in the provision of Passenger Transport for both wheelchair and able bodied users. It offers a daily service for which demand is consistent throughout the year.

#### **DEFINITIONS**

The business considers that modern slavery encompasses:

- 1. Human trafficking;
- 2. Forced work, through mental or physical threat;
- 3. Being owned or controlled by an employer through mental or physical abuse or the threat of abuse:
- 4. Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restriction placed on freedom of movement.

#### COMMITMENT

- The business acknowledges its responsibilities under the Modern Slavery Act 2015 and is committed to preventing slavery and human trafficking within its own businesses and in its supply chains. The business understands that this requires an ongoing review of both its internal practices in relation to its labour force and its supply chains.
- 2. The business has a zero tolerance policy towards modern slavery. It will refrain from entering into business, and/or will discontinue any current business with any other organisation which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

- 3. The labour supplied to the business in pursuance of the services it provides is carried out wholly in the countries where those services are provided i.e. United Kingdom, as appropriate.
- 4. No labour provided to the business in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The business strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom, as appropriate, and in many cases exceeds those minimums in relation to its employees.

### POTENTIAL EXPOSURE

- The business considers its exposure to modern slavery to be limited.
   Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.
- 2. In the operation of its business, the business's main supply chains are those related to the provision of services. The business considers its main exposure to the risk of slavery and human trafficking to exist in its supply chains.

#### **STEPS**

- 1. The business carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its working environment.
- 2. The business has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with slavery and/or human trafficking.
- 3. The business has taken action to monitor reports of modern slavery. The business will seek to discontinue business with any partner business found by the enforcement authorities to be involved in modern slavery.
- 4. The business encourages use of its whistleblowing policy to report any concerns regarding modern slavery and will investigate any complaints thoroughly.

## ASSESSMENT OF EFFECTIVENESS IN COMBATTING MODERN SLAVERY

To ensure effectiveness in combatting modern slavery, the business maintains an accurate supplier list including contact details. It will ensure action is taken in response to reports of modern slavery and any complaints made via the whistleblowing policy will be responded to in accordance with the policy.

#### **POLICIES**

The business maintains a working set of policies which further defines its stance on modern slavery. In addition, a Whistleblowing policy is in place which encourages the reporting of any wrongdoing which is in the public interest.

#### **BUSINESS COMPLIANCE MANAGER**

The business has a business Compliance Officer, to whom all concerns regarding modern slavery should be addressed. The Business Compliance Manager will undertake an annual review of the Business's obligations towards eradicating modern slavery within its organisation and supply chains.

The Business also provides training on awareness of modern slavery to those within the organisation who have been identified as having responsibilities in this regard.

#### **REVIEW**

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2010 and applies to all companies within and associated to Duncan Private Hire. It will be reviewed for each financial year.

This statement relates to the 2022/2023 financial year and is approved by:

Peter Simpson, Business Director.

Clark Ferguson, Business Transport Manager.