

**GEOAmey**  
**Modern Slavery and Human Trafficking Statement**  
**Financial Year Ending 31 December 2021**

**Introduction**

The Modern Slavery Act 2015 (“the Act”) came into force in October 2015. This Act requires GEOAmey to state publically the steps that have been taken during the financial year to ensure that slavery and human trafficking is not taking place in any part of its business or any of its supply chains.

The statement is approved by the GEOAmey Executive Board, signed by the Managing Director and published on the GEOAmey website

**1. Purpose**

The purpose of the statement is to clearly outline GEOAmey’s steps taken to prevent modern slavery and human trafficking within our business and our supply chain. This is written in accordance with Section 54 of the Modern Slavery Act 2015.

**2. Introduction**

GEOAmey is a limited company owned by GEO Group (50%) and Amey (50%)

Having been established since 2011, GEOAmey works within the Criminal Justice sector specialising in the provision of Prisoner Escorting and Custodial Services on behalf of the Ministry of Justice and the Scottish Prison Service and Criminal Justice Partners. Operating two distinct contracts (PECS and SCCPES) the organisation provides its services across England, Wales and Scotland with contract specific operating models supported by its central support function resources.

GEOAmey has strong relationships with its recognised trade unions who support and bargain on behalf of the collective bargaining units covering all employees certified as Prisoner Custody Officers.

GEOAmey’s business is not seasonal.

**3. Policy Statement**

3.1 The GEOAmey values, code of conduct and policies set out the behaviour we expect from all employees and supply chain partners with all new suppliers being approved by the Finance & Commercial Director or Head of Finance.

Company policies are subject to regular review and governance by our policy committee comprising representatives from Compliance, HR, Operations and other subject matter experts, as appropriate. In addition Trade Union involvement and input is sought.

Policy communication is via the company intranet, regular local bulletins, updates and briefings delivered at each site, supplemented by Monthly newsletters and a quarterly company magazine.

3.2 Modern Slavery is a crime and a violation of an individual's human rights. It takes various forms such as slavery, servitude, forced or compulsory labour and human trafficking all of which have one thing in common; the deprivation of a person's freedom by another in order to exploit them for personal or commercial gain. GEOAmeY has a zero tolerance approach to slavery, with the resultant responsibility to act ethically and with integrity in all of our business ventures, and to establish and enforce effective systems to ensure modern slavery is not taking place anywhere in the business or our supply chains.

3.3 We are dedicated to ensuring there is transparency in the GEOAmeY business and in our approach to tackling modern slavery throughout our supply chains, consistent with the Modern Slavery Act 2015. We expect the same standards from all of our contractors, suppliers and strategic partners including specific prohibitions concerning modern slavery. GEOAmeY's response is to work closely within the supply chain to improve performance standards, establish strategic relationships with reputable suppliers and undertake periodic contractual reviews. The majority of our supplier relationships pre-date contract award, include involvement in our bid processes and agreement to overarching contractual commitments on Modern Slavery and Human Trafficking Statement.

3.4 GEOAmeY assesses compliance within its existing supply chain and will require supplier assurance of compliance with the following criteria:

- No forced labour or human trafficking is practised and employment is freely chosen
- Working conditions are safe and hygienic
- Working hours are not excessive
- A fair wage is paid
- No child labour is exploited
- No harsh, cruel or degrading practices are allowed
- No discrimination is practised

A failure to comply with the above is an absolute bar to pre-qualification as a supplier.

3.5 We source from a variety of suppliers with global supply chains however GEOAmeY use best endeavours for our Scotland operation to primarily source from Scottish suppliers.

We have long term supplier relationships and our payment terms are 30 days as standard. Our business is not seasonal and therefore fluctuations in demand are avoided, which could place demands on suppliers that lead them to violate human rights by requiring rapid increase in labour or supply or inability to manage cash flow and therefore payment to their employees. During the COVID pandemic, suppliers were pro-actively approached to identify any cash flow challenges for which GEOAmeY could offer support.

We have implemented a new questionnaire for suppliers requiring them to make declarations and to audit their supply chains to provide assurance to GEOAmeY that their supply chains adhere to our standards and strategy on Modern Slavery and Human Trafficking

3.6 We perform quarterly checks on employees address and bank details to assure ourselves that we do not have multiple employees living at the same address or being paid into the same bank account typically considered as indicators of concern.

New officers receive a 6 week initial training course and Modern Slavery is covered as part of this training alongside mandatory E-Learning for non-officers.

3.7 Our business practices, performance incentives and performance indicators are designed to deliver enhanced care and welfare and to embed and engender behaviours designed to protect those who are vulnerable.

#### **4. The scope of the Modern Slavery policy statement**

4.1 This policy applies to all employees, part or full time employees, temporary staff and contractors working as a third party acting on our behalf in any capacity, does not form part of employees Terms and conditions and may be amended at any time.

#### **5. Responsibility for the policy**

5.1 The Managing Director reports to the GEOAmeY Board of Directors and has the overall responsibility for ensuring this policy is compliant with our legal and ethical obligations

5.2 GEOAmeY's Human Resource department work closely with the procurement team having accountability for implementing this policy, monitoring its use and effectiveness and dealing with queries to ensure they are effective in countering modern slavery.

5.3 Management at all levels are responsible for ensuring those reporting to into them understand and comply with the Modern Slavery policy.

#### **6. Compliance with this policy**

6.1 All employees must ensure that they have understood and comply with this policy to prevent, detect or report modern slavery in any part of the GEOAmeY business or supply chain

6.2 All GEOAmeY employees are required to avoid any activity that might lead to, or suggest a breach of this policy.

6.3 All GEOAmeY employees are expected to report as soon as possible:

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- Knowledge or suspicion of any form of modern slavery occurring in any part of the business
- Knowledge or suspicion of a breach of this policy; this should be raised with the employee's line manager, a member of the HR or compliance team or, if this is difficult, to the whistleblowing helpline

6.4 If at any time employees are unsure of a particular act i.e. the treatment of workers more generally or their working conditions and feel it may constitute one of the multiple forms of modern slavery, they should raise this through their line manager or a member of the HR or compliance department.

6.5 As a business GEOAmeY encourages openness and will support any colleague who raises genuine concerns under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting their suspicion

that modern slavery is, or may be taking place, in any part of the business or in any of GEOAmeys supply chain.

## **7. Communication and Awareness of this Policy**

As part of GEOAmeys commitment to eradicating modern slavery, we will continue to ensure all employees fully understand what is meant by modern slavery, understand how to recognise it and how to act in the event that they consider somebody is a potential victim of modern slavery.

## **8. Recruitment and Training**

GEOAmeys employs c.2,200 employees within the UK. We undertake pre-employment screening for all employees, comprising advanced vetting and DBS checks, identity checks and confirmation of entitlement to work in the UK, prior to commencing employment with us. On joining, each employee receives an induction which covers the essential policies, procedures and related information. We operate a clear employee code of conduct and an externally operated confidential whistleblowing line. Additionally, within this financial year we have introduced support via; a cohort of Mental health First Aiders, mental health and stress awareness training as well as Diversity, bullying and harassment campaigns, as part of our ongoing wellbeing strategy

All employees have, within this financial year, been appraised of all personal data held about them (including address, bank details, next of kin) to enable robust internal audit relating to Modern Slavery

## **9. Breaches of this Policy**

Non-compliance with this policy by any employees may result in a disciplinary action up to and including summary dismissal.

## **10. Further Information**

If you have any further queries regarding this policy please contact a member of the Human Resource department on 01454 285 560 or e-mail [HR@geoamey.co.uk](mailto:HR@geoamey.co.uk)

## **11. Further Steps**

Our measures to combat Modern Slavery are in constant review.

This statement is made pursuant to section 54 (i) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2021.

David Jones  
Managing Director