

TUK Modern Slavery and Human Trafficking Policy

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Translate UK Ltd Modern Slavery and Human Trafficking Policy

Effective Date: 17 June 2026

1. Introduction

Translate UK Ltd is committed to preventing modern slavery, human trafficking, forced labour and exploitation in all areas of its business, workforce arrangements and supply chain. This Policy sets out the organisation's expectations, responsibilities and controls for identifying, preventing and responding to modern slavery risks.

This Policy supports compliance with the Modern Slavery Act 2015 and applies to all employees, workers, freelance interpreters and translators, contractors, consultants, suppliers and service providers acting on behalf of or providing services to Translate UK Ltd.

2. Definitions

Term	Meaning
Modern slavery	Situations of exploitation where a person cannot refuse or leave because of threats, violence, coercion, deception or abuse of power.
Human trafficking	The recruitment, movement, transfer, harbouring or receipt of people by improper means for the purpose of exploitation.
Forced or compulsory labour	Work or services extracted from a person under threat, penalty, coercion or deception, where the person has not offered themselves voluntarily.
Servitude	A condition where a person is required to live and work under the control of another person and cannot freely change their situation.
Exploitation	Abuse of vulnerability, power or trust for another person's benefit, including labour exploitation, criminal exploitation or other forms of coercive control.

3. Scope

This Policy applies across Translate UK Ltd's operations, including interpreting, translation and language support services delivered to public sector, private sector and commercial clients across the United Kingdom.

It applies to:

- Employees.



- Freelance interpreters and translators.
- Contractors and consultants.
- Approved suppliers and service providers.

It also applies to supply chain relationships including:

- Freelance language professionals.
- IT and technology suppliers.
- Professional service providers.

4. Policy Statement and Governance

Translate UK Ltd has zero tolerance of modern slavery, human trafficking, forced labour, servitude and exploitation. We expect the same standards from everyone who works for us or with us, including suppliers and subcontractors.

- Modern Slavery and Human Trafficking Policy.
- Safeguarding Policy.
- Whistleblowing Policy.
- Recruitment and Selection Procedures.
- Code of Conduct.
- Supplier Due Diligence Process.
- Equality, Diversity and Inclusion Policy.
- Data Protection and Confidentiality Policies.

Responsibility for overseeing this Policy rests with the Directors and Compliance Team. Managers are responsible for ensuring that relevant teams understand and follow this Policy, and all individuals covered by the Policy are expected to report concerns promptly.

Responsibilities

Role	Responsibility
Directors	Approve this Policy, set expectations for ethical conduct, ensure appropriate resources are available, and maintain overall accountability for modern slavery prevention.
Compliance Team	Maintain the Policy, coordinate reviews, support risk assessment activity, monitor controls, retain records and escalate concerns where required.
Managers	Ensure team members understand the Policy, follow recruitment and supplier controls, identify warning signs and report concerns promptly.
Employees, workers and freelancers	Comply with this Policy, act ethically, complete required checks or training, and report any suspected modern slavery or exploitation concerns.



Suppliers and service providers	Comply with applicable legal and contractual requirements, maintain fair working practices, cooperate with due diligence checks and report concerns or breaches.
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5. Prohibited Conduct

Translate UK Ltd prohibits any conduct that may contribute to modern slavery, human trafficking, forced labour, servitude or exploitation. No person working for or with Translate UK may knowingly permit, encourage or engage in practices including:

- Use of forced, bonded, compulsory or trafficked labour.
- Charging workers recruitment fees or requiring payment to secure work.
- Withholding wages, identity documents, passports or personal documents.
- Restricting freedom of movement or preventing a person from leaving work.
- Using threats, intimidation, deception, coercion or abuse of vulnerability.
- Using suppliers, subcontractors or intermediaries where there is a known or suspected risk of exploitation and no appropriate mitigating action has been taken.

6. Risk Assessment and Risk Areas

Translate UK recognises that the language services sector relies heavily on freelance workers and subcontracted service providers.

The following areas may present increased risk and must be monitored proportionately:

- Engagement of self-employed interpreters and translators.
- Recruitment through third-party agencies.
- Overseas service providers.
- Right to Work verification processes.
- Identity verification processes.
- Vulnerable individuals involved in interpreting assignments.

The overall risk of modern slavery within our direct workforce is considered low; however, ongoing monitoring remains necessary due to the nature of freelance, subcontracted and supplier-based working arrangements.

7. Due Diligence and Controls

Translate UK Ltd will maintain proportionate controls to reduce the risk of modern slavery within its operations and supply chain. These controls include:

Workforce Verification

- Verification of identity documents.
- Right to Work checks where required.
- Verification of professional qualifications.
- Verification of DBS and security clearance requirements where applicable.



- Independent verification of bank account ownership where necessary.

Supplier Due Diligence

- Assessment of supplier compliance procedures.
- Review of supplier policies where appropriate.
- Inclusion of contractual obligations requiring compliance with the Modern Slavery Act 2015 (where appropriate).
- Monitoring of supplier performance and conduct.

Supplier Expectations

- Suppliers must comply with applicable modern slavery, labour, employment and safeguarding laws.
- Suppliers must maintain fair recruitment, payment and working practices.
- Suppliers must not use forced, bonded, trafficked or exploitative labour.
- Suppliers must notify Translate UK promptly of any actual or suspected modern slavery concern connected to services provided to Translate UK.
- Suppliers must cooperate with reasonable due diligence, audit, investigation and corrective action requests.
- Translate UK may suspend or terminate supplier relationships where modern slavery risks are not adequately addressed.

Recruitment Controls

- Direct engagement with language professionals wherever possible.
- Monitoring for indicators of coercion, exploitation or unusual third-party control.
- Review of payment arrangements to identify potential warning signs.

8. Training and Awareness

Translate UK Ltd will provide proportionate training and awareness activity to relevant employees and managers to help them understand modern slavery indicators, safeguarding considerations, recruitment risks, supplier risks and internal reporting routes. Training requirements will be reviewed periodically and targeted according to role and risk exposure.

9. Reporting Concerns

Translate UK encourages all employees, freelancers, contractors and suppliers to raise concerns regarding suspected modern slavery, human trafficking, forced labour or exploitation as soon as possible.

Reports may be made through:

- Line managers.



- The Compliance Team.
- Designated safeguarding personnel.
- Whistleblowing arrangements.

Concerns will be taken seriously and handled sensitively. Individuals raising concerns in good faith will not be subjected to detrimental treatment for doing so.

Where there is an immediate risk of harm or a safeguarding concern, the matter must be escalated urgently in accordance with Translate UK's safeguarding and incident reporting procedures.

Incident Response Process

1. The concern is received and recorded by the appropriate manager, Compliance Team member or safeguarding contact.
2. An initial review is completed to assess urgency, safeguarding risk and whether immediate protective action is required.
3. Where there is an immediate risk of harm, the concern is escalated in line with safeguarding and incident reporting procedures.
4. The matter is investigated proportionately, with confidentiality maintained as far as possible.
5. Corrective action is agreed and implemented where required, including supplier action plans, suspension of activity or referral to external authorities where appropriate.
6. Records of the concern, investigation, decisions and actions taken are retained securely.

10. Record Keeping

Translate UK Ltd will retain appropriate records to demonstrate the operation and effectiveness of this Policy, including:

- Recruitment, identity and Right to Work checks where applicable.
- Supplier due diligence checks and approval records.
- Modern slavery risk assessments and review outcomes.
- Training and awareness records.
- Reported concerns, investigations and corrective actions.
- Policy review and approval records.

11. Consequences of Non-Compliance

Failure to comply with this Policy may result in appropriate action, depending on the circumstances. This may include disciplinary action, termination of supplier or contractor arrangements, removal from approved supplier or interpreter lists, suspension of activity, corrective action plans, or referral to relevant authorities where required.

12. Monitoring and Review

Translate UK monitors the effectiveness of its modern slavery controls through:



- Internal audits.
- Compliance reviews.
- Supplier monitoring.
- Recruitment checks.
- Incident reporting analysis.
- Policy reviews.

Key performance indicators monitored include:

- Percentage of workforce subject to identity verification.
- Percentage of workforce subject to Right to Work checks where required.
- Number of modern slavery concerns reported.
- Number of safeguarding referrals involving exploitation concerns.
- Number of staff receiving training.

This Policy is owned by the Compliance Team and will be reviewed at least annually, with approval by the Directors. It may also be reviewed sooner where there are significant legal, contractual, operational or risk-based changes.

This Policy supports and informs any annual Modern Slavery Statement or Report prepared by Translate UK Ltd, including information on governance, due diligence, risk assessment, training, monitoring and continuous improvement activity.

13. Continuous Improvement

Translate UK Ltd will continue to strengthen its approach to preventing modern slavery by:

1. Continuing annual review of modern slavery policies and procedures.
2. Expand supplier due diligence processes.
3. Enhance workforce awareness training.
4. Integrate modern slavery considerations into wider safeguarding processes.
5. Monitor emerging risks associated with subcontracted service provision.
6. Continue to promote ethical recruitment practices throughout the organisation.

14. Approval and Ownership

This Policy has been reviewed and approved by the Directors of Translate UK Ltd. The Directors retain overall responsibility for ensuring that appropriate systems and controls are in place to prevent modern slavery and human trafficking within the organisation and its supply chain.



