ColX Group

Modern Slavery & Human Trafficking Environment Policy

12/01/2026

Classification:
PUBLIC

Equita JACOBS Ross&Roberts Stirling Park

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Introduction

ColX Group is a modern organisation with staff located in two offices, our Headquarters based in Birkenhead with Enforcement Agents located in communities throughout England & Wales and our Scottish office in Kilmarnock with Sheriff Officers located throughout the Sheriffdoms in Scotland.

We demonstrate real understanding of key policies required as a responsible organisation, employer and local government service provider, Approved Enforcement Agency (AEA) to HMCTS and Sheriff Officer & Messengers-at-Arms services. ColX Group have extensive experience of delivering seamless services with corporate social responsibility and understand the impact our organisation has on both social and economic environments in which we operate.

Slavery is illegal everywhere in the world, but despite that, there are currently an estimated 49.6 million people in modern slavery or victims of human trafficking across the globe. Out of the millions of people trapped in modern slavery, around 27.6 million people are believed to be trapped in forced labour worldwide in various forms which includes 17.3 million people who are exploited in forced labour exploitation in the private economy and 3.9 million who are subjected to state-imposed forced labour, so it is paramount that businesses take action to end these abhorrent practices.

Purpose

We are committed to playing our role by ensuring that through our management and operations we have the systems, policies, and processes in place to identify any potential instances of exploitation and, if found, eradicate modern slavery in all its forms from our business and supply chain. We are taking the appropriate steps to ensure that everyone who works for us benefits from a working environment in which their fundamental human rights are respected and anyone that we do business with also upholds these principles.

The information in this policy sets out the measures we have in place to ensure effective elimination of modern slavery and human trafficking through our operations and supply chain we partner. It covers the activities and is our Modern Slavery Statement required under the provisions of the Modern Slavery Act 2015 (the Act).

Our Policy and procedures set out a zero-tolerance culture to all forms of modern slavery, servitude and forced or compulsory labour and human trafficking in our organisation, our supply chain and our customers in the communities we operate.

Scope

This policy is applied across the ColX Group which includes the following businesses:

- ColX Ltd
- Equita Ltd
- Jacobs Enforcement Ltd
- Ross & Roberts Ltd
- Stirling Park LLP

The terms ‘Group/we/us/ours’ will be used for the duration of this document.

Intended Audience

All policies require participation, this policy applies to all permanent, voluntary and contracted staff working directly or indirectly for ColX Group and associated businesses.

Compliance

All Policies form part of our UKAS accreditations independently audited annually.

Compliance to this policy will be audited by our Governance, Risk & Compliance Manager which may include random and scheduled inspections.

Non-Compliance

Non-compliance with this policy may lead to disciplinary action and / or criminal proceedings being taken.

Contacts

For further information or should you have any questions, please contact the Governance, Risk & Compliance Manager.

Review

This policy will be reviewed annually, or if significant changes occur to ensure its continuing suitability, adequacy and effectiveness by all relevant stakeholders and approved by top management.

Sharing

This policy is marked ‘Public' ‘and may be shared without permission.

Our Policies in relation to Modern Slavery

Our commitment to human rights and the eradication of modern slavery is overseen by our Senior Leadership Team. The following company policies support us in mitigating the risks of modern slavery in our business and supply chain. They apply to all and are available to all colleagues via our SharePoint. Policies are managed by relevant functional heads and are imbedded in our company-wide risk management framework.

Code of Conduct:

The Code of Conduct describes what we must do and how we must behave to ensure we have the trust of all our stakeholders. It details how we will create better outcomes in the right way, not at any cost, in line with our purpose and values. The Code builds on these foundations and applies to everyone who works at, or with, us, it summarises in one place elements of our key policies, and the standards and procedures which support them.

Speak Up Policy:

Sets out our commitments to speaking up about serious concerns, detailing how any person working at or with us , including those employed in our supply chain, can raise concerns or “whistle blow” and the channels available to do so confidentially, responsibly, and effectively and without fear of repercussions.

Supply Chain - Charter:

Sets out the principles of how we will conduct business in an open, honest, and transparent manner, and the behaviours and practices we expect of our suppliers and partners. This includes specific reference to our expectations for our suppliers to never use or support practices that inhibit the development of children, not hold an individual or group in slavery or servitude, not use any form of involuntary labour, nor traffic individuals or groups for the purpose of labour exploitation in line with the Modern Slavery Act. We expect all our supply chain to report any issues of compliance with our charter to us within five working days, or any shorter period required by regulation. We expect all our supply chains’ colleagues or contractors to report any breaches through their own grievance mechanism, or directly to us.

Supply Chain - Procurement Policy:

Sets out what our supply chain should expect from us when we buy goods and services and the requirements that must be met when doing so. This includes operating responsible business procurement practices with clear and fair procurement processes and paying promptly in accordance with payment terms.

Equality, Diversity and Inclusion Policy:

Ensures that we foster a fair and inclusive workplace, where our people are valued, their differences are respected, and discrimination is eliminated. Our policy is supported by a mandatory Diversity and Inclusion training module for all colleagues that needs to be taken annually.

Human Rights Policy:

Ensures appropriate procedures are in place to mitigate the risk of potential breaches of international human rights standards, including the United Nations Universal Declaration of Human Rights (UDHR), the International Labour Organisation (ILO) core conventions on Labour Rights, and the Modern Slavery Act.

Wellbeing Policy:

Sets out our commitment to prioritise and create working environments that protect, support, and promote the wellbeing of all our colleagues, managing any factors that may cause negative emotional, psychological, physical, or social impacts. We expect everyone to have the necessary training and awareness to protect the wellbeing of all our colleagues with working conditions that make our people feel happy and healthy.

Safeguarding Policy:

Sets out our commitment to safeguarding our colleagues, and any other adults at risk or children who encounter us during work related activities. Safeguarding relates to promoting the welfare of adults or children at risk and protecting them from harm. We are committed to providing the necessary training to our colleagues to do this, fulfilling our legal and regulatory safeguarding requirements, and providing a safe, efficient, confidential, and supportive process for reporting and managing any safeguarding concerns or issues.

Tackling Modern Slavery – Our People

We continue to develop our culture, so wellbeing becomes an intrinsic part of everything all colleagues do, encouraging managers to have wellbeing conversations with their people as part of their regular check-ins. We focus on helping to ensure the right home, office or hybrid working environments to support the safety and mental health of our people, which includes processes for colleagues to raise reasonable adjustment requests. Our Safeguarding Policy sets out our approach to protecting our teams, service users and any member of the public who we have contact with. By embedding this policy, we promote a culture where safeguarding is everybody's business and ensure a clear and structured approach to safeguarding in all areas of our business.

Safeguarding Communities

We have responsibility for eradicating modern slavery in our own organisation, our supply chain and just as important within the communities we work collecting multiple debt types from both residential and commercial premises, executing warrants of arrests, and providing social inclusion initiatives. We have procedures in place underlined by specialist staff training to ensure we safeguard customers, reporting concerns to our clients and appropriate multiple agencies.

Being a Responsible Employer

To ensure that we recruit and treat employees fairly, mitigating the risks of modern slavery, our human resources (HR) policies set out our procedures on how we:

- Recruit and select employees in a fair, lawful, and professional manner, both for internal and external candidates
- Treat all employees fairly during their employment and, if there is an occasion when an employee does not feel that they have been treated fairly, there are procedures in place to raise a grievance
- Manage the exit of an employee from the business in a fair and consistent manner

We have a robust recruitment and selection policy that must be followed process before a staff member is appointed. A critical part of this process is mandatory screening of all staff, compliant with HMG Baseline Personnel Security Standards, and link to modern slavery policies including the right to work in UK; Evidence of 6 years' residency; Criminality check, Financial Probity check; Evidence of Qualifications; DVLA licence endorsements check; Social Media Check; Debt Free (no CCJs); Verified references from past and current employer; and Certificates of Qualifications & Professional Memberships held. These

checks ensure we have appropriate screening with authentication / verification and staff due diligence checks.

Our Human Rights Policy details our commitments to labour and workplace rights. We provide fair working conditions for all our employees including terms and conditions of employment, remuneration, working hours, health and safety, resting time, holiday entitlements and benefits. These are applied according to territory-specific statutory requirements.

Our employees pay will not be lower than that required by local law, or, in the absence of a law, the level paid generally within our industry. Hours of work will be in line with local law or, in the absence of law, the norm within our industry, and shall not be excessive. Employees shall not be contractually required to work more than 48 hours per week and overtime will only be worked on an optional basis. Forced or compulsory labour is prohibited. Employees will not be forced into involuntary labour and coercion at work is not acceptable. Financial penalty as a disciplinary sanction is prohibited.

Tackling Modern Slavery – Our Supply Chain

We understand our responsibility to procure goods and services from ethical and socially responsible suppliers providing they can demonstrate strict adherence to our policies.

We promote safe and fair working conditions and the responsible management of all environmental and social issues in every part of our supply chain.

Jacobs operate a Preferred Approved Suppliers List for the procurement of all goods and services both to our offices and to support Agents / Officers out in the field such as vehicle removals, storage and auctioneers.

In order to be accepted on our supplier select list all suppliers must meet our essential criteria which includes:

- Modern Slavery compliant policies
- Robust recruitment & selection policies and vetting procedures
- A management system that addresses Corporate Social Responsibility including supplier conduct
- Compliance with all appropriate legislation including Modern Slavery Act 2015
- Robust training and development of staff and monitoring systems
- Modern Slavery referral systems in place, plus evidence of due diligence checks through their supply chain

We require our suppliers to be Living Wage employers and have no zero-hour contracts. Suppliers confirm they remain compliant annually.

Records are held of all suppliers and goods supplied on a central purchasing database. Any suspicion of modern slavery and / or human trafficking in our supply chain will be immediately reported and the organisation will be removed from our approved supplier list.

Working in Partnership with Recruitment Agencies

We work with agencies who must comply with our Supply Chain Charter and undergo our rigorous due diligence assessment to ensure that they are recruiting in line with our policies and values, and that they apply inclusive and value-based recruitment practices.

Mapping our Supply Chain Risk

We have a Supplier Risk Framework for assessing and managing our supply chain risk and introduce controls to ensure compliance to our Policies and Supply Chain Charter. The Risk Framework covers the full supplier lifecycle and defines the organisational responsibilities for supplier management.

We consider the labour and human rights theme as a priority risk area in relation to modern slavery and as such, suppliers are assessed against all aspects of their treatment of their people, including a requirement to provide evidence of how they guard against modern slavery.

Due Diligence

As a minimum, we expect both ourselves and our suppliers to comply with all applicable local laws and regulations providing safe working conditions, treating workers with dignity and respect, acting fairly and ethically, and using environmentally responsible practices where practicable.

Suppliers' compliance to the Supply Chain Charter is managed through our rigorous supply chain onboarding due diligence process for all new suppliers and is monitored via our Supply Chain Relationship Management & Review process which will assess our supply chains' exposure to all risks including modern slavery.

We prioritise suppliers that can demonstrate commitment to upholding responsible business practices. Our standard terms and conditions include a clause that all suppliers are required to comply with our Supply Chain Charter and uphold the highest standards of human and labour rights.

We have a zero tolerance for modern slavery and reserve the right to terminate a relationship with a supplier or third party that cannot demonstrate compliance with our Human Rights and Modern Slavery Policies.

Training and Communication

To make colleagues aware of the Act, we share this statement with all colleagues through our internal communication channels. We continue to provide awareness training to all colleagues of our commitments to identify the risks of, and remove all instances of, modern slavery, human trafficking, and exploitation through our mandatory training.

Our mandatory training for all staff covering all aspects of the Modern Slavery Act 2015 which forms part of our induction training and is required competency testing to sign off. In addition, we have regular quality testing of all tasks for all staff with regular refresher and awareness training to all colleagues of our commitments to identify the risks of, and remove all instances of, modern slavery, human trafficking, and exploitation through our mandatory training.

All policies and procedures are available via SharePoint and accessible in the both the offices and in the field. The Procurement and Finance teams have specialist training in due diligence and auditing the supply chain, ensuring their policies and procedures are compliant with modern slavery act.

All staff have access to the Modern Slavery Helpline: 0800 012 1700, and the Salvation Army helpline 0800 808 3733, both providing information and advice about modern slavery, with 24-hour reporting channels plus access to online training resources.

Reporting and Referral

We will report all concerns and identified suspicions of modern slavery and human trafficking either in our supply chain or in the public environment we operate, to the Authority / Home Office and first responder multi-agencies including Police, Child Protection Services utilising the National Referral Mechanism with consent from the adult (s) concerned and utilising the Duty to Notify scheme for non-consent referrals.

For Child referrals we will utilise the referral process and report to the Police & Children's Services simultaneously.

Appropriate forms are completed and registered on our referral records by our Governance, Risk & Compliance Manager in compliance to legislation and policy requirements.

Senior Leadership Approvals

This statement is made pursuant to Section 54(1) of the Act, which has been approved by the Senior Leadership Team and will be updated in line with the Modern Slavery Act's reporting requirements.

Document Control

Distribution & Review

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All Employees	Policy Zone
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Reviewers

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