

Slavery and Human Trafficking Statement 2018

Published 24 June 2019

INTRODUCTION

At Edinburgh Airport (airport) we have a zero-tolerance policy towards modern slavery and human trafficking. We are committed to upholding and continuously improving our practices to combat slavery and human trafficking. We actively work together to prevent the airport being used by human traffickers and to avoid these activities in our direct operations, our indirect operations and our supply chain as a whole.

During 2018 we successfully organised inter-agency tactical operations, including with Edinburgh’s Home Office Immigration Enforcement Team, to combat potential occurrences of human trafficking or slavery. We have also ensured that we keep processes and procedures in place to mitigate the risks of human trafficking or slavery in our supply chains and business operations.

Edinburgh Airport’s 2016 and 2017 Modern Slavery Statements can be found on our website [here](#).

We have an appropriate and well-communicated policy; due diligence activities based on risk assessment and effective follow-up; good quality employee and business partner training; and a strong emphasis on collaborative partnerships.

OUR BUSINESS

Edinburgh Airport is a private limited company registered in Scotland. Edinburgh Airport is Scotland’s busiest airport and one of the fastest-growing airports in the UK. More than 37 airlines serve over 220 routes and over 14.3 million passengers travelled through the airport in 2018. Edinburgh Airport is one of the main routes in and out of Scotland and as such we can help combat slavery and human trafficking activity.

There has been no material change to the structure of our business as shown in our 2017 Statement:



2018 ACTIVITY

During 2018 the Airport successfully carried out the planned activities detailed in its 2017 Modern Slavery Statement.

Our 2018 activity included:

- Continuing to raise slavery and human trafficking awareness through online employee training. We made our training materials available to business partners and suppliers, and provided face-to-face training to around 45 of our Security Search Officers, who are in a unique position to identify and escalate potential human trafficking issues. New employees of the airport took the online training course as part of their induction;
- Organising specific operations including with Edinburgh's Immigration Enforcement Officers to identify potential victims of slavery or trafficking;
- Continuing to monitor for any potential risk areas in our supply chain and the wider business;
- Establishing a Joint Security Group consisting of the airport's Security Compliance team and security partners, the remit of which includes addressing any slavery or trafficking issues and mitigating the risks;
- Continuing to include legally binding requirements in business partner contracts to comply with modern slavery and human trafficking regulations.

More details of these activities are contained in the following sections.

Behavioural Detection Officer (BDO) Activity, External Security Agencies and our Security Officers

The airport's BDOs are specially trained officers whose role includes detecting any suspicious behaviour of visitors/passengers and taking appropriate action. The role includes assessing and disrupting potential occurrences of human trafficking.

During 2018 the BDOs worked collaboratively with Immigration Enforcement Officers to identify potential victims of modern slavery or human trafficking travelling through the airport. A special operation was organised where the BDOs and Immigration Enforcement Officers worked together, covering airport arrival areas, observing passengers, identifying people with suspicious behaviour and preventing potential occurrences of human trafficking. The operation was successful and further strengthened our links with partner agencies.

As a result of the face-to-face training given to our Security Search Officers, potential occurrences of modern slavery and human trafficking have been prevented by our Security Officers during 2018. By alerting the relevant authorities we were able to protect individuals from further victimisation.

The following case study illustrates this:

In January 2018, a 27-year-old Romanian woman arrived at the airport on a flight from Prague. She unsuccessfully tried to contact another Romanian woman she had been advised to call on her arrival, and then received a text message stating that her contact was within a Detention Centre.

The woman had no money in her possession and asked for help from several passengers. A security officer approached the woman who was evasive and reluctant to engage with the officer. The officer ascertained that the woman had travelled to Scotland having been promised employment, but that due to her state of distress, she wished to return to Romania. Police enquiries revealed that the

woman's contact had been detained by UK Border Force officers at Glasgow Airport earlier in the day due to previous involvement in prostitution.

The security officer then spoke to the woman about human trafficking, including into the sex trade and informed her that he believed that, under the circumstances, she may have been trafficked. Police contacted her mother in Romania and with assistance of handling agents at Edinburgh Airport, managed to book the woman a flight home. UK Border Force officers took her into their care and ensured she safely returned home the following day.

More operations are in the pipeline for 2019 where airport operational teams will monitor passengers and Immigration Enforcement Officers will question any passenger referred.

Risk Advisory Group (RAG)

The RAG at the airport comprises of senior leaders from across the business and from its partners including the Scottish Police and UK Border Force. This group reports to the airport's Chief Operating Officer. The members of this group seek to identify and mitigate risks regarding airport security and other threats. Identifying the risk of victims of modern slavery or human trafficking travelling through the airport was introduced as a standing item on this group's risk register in 2017 and it continues to be so. The airport's activity in this area has been and will continue to be periodically reviewed and assessed in this forum.

Joint Security Group (JSG)

The JSG, established in 2018, is chaired by the airport and comprises of multiple security and law enforcement partners. Any intelligence relating to slavery and trafficking is discussed in this forum and any significant concerns by the airport relating to slavery or trafficking issues are raised with the airport's Legal Director by the Security Compliance team.

Supply Chain

The airport's suppliers mainly consist of UK companies which have turnovers of a size requiring them to produce their own statements under the Modern Slavery Act 2015 (the Act).

Businesses tendering for airport contracts must respond to pre-qualification questions, including on Modern Slavery Act compliance, and must supply copies of their policies and procedures.

Suppliers that have not been active for over 12 months must re-submit a 'Supplier Onboard Pack' to the airport, including re-certifying their compliance with the airport's modern slavery and human trafficking policies and the law in this area. This reactivation requirement was implemented during 2018.

During 2018, and building on the position reached at the end of 2017 after its supplier risk assessment and questionnaire exercise, the airport's Procurement team strengthened its supplier on-board pack modern slavery and human trafficking compliance wording. All entities that seek to become an airport supplier must satisfy the onboard pack requirements.

During 2018 our Procurement department evaluated or checked the existence of each new supplier's policy on Modern Slavery and Human Trafficking and where there was no such policy, the supplier had to agree to the airport's policy.

HR Practices and Training

The airport has measures in place to check references provided by new employees. The airport's operational procedures to carry out identification, background and right to work checks seek to ensure that it does not hire any victims of modern slavery or human trafficking.

The airport's online Modern Slavery and Human Trafficking training course is made available to its employees, new joiners, business partners and suppliers, therefore spreading awareness amongst employees, business associates and suppliers about the importance of tackling slavery and human trafficking.

During 2019 training will be provided to staff from airport retail outlets on slavery and human trafficking, and we are planning to distribute cards with helpline numbers to staff for the purpose of reporting any potential incidents or occurrences of slavery or human trafficking.

Policies and Supplier Contracts

The airport issued its Anti-Slavery and Human Trafficking Policy in June 2017. The airport's standard supply contract wording includes a condition that suppliers comply with modern slavery and human trafficking regulations and report any instances of modern slavery or human trafficking identified. Suppliers in breach of these conditions may face termination of their contract.

2019 Plan of Action

The airport's plan of action for modern slavery and human trafficking issues in 2019 is outlined below:

- Organise more operations involving our operational teams and Immigration Enforcement Officers to identify potential victims of slavery and human trafficking at the airport;
- Include modern slavery and human trafficking training as part of an airport-wide crime prevention programme designed to deter, detect and disrupt criminal activity at the airport;
- Provide training to the airport's retailers, distributing cards with helpline numbers for reporting, thereby raising more awareness and mitigating risks;
- Continue to introduce slavery and human trafficking obligations into new contracts;
- Organise a 'Supplier Open Day' inviting potential new suppliers to the airport to explain the various elements of doing business with the airport and our important compliance requirements, including Modern Slavery and Human Trafficking;
- Carry out a focussed verification of compliance exercise with our suppliers of third-party resource (e.g. cleaning services, special assistance services and car park management) to ensure modern slavery and human trafficking risks have been mitigated within their workforce.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2018. It was approved by Edinburgh Airport Limited's Board of Directors on 12 June 2019.



Gordon Dewar, Chief Executive
For and on behalf of Edinburgh Airport Limited