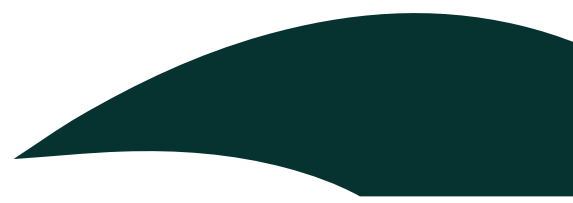


Abbey Group Policy Against Child Sex Tourism and Trafficking



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Purpose

At Abbey Group we are committed to ethical tourism and the protection of children from exploitation. Child sex tourism and human trafficking are severe violations of human rights, national laws, and international agreements. This policy outlines our zero-tolerance approach and the measures we take to prevent, identify, and report child sexual exploitation and trafficking in the tourism industry.

Scope

This policy applies to all employees, contractors, suppliers, business partners, and collaborators of Abbey Group in Ireland, UK and internationally. The policy covers all aspects of our operations, including transportation, accommodations, tours, and client interactions.

Definitions

Child Sex Trafficking: The recruitment, transportation, transfer, harbouring, or receipt of children for the purpose of sexual exploitation.

Human Trafficking: The trafficking of individuals, including children, for the purpose of exploitation, such as forced labour, sexual exploitation, or other forms of abuse.

Child: For the purposes of this policy, a child is any individual under the age of 18.

Legal Framework

Ireland

The Criminal Law (Sexual Offences) Act 2017: reinforces protections for children and vulnerable persons, introduces clearer definitions of consent, and modernizes sexual offence laws. It criminalizes grooming, child pornography, and the purchase of sexual services to combat exploitation and human trafficking. The Act also updates offences related to rape, incest, exposure, and voyeurism, while enhancing victim protection measures, such as anonymity and support services during legal proceedings.



The Children First Act 2015: establishes a legal framework for child protection, making it mandatory for certain professionals and organizations working with children to report suspicions of abuse and neglect to Tusla (the Child and Family Agency). It also requires these organizations to prepare child safeguarding statements and promotes a shared responsibility for child welfare, ensuring that children's safety and protection are prioritized in all services.

UK

The Modern Slavery Act 2015 (UK): consolidates and strengthens measures against modern slavery, including human trafficking. Specifically, sections 1-2 criminalize the trafficking of persons for the purposes of sexual exploitation, labour exploitation, and domestic servitude.

- **Section 1 (Offence of Slavery, Servitude, and Forced or Compulsory Labor):** The act criminalizes forced labour and trafficking, including trafficking of children for sexual exploitation.
- **Section 2 (Offence of Trafficking People for Exploitation):** This section criminalizes the trafficking of people into the UK or within the UK for exploitation, which includes sexual exploitation of children.

The National Referral Mechanism (NRM, England & Wales):

This framework, which was introduced under the Modern Slavery Act 2015, is used to identify victims of modern slavery, including child trafficking. It ensures that victims of trafficking are provided with appropriate care and support.

The Children Act 1989 (England & Wales): This Act provides a framework for the protection and welfare of children in England and Wales. It ensures that local authorities and relevant agencies take steps to safeguard children from abuse, including sexual exploitation and trafficking.

- **Section 47 (Children in Need of Protection):** This provision mandates local authorities to investigate cases where a child is at risk of significant harm, including trafficking.

The Children (Scotland) Act 1995 is a key piece of legislation that outlines the rights and responsibilities of parents and local authorities regarding children in Scotland. It focuses on the welfare of children and ensures their best interests are prioritized.

- The child's welfare is the paramount consideration in any decision made under the Act.



- Children capable of forming views must have their opinions considered, with more weight given as they grow older.

The Protection of Children Act 1999 (UK): This Act sets out the obligations of agencies to prevent and respond to cases of child abuse and exploitation. It includes measures for criminalizing the abuse of children, including sexual exploitation.

The Human Trafficking and Exploitation (Scotland) Act 2015:

This legislation criminalizes trafficking for the purpose of exploitation, including sexual exploitation, and provides for assistance to victims.

- **Section 1 (Human Trafficking Offence):** This section creates an offence for trafficking people into, out of, or within Scotland for the purpose of exploitation, including sexual exploitation.

The Sexual Offences Act 2003(England and Wales, with some provisions applying to Northern Ireland and Scotland):

The Act provides key legislation for sexual offenses, including those involving the trafficking of children for sexual purposes.

- **Section 9 (Sexual Exploitation of Children):** This section criminalizes the sexual exploitation of children under the age of 18.

International

The UN Convention on the Rights of the Child (CRC), Treaty 1989: outlines the civil, political, economic, social, and cultural rights of all children. It emphasizes key principles such as the right to life, survival, and development; protection from abuse and exploitation; the right to education, health care, and an adequate standard of living; and the right to be heard. Adopted in, it obligates governments to act in the best interests of children, ensuring their well-being and full participation in society.

The UN Convention on The Optional Protocol on the Sale of Children, Child Prostitution, and Child Pornography (2000): enhances the protection of children from sexual exploitation by requiring countries to criminalize and prosecute these offences. It focuses on preventing the sale of children for sexual exploitation, child prostitution, and the production or distribution of child pornography. The protocol promotes international cooperation to combat these crimes and ensures that child victims receive support, protection, and assistance for their recovery and reintegration.



The Council of Europe Convention on Action against Trafficking in Human Beings, Treaty 2005: prevents human trafficking, protecting victims, and prosecuting traffickers. It emphasizes a victim-centred approach, ensuring access to support services, legal assistance, and protection for victims, regardless of their immigration status. The Convention also promotes international cooperation, monitoring, and coordination among member states to combat human trafficking effectively while focusing on safeguarding human rights and preventing re-victimization.

Statement of Commitment

The Abbey Group is committed to adhering to all relevant Ireland and UK laws and international conventions regarding child trafficking. Our company will work to prevent trafficking, detect suspicious activities, and cooperate with law enforcement agencies to combat this crime.

Prevention Measures

We will take the following steps to prevent child sex trafficking:

Employee Education: All employees will be aware of this policy which will be published to our internal intranet and our company website. They understand the company's zero tolerance approach to slavery and human trafficking and understand how to report signs of child sex trafficking in line with Ireland and UK laws.

Stakeholder Collaboration:

We focus on transparency within our operations and work closely with our employees, clients, and suppliers to monitor supply chains as we are committed to ensuring that there is no slavery or human trafficking connected to any part of our business.

Creating Awareness: As part of our prevention efforts, we will engage in awareness campaigns, providing information on child trafficking to our suppliers and clients and encouraging everyone to report suspicious behaviour.



Response Protocol

In the event of a suspected child trafficking case, Abbey Group employees will follow these steps:

Immediate Action: If a child is at risk, employees must prioritize the child's safety by contacting law enforcement immediately. Employees will follow the procedures set out in the Modern Slavery Act 2015, The Children Act 1989, The Criminal Law (Sexual Offences) Act 2017 and The Children First Act 2015, to protect the child and report the incident.

Report to Authorities - in Ireland: Employees will notify An Garda Síochána (Irish police) via the Child Protection Unit or the Tusla Child and Family Agency; - in UK: the National Crime Agency (NCA), Modern Slavery Helpline, or local police.

Cooperation with Agencies: Abbey Group will fully cooperate with law enforcement, social services, and NGOs to ensure that the child receives appropriate care, shelter, and legal support.

Support for Survivors

Referral to Support Services: We will ensure that victims of trafficking are referred to appropriate support services, including shelter, counselling, and legal services, as required under Ireland and UK law.

Post-Incident Review: We will conduct an internal review after an incident to ensure compliance with Ireland and UK laws and assess areas for improvement.

Monitoring and Accountability

Abbey Group will ensure compliance with Ireland and UK laws through regular audits and reviews of anti-trafficking practices.

Zero-Tolerance: Any employee or partner found to be complicit in child trafficking, directly or indirectly, will face immediate termination or contract termination.



Partnerships and Advocacy

Collaboration with Law Enforcement: We will work closely with the National Crime Agency (NCA), local police forces, and NGOs such as Stop the Traffik and The Salvation Army, who provide support and advocacy for trafficking victims.

Public Awareness: Abbey Group will continue to advocate for stronger anti-trafficking laws and collaborate with public and private sector partners to combat trafficking at national and international levels.

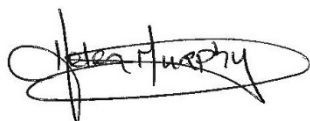
Review and Update of Policy

This policy will be reviewed annually and updated as necessary to ensure it aligns with current legislation, international best practices, and company needs.

This policy has been reviewed and approved by:



Darren Byrne, CEO, 11.02.25



Helen Murphy, HR Director, 11.02.25

