

## **Human Resources Policy Document: HRPOL15**

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### **Modern Slavery Policy.**

We conduct our business fairly, ethically and with respect to fundamental human rights. This policy supports our commitment to the prevention of all forms of modern slavery occurring within our own organisation or infiltrating our supply chains or any other business relationship.

Modern slavery can take many forms. Criminal activities include:

- Slavery: where ownership is exercised over an individual
- Servitude: involves the obligation to provide service imposed by coercion
- Forced and compulsory labour: all work or service, not voluntarily performed, which is obtained from an individual under the threat of force or penalty.
- Human trafficking: involves arranging or facilitating the travel of another with a view to exploiting them
- Child labour: whilst not always illegal in the jurisdiction in which it takes places, child labour involves the employment of children that is exploitative, or is likely to be hazardous to, or interfere with, a child's education, health (including mental health), physical wellbeing or social development.

These all describe criminal activities that deprives victims of their liberty and usually involves financial and other exploitation.

The policy applies to all persons working for or on our behalf in any capacity, including all colleagues, agency workers, contractors, consultants, and any other third-party representative. We expect all who have or seek to have a business relationship with the organisation to familiarise themselves with this policy and to always act in a way that is consistent with its values.

Our Anti – Slavery Officer ('ASO') is Zach Towers – People and Service Director. The ASO has overall responsibility for this policy and in ensuring that the organisation complies with all its legal obligations. It is the responsibility of all colleagues to ensure that they understand the contents of this policy as it applies to them. This policy does not form part of your employment contract, and we may update it at any time.

Additional policies that relate to this are the Disciplinary procedure, Grievance Procedure, and Whistleblowing procedure.

### **1. Prevention**

We carry out appropriate checks on all colleagues, recruitment agencies and suppliers, so that we know who is working for us on our behalf.

We give every colleague a written employment contract, and they are paid in accordance with the law. We comply with our legal obligations to ensure health and safety of all our colleagues and workers, including in relation to working hours, rest breaks and holidays.



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## For our significant suppliers

If you supply us with goods or services, you must assess your business and supply chains and confirm to our ASO that you:

- Comply with your legal obligations, in relation to Modern Slavery; and
- Are committed to ensuring there is no Modern Slavery taking place in your business, or in any of your supply chains.
- You must also provide us with a copy of your anti-slavery policy

If you breach this policy or are found to have Modern Slavery in your business, or knowingly in your supply chain, we may terminate our contract with you and pursue legal remedies against you.

## For colleagues or Workers providing services for us

You must immediately report any suspicions of Modern Slavery in our business or supply chains to our ASO on 0330 2021950. Our ASO will investigate and report to our Board of Directors within a reasonable time, on what actions may be required to be taken.

You will not suffer any detrimental treatment as a result of reporting any genuine concerns, raised in good faith, under this policy. This applies, even if after investigation, they are found to be mistaken. If you believe that you have suffered any such treatment, you should immediately tell our ASO and, if you are an employee, refer to our Grievance and Whistleblowing Policies

The organisation does not enter business with any other organisation, in the UK or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

If suppliers breach this policy, or are found to have Modern Slavery the business, or knowingly in their supply chain, we may terminate our contract with them and pursue legal remedies against them.

For a colleague or worker providing a service for us, any suspicions of modern slavery in our business or supply chain must be reported immediately to our ASO on 0330 2021950.

Reports will then be investigated and reported to our Board of Directors within a reasonable time, on what actions may be required.

Colleagues will not suffer any detrimental treatments because of reporting any genuine concerns, raised in food faith, under this policy. If the colleague believes that they have suffered such treatment, they must inform the ASO and refer to the company grievance policy.

## 2. Awareness and training

The organisation will ensure that all relevant staff receive adequate training on this policy. Colleagues will receive training on the broader issues of modern slavery to assist them in appreciating the extent of the problem of modern slavery and the identify individuals/areas of the business that may be at risk from practices of modern slavery.

## 3. Breaches

Any breaches of this policy will be taken seriously and dealt with on a case-by-case basis.

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The breach of this policy by a colleague may lead to disciplinary action being taken in accordance with our disciplinary procedure. Serious breaches may be regarded as gross misconduct and may lead to immediate dismissal further to our disciplinary procedure. It could also involve other legal steps being taken against you.

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