

## Anti-Slavery and Human Trafficking Policy

• Responsibility for Policy	Managing Director: Sonia Rawlings
• Relevant to:	All S R Partnership Ltd Staff as detailed in policy.
• Approved by:	Managing Director: Sonia Rawlings
• Responsibility for Document Review:	Safeguarding Officer: Karen Ford
• Date introduced:	May 2022
• Date(s) reviewed:	May 2023
• Next Review Date:	May 2024

### RELEVANT DOCUMENTS

- Modern Slavery Act 2015

### RELATED POLICIES

- Staff Handbook
- Disciplinary Policy
- Whistleblowing Policy
- Equality and Diversity Policy
- HR Policy

## **1. Statement**

- 1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.
- 1.2 S R Partnership Ltd has a zero-tolerance approach to modern slavery and human trafficking, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- 1.3 S R Partnership Ltd are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.
- 1.4 S R Partnership Ltd expect the same high standards from all our contractors, suppliers, and other business partners, and as part of our contracting processes, in the coming year we will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.
- 1.5 This policy applies to all persons working for S R Partnership Ltd or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives.

## **2. Responsibility for the policy**

- 2.1 S R Partnership Ltd has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 2.2 S R Partnership Ltd has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

- 2.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.
- 2.4 Everyone reading this policy is invited to comment and suggest ways in which it might be improved. Comments, suggestions, and queries are encouraged and should be addressed to the Managing Director.

### **3 Compliance with the policy**

- 3.1 All those working for S R Partnership Ltd or under its control must ensure that they read, understand, and comply with this policy. This policy is sent to anyone working for or representing S R Partnership Ltd as detailed in paragraph 1.5. Proof of receipt and the policy being read is required and the staff member will have to sign as proof.
- 3.2 The prevention, detection, and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for S R Partnership Ltd or under S R Partnership Ltd.'s control. All those mentioned in this policy are required to avoid any activity that might lead to, or suggest, a breach of this policy. All persons working on behalf of or for S R Partnership Ltd as mentioned above must notify their line manager or a company Director as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future. Or report it in accordance with S R Partnership Ltd.'s Whistleblowing Policy, without delay.
- 3.3 Where appropriate, and with the welfare and safety of local workers as a priority, S R Partnership Ltd. will give support and guidance to our suppliers to help them address coercive, abusive, and exploitative work practices in their own business and supply chains.
- 3.4 S R Partnership Ltd encourages raising concerns about any issue or suspicion of modern slavery in any parts of S R Partnership Ltd.'s business or supply chains of any supplier tier at the earliest possible stage. If any person believes or suspects a breach of this policy has occurred or that it may occur, they must notify their line manager or company Director or report it in accordance with our Whistleblowing Policy as soon as possible.
- 3.5 If anyone is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, it must be raised with their line manager or company Director.
- 3.6 S R Partnership Ltd aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. S R Partnership Ltd are committed to ensuring no one suffers any detrimental treatment as a result of reporting in

good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of S R Partnership Ltd.'s business or in any of our supply chains. (*Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern.*)

3.7 If anyone believes that they have suffered any such treatment, they should inform their line manager immediately. If the matter is not remedied, and they are an employee, they should raise it formally using S R Partnership Ltd.'s Grievance Procedure, which can be found in the current employee handbook.

## **4. Communication and awareness of this policy**

4.1 Training on this policy, and on the risk S R Partnership Ltd.'s business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and updates will be provided using established methods of communication between the business and its Employees and any person acting on behalf of S R Partnership Ltd.

4.2 S R Partnership Ltd has published our modern slavery and Human trafficking policy on our website on the home page in a prominent place with a visible link and on our noticeboard at the offices of S R Partnership Ltd. where it can be seen by all staff, visitors, and candidates.

4.3 S R Partnership Ltd.'s zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter. This is also communicated to persons or company's receiving emails from S R Partnership Ltd. In the form of a statement at the bottom of every email sent by all S R Partnership Ltd.'s staff. "S R Partnership Ltd is committed to combatting slavery and human trafficking and to acting with integrity in all its dealings, relationships, and supply chains."

4.4 Candidates using S R Partnership Ltd.'s services are provided an awareness at induction on modern slavery and human trafficking.

## **5. Breaches of this policy**

5.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

5.2 S R Partnership Ltd may terminate its relationship with other individuals and organisations working on our behalf if they breach this policy.

## **6. Monitoring and review**

6.1 The Policy Lead will action a review of this policy statement and related policies on an annual basis. Any changes needed to ensure effectiveness will be drawn to the attention of the Managing Director. The revised document will be sent to all staff.

Sonia Rawlings  
Managing Director  
S R Partnership Ltd.