

Ref: PO - A – 027 – PP

Modern Slavery Policy

PART ONE

About this Policy

Directorate	People and performance
Range	Groupwide
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Policy Owner:	Rachel Challinor
Policy Author	Vicky Askey
Key target Audiences	All Staff
Related Policies	Whistleblowing Policy and Procedure Grievance Policy and Procedure Disciplinary Policy and Procedure Performance Improvement Policy and Procedure Recruitment Policy Procurement Policy Safeguarding Policy
Legal & Regulatory compliance	Modern Slavery Act 2015 European Convention on Human Rights - Article 4
Related processes:	Procurement Safeguarding Recruitment
Related protocols and documentation:	Whistleblowing Declaration Form
Approved by:	Group Board
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Summary

This Policy sets out Longhurst Group’s intent to understand all potential risks of modern slavery to our business and to put in place steps to ensure that there is no slavery or human trafficking in our business and our supply chains.

The Policy identifies where risks may arise and sets out how we will manage them.

Introduction

Modern slavery is a crime and a violation of human rights. It takes various forms, including slavery, servitude, compulsory labour and human trafficking for exploitation and can have a significant adverse impact on individuals, families and communities across the world.

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PART TWO

Policy

Intent

This Policy ensures compliance with the Modern Slavery Act 2015 and Article 4 of the European Convention on Human Rights. It meets our ethical obligations and best practice as an employer, service provider and business partner.

Principles

Longhurst Group will operate in an open and transparent way.

We recognise the expectation that we will maintain high ethical standards and best practice.

We recognise our responsibility to take a robust approach to slavery and human trafficking. We recognise our obligations to identify, target and prevent slavery and human trafficking and we understand that everyone has a role to play in this.

We have a zero tolerance approach to modern slavery across all areas of our organisation, as well as in our supply chains.

Scope

The terms “Longhurst Group” and “the Group” incorporate all member companies and subsidiaries.

This Policy applies to all employees, including fixed term and temporary employees, volunteers, apprentices, agency and reserve workers; contractors; external consultants; third party representatives; and business partners.

The Policy does not form part of any employee’s contract of employment and we may amend the Policy at any time.

Policy details

Supply chains and partnerships

As we operate solely with the UK we are at a low risk of exposure to slavery and human trafficking. However, our key area of risk lies in our relationships with supply chains - suppliers, contractors and business partners.

Our zero-tolerance approach to modern slavery will be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

We will undertake appropriate due diligence when considering taking on new suppliers, contractors and business partners, and regularly review our existing suppliers, contractors and business partners.

We will implement a Supplier Code of Conduct. This will require all suppliers, contractors and business partners to confirm in writing their compliance with the Modern Slavery Act 2015 and include relevant clauses in any contracts or agreements.

Serious breaches of our supplier code of conduct may result in the termination of the business relationship.

Staff

We will only use reputable employment agencies and we will always verify the practices of any new agency before engaging staff from it.

Employees are required to avoid any activity that might lead to, or suggest, a breach of this Policy. Employees will be encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our organisation or supply chains at the earliest possible stage.

If an employee believes or suspects a breach of this Policy has occurred or there is a risk of a breach occurring, they must notify their manager or report it in accordance with our Confidential Reporting (Whistleblowing) Policy as soon as possible.

We encourage openness and we will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

Any breaches of this policy by employees will be dealt with under our Disciplinary, Grievance and Performance Improvement Policy.

Risk management

We will establish and implement effective processes to:

- obtain proof of nationality/right to work from each employee and retain copies of these.

Training and awareness

We will provide training on this Policy; any associated processes; and the potential risks we face. This will be included in core induction for new staff and will also be available for existing staff at regular intervals.

We will communicate the Policy to all employees.

Roles and Responsibilities

The Group Board and Executive Leadership team have overall responsibility for ensuring this Policy complies with our legal and ethical obligations and that it is implemented effectively.

The Governance directorate has primary day to day responsibility for dealing with any queries, investigations and audits of internal control systems and Processes.

Managers at all levels are responsible for ensuring that their staff understand and comply with this Policy.

It is the responsibility of the procuring manager or lead officer to ensure that the Supplier Code of Conduct and contractual arrangements are agreed and implemented with our suppliers, contractors and business partners and that compliance statements are obtained and retained.

Monitoring, Evaluation and Review

This policy will be reviewed at least every three years. Human Resources will monitor compliance by staff. Contract managers/lead officers will monitor supply chain compliance.

We will publish annually on our website a Statement which confirms our compliance with this Policy and legislation. It will set out what action we have taken during the year and what steps we intend to take next.

PART FIVE

Appendices

1. Risk Analysis
2. Equality Analysis
3. Environmental impact assessment
4. Controls Assurance