1. **Application**

This policy applies to all of the S&G Response workforce, including employees, consultants and contractors.

1. **Purpose and objectives**

This Policy sets out the measures we take to understand all potential modern slavery and human trafficking risks related to our business. It also details subsequent protocols which ensure that modern slavery and human trafficking does not feature in any form across our business and supply chain.

We are committed to protecting and respecting human rights and have a zero-tolerance approach towards modern slavery. We do not enter business relations with any organisation, which knowingly supports, or is found to be involved in slavery, servitude or forced compulsory labour.

We fully support the UK government’s objectives to eradicate modern slavery and human trafficking via the Modern Slavery Act 2015 and we are committed to maintaining best practice and seek continuous improvement. We invite you to help, share best practice and to hold us to account and challenge where you think we can do better.

1. **Key legislation/regulation**

The Modern Slavery Act 2015 was introduced to combat modern slavery in the UK and consolidate previous offences relating to trafficking and slavery. It gives law enforcement the tools to fight modern slavery, ensure perpetrators can receive suitably severe punishments for these crimes enhance support and protection for victims.

The act is in place to:

* consolidate and simplify existing offences into a single act
* ensure that perpetrators receive suitably severe punishments for modern slavery crimes (including life sentences)
* enhance the court’s ability to put restrictions on individuals where it’s necessary to protect people from the harm caused by modern slavery offences
* create an independent anti-slavery commissioner to improve and better coordinate the response to modern slavery
* introduce a defence for victims of slavery and trafficking
* place a duty on the secretary of state to produce statutory guidance on victim identification and victim services
* enable the secretary of state to make regulations relating to the identification of and support for victims
* make provision for independent child trafficking advocates
* introduce a new reparation order to encourage the courts to compensate victims where assets are confiscated from perpetrators
* enable law enforcement to stop boats where slaves are suspected of being held or trafficked
* require businesses over a certain size to disclose each year what action they have taken to ensure there is no modern slavery in their business or supply chains

S&G Response does not currently fall under the criteria that requires preparation of an annual slavery and human trafficking statement. However, many of our business partners do and it is paramount that we comply with the act in full to fulfil our contractual obligations. It is also vital to us from a cultural and moral standpoint that we act with integrity and transparency at all times and this act is paramount to our corporate values.

1. **Policy and procedures**

S&G currently operates solely in the UK which is classed as a low-risk area by the Global Slavery index 2018, however, distribution channels into our suppliers may involve more high-risk areas. We are committed to applying the most robust controls to our business and suppliers to ensure that any potential areas of concern are highlighted and dealt with swiftly and comprehensively and with a zero-tolerance approach.

**Supplier Agreements**

Distribution channels into our suppliers may involve more high-risk areas. In addition our suppliers themselves are likely to be at a higher risk of involvement with modern slavery, in particular our repair network due to the nature of the business and reliance on staff from outside of the UK.

As a result, all of our suppliers are contracted to meet the requirements of modern slavery legislation; to provide safe working conditions; treat workers with dignity and respect; and act ethically and within the law in their use of labour. Our suppliers are also required to be able to demonstrate adherence to these contractual obligations on demand.

In order to ensure strict adherence to modern slavery principles and their contractual obligations, all of our suppliers are subject to quarterly audits which specifically include coverage of modern slavery principles.

Violations of our expected standards by suppliers will be investigated by the Commercial Director and serious breaches will likely lead to the termination of the business relationship.

**Risk Management**

Adherence to Modern Slavery legislation is a key risk monitored through the Corporate Risk Register in accordance with the Risk Management Policy. The management and monitoring of all key risks is an essential component of the internal governance framework, as such Modern Slavery features within the regular risk meetings held by the Risk Committee as well as the regular Board and Executive meetings.

The regular production and review of the Director’ Register of Interest at Board meetings also ensures there is regular consideration of Modern Slavery principles during the onboarding process of potential business partners and suppliers.

**Due Diligence**

We undertake robust due diligence when considering appointing a new supplier/business partner as per our Contracts Approval and Monitoring Policy and we regularly review the performance of our existing suppliers. Our due diligence and performance reviews include:

* Mapping the supply chain broadly to assess product or geographical risks of modern slavery and human trafficking
* Evaluating the modern slavery and human trafficking risks of each new supplier
* Reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping.
* Conducting supplier audits or assessments through our own staff/third party auditors, which have a greater degree of focus on slavery and human trafficking where general risks are identified
* Creating an annual risk profile for each supplier
* Taking steps to improve substandard suppliers' practices, including providing advice to suppliers through third party auditors and requiring them to implement action plans
* Participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking
* Using ethical supplier databases, where suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular; and
* Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

**Recruitment**

We only use specified, reputable employment agencies to source labour and always verify the practices of any new agency before accepting workers from that agency. Our Employment, Recruitment, Vetting and Screening Policy ensures we bring new members of our workforce into S&G Response in an appropriate manner.

**Whistleblowing**

Given their proximity to our suppliers, our frontline employees are the most likely to be exposed to scenarios where modern slavery may be identified. Therefore, it is paramount that all employees know how to raise any concerns they have and the proper procedure do to so.

Our Whistleblowing Policy and supporting procedure sets out a clear and concise procedure for employees to follow in order to make disclosures, without fear of victimisation or retaliation, including directly to the Managing Director and/or Independent Chairman at any time.

We encourage all our employees, customers, suppliers, business partners and others to report any concerns related to our activities or those of our supply chain partners without delay. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.

1. **Monitoring**

Our approach to Modern Slavery legislation is monitored through the Corporate Risk Register. The management and monitoring of all key risks is an essential component of the internal governance framework, which ensures our approach to Modern Slavery is reviewed on a regular basis by the Compliance Team and subsequently the Board.

1. **Reporting**

The Policy Owner with support from the Compliance Team, is responsible for regularly reporting on the business-wide adherence with this policy, as well as the effectiveness of the supporting control environment, to both the Executive and to the Board.

1. **Training and awareness**

# S&G is committed to ensuring that all of the workforce are provided with adequate guidance and training on Modern Slavery and Human Trafficking and their responsibilities to effectively manage the risk. This includes training within the induction programme for all new starters and regular, at least annual, training for all existing members of the workforce.

# As previously noted, frontline employees have the most interaction with our suppliers and as such it is imperative that the whole business understands what Modern Slavery is and what the warning signs are. Our training programme is designed specifically with this in mind.

1. **Roles and Responsibilities**

Workforce – must always ensure that they read, understand and comply with this policy and raise concerns as soon as possible if they believe or suspect that a breach or conflict with this policy has occurred or may occur in the future.

Policy Owner – must, with support from the Compliance Team, ensure this policy is continuously maintained and kept up to date with any relevant changes. For example, externally if there is a change in the legal or regulatory environment, or internally if there any changes for example to referenced/related documents or changes to key processes, procedures, training or roles and responsibilities. The Policy Owner is also responsible for regularly reporting on adherence with the policy and the supporting control environment.

Compliance Team – must support and maintain this policy, with input from the Policy owner. The Compliance Team are also responsible for maintaining all supporting relevant records.

Head of People – must maintain the Disciplinary Procedure and Workforce Vetting and Screening Policy, and in conjunction with the Head of Learning & Development maintain and deliver all relevant training.

Board – maintain oversight of this policy on a regular basis and ensure there is regular oversight of all associated risks, via the Risk Register.

1. **Referenced documents**

* Business Principles
* Corporate Values
* Supplier Agreements
* Corporate Risk Register

1. **Related policies**

* Risk Management Policy
* Contracts Approval and Monitoring Policy
* Employment, Recruitment, Vetting and Screening Policy
* Whistleblowing Policy