

Modern Slavery and Human Trafficking Policy

GPW0023.2



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1. Purpose of this Policy

Modern slavery is an offence under the Modern Slavery Act 2015 (the “Act”). Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain. This document sets out the policy of GPW Design Services Ltd (the “Company”) with the aim of the prevention of opportunities for modern slavery to occur within its businesses or supply chain. This policy’s use of term “modern slavery” has the meaning given in the Act.

GPW Design Services Ltd have a zero-tolerance approach to modern slavery, which will be communicated to all employees, suppliers, contractors and business partners. 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 that modern slavery is not taking place anywhere in our own businesses or those of our suppliers.

2. Steps for The Prevention of Modern Slavery

GPW Design Services Ltd are committed to ensuring there is transparency in our business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all our contractors, suppliers and other business partners. GPW Design Services Ltd are evolving and updating our contracting processes to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, we expect our suppliers to hold their own suppliers to the same high standards.

All team members have an obligation to familiarise themselves with our procedures to help in the identification and prevention of modern slavery and to conduct business in a manner such that the opportunity for and incidence of modern slavery is prevented. Adherence to this policy forms part of all team members’ obligations under their contract of employment.

Whilst recognising our statutory obligation to set out steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not control the conduct of individuals and organisations in our supply chains. To underpin our compliance with practical steps, GPW Design Services Ltd intend to implement the following measures;

- ✓ Conduct risk assessments to determine which parts of our business and which of our suppliers are most at risk of modern slavery so that efforts can be focused on those areas;
- ✓ Engage with our suppliers to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses;

- ✓ Where appropriate, as informed by own risk assessment, seek to introduce supplier pre-screening and self-reporting for our suppliers on safeguarding controls;
- ✓ Introduce contractual provisions for our suppliers to confirm their adherence to this policy and accept our right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion.

3. Responsibility for the Policy

Ultimate responsibility for the prevention of modern slavery rests with the Company's leadership. The Managing Director of the Company has overall responsibility for ensuring this policy and its implementation comply with our legal and ethical obligations.

Managers 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.

4. Actions to Report Modern Slavery or Human Trafficking

The Company's Whistleblowing procedure is intended to provide guidance on how concerns can be communicated to the Company. Concerns about suspected modern slavery associated with the Company or our suppliers may be reported by employees in this manner. The Whistleblowing Procedure applies to employees upon request.

Employees should approach their Divisional/Line Manager. In extreme circumstances, the Managing Director should be informed. The nature of the complaint will determine the Company's next course of action.

5. Safeguarding

GPW Design Services Ltd aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy. We 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 our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or unfavourable treatment connected with raising a concern. GPW Design Services Ltd will accept and take seriously concerns communicated anonymously, **however, retention of anonymity does render investigations and validation more difficult and can make the process less effective** - individuals are therefore encouraged to put their name to allegations.

Any claims or allegations made which are found to be malicious will result in disciplinary action being taken against the individual.

Thank you. Ready to recruit?

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