

MODERN SLAVERY POLICY

Policy

- This policy can be issued to employees to explain the company's stance in relation to modern slavery. This document should be completed after reading the document Modern Slavery – General Information.
- If you would like to make any amendments to this policy please contact our HR Policy & Documentation team on 0161 819 4671 who will be happy to bespoke this to your requirements.
- Need additional training? Click here to access your free CPD accredited e-learning sessions available on [Peninsula OnDemand](#)
- For quick answers to your HR questions, try our innovative AI based platform, BrAInbox. Just type in your question and get your answer, fast. [Try it today](#)

MODERN SLAVERY STATEMENT

N.B. INFORMATION DETAILED IN ITALICS NEEDS TO BE AMENDED TO REFLECT YOUR BUSINESS.

A) ORGANISATION

This statement applies to [*Company Name*] (referred to in this statement as ‘the Organisation’). The information included in the statement refers to the financial year [*insert financial year*].

OR

This statement applies to all companies within and associated to [*Company Name*] (referred to in this statement as ‘The Group’). The information included in the statement refers to the financial year [*insert financial year*].

B) ORGANISATIONAL STRUCTURE

[*Insert business structure. Consider things like whether there is one centralised office from which location all employees work; are there branches across the country; are there different divisions within the same organisation? If the organisation is part of a group, explain the hierarchy and where your organisation fits into it. Include information about the senior management level e.g. The Organisation is controlled by a Board of Directors*].

[*Include content on the location of the organisation’s offices, including those in the United Kingdom and abroad; if it is only within the United Kingdom, but there are multiple sites, include the regions where these are within the United Kingdom*].

[*Give an explanation of the activities that the organisation carries out and whether any of the operations are seasonal e.g. The main activity carried out by the Organisation is the sale of men’s, women’s and children’s clothing and footwear, in addition to male grooming products and female cosmetics. The Organisation performs the sale of the aforementioned goods both in store and via its website. Demand for our product is consistently high throughout the year and is therefore not seasonal.*]

The labour supplied to the [*Organisation/Group*] in pursuance of its operation is carried out in [*insert locations where work is carried out e.g. if your organisation sends employees to other countries to carry out work, include those countries. If work is wholly carried out in the United Kingdom, state that fact, together with the applicable regions.*]

C) DEFINITIONS

The [*Organisation/Group*] considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse of the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restriction placed on freedom of movement.

D) COMMITMENT

The [*Organisation/Group*] acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The [*Organisation/Group*] understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The [Organisation/Group] does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the [Organisation/Group] in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The [Organisation/Group] strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in [insert countries where your employees are situated], [and in many cases exceeds those minimums in relation to its employees].

E) SUPPLY CHAINS

In order to fulfil its activities, the [Organisation/Group]'s main supply chains include those related to [insert nature of your organisation's supply chains e.g. the supply of clothing and goods from various suppliers in both the United Kingdom and China.] [Explain the make-up and complexity of the supply chain e.g. We understand that the [Organisation/Group] first-tier suppliers are intermediary traders and therefore have further contractual relationships with lower-tier suppliers].

[If you have an agreement with a trade union in relation to bargaining terms and conditions, state this fact and define the bargaining unit to which the agreement relates].

F) POTENTIAL EXPOSURE

The [Organisation/Group] considers its main exposure to the risk of slavery and human trafficking to exist [insert areas of highest risk of exposure and why e.g. in its clothing supply chains because they involve the provision of labour in a country where protection against breaches of human rights may be limited].

In general, the [Organisation/Group] considers its exposure to slavery/human trafficking to be [relatively limited/relatively high]. [Nonetheless], it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

G) IMPACT OF COVID-19

During the reporting period covered by this statement, the COVID-19 pandemic had taken hold. For several months, the UK was placed into lockdown to stem the spread of COVID-19. This created several challenges for the [Organisation/Group], as it did for others across the nation.

The [Organisation/Group] welcomes the UK Government's decision, as confirmed in April 2020, to allow for a delay of up to 6 months in the publication of modern slavery statements without the risk of facing penalty.

EITHER Unfortunately, the [Organisation/Group] assessed that it would need to delay the publication of this statement for the 2019/2020 financial year due to the impact of COVID-19. It has therefore been delayed for [insert duration]. The reason for the delay was [insert reason]. *OR* Despite the permitted, delay, the [Organisation/Group] remains in a position to publish its statement for the financial year 2019/2020 in line with the original publishing requirements.

The [Organisation/Group] concludes that the COVID-19 pandemic [did/did not] adjust the risk of modern slavery to a level above that which existed before the pandemic, which is as set out under 'POTENTIAL EXPOSURE' above. [If applicable, include information on why the risk of modern slavery increased or did not increase e.g. its use of suppliers increased due to the fact that demand for our services was significantly higher than normal. Accordingly, the [Organisation/Group] engaged additional temporary labour from employment agencies in order to meet the need of its customers OR its use of suppliers dropped significantly due to the fact that homeworking was swiftly implemented in March 2020 which meant that its premises, from which it usually conducts day to day business, were temporarily closed. Several of our workforce were placed on furlough as a result of the drop in demand for our services, meaning there were no additional temporary labour needs.

During the pandemic, the Group's employees still had access to the grievance procedure to raise any concerns that they may have had.

In line with emergency legislation passed by the Government, Group employees have been paid Statutory Sick Pay during periods of self-isolation where it has not been possible to agree a temporary period of homeworking. *[If applicable - the [Organisation/Group] took the decision from the outset of the pandemic to ensure that all of the workforce who were required to self-isolate in accordance with public health guidelines continued to receive full pay during their absence.]*

The *[Organisation's/Group's]* modern slavery risks were subject to the same monitoring procedures during the pandemic as at all other times.

H) STEPS

The *[Organisation/Group]* carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

The *[Organisation/Group]* has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the *[Organisation/Group]* has taken the following steps to ensure that modern slavery is not taking place:

- *[Insert steps ordinarily taken, in addition to any extra steps taken in response to an increased risk of modern slavery encountered due to COVID-19]*

[The above could include steps relating to:

- *reviewing your supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery;*
- *measures in place to identify and assess the potential risks in its supply chains;*
- *undertaking impact assessments of its services upon potential instances of slavery;*
- *creating action plans to address risk to modern slavery;*
- *any actions taken to embed a zero tolerance policy towards modern slavery;*
- *If you have taken no steps, this fact should be stated.]*

I) KEY PERFORMANCE INDICATORS

The *[Organisation/Group]* has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in the *[Organisation/Group]* or its supply chains.

- *[Insert the ways that you will be able to evaluate how effective you have been in ensuring modern slavery does not occur]*

J) POLICIES

The *[Organisation/Group]* has the following policies which further define its stance on modern slavery *[include links to any policies which may relate to your commitment to eradicating slavery e.g. a modern slavery policy; a corporate social responsibility policy; supplier code of conduct; recruitment policy].*

K) TRAINING

The *[Organisation/Group]* provides the following training to staff to effectively implement its stance on modern slavery *[insert details of training provided on modern slavery e.g. induction training, training on modern slavery policies].*

L) SLAVERY COMPLIANCE OFFICER

The [*Organisation/Group*] has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the [*Organisation/Group*] obligations in this regard.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Date of approval.....

Signed.....

[Insert title]

Date.....