



Modern Slavery Policy

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1.0	New policy	December 2017	Julie Rees

Related Documents

Version	Reference	Name	Date
7.0	HR011	Disciplinary Policy	April 2017
8.0	HR011a	Disciplinary Procedure	April 2017
1.0	HR013	Whistleblowing Policy	November 2017
1.0	HR013a	Whistleblowing Procedure	November 2017
3.0	HR026	Anti-Bribery Policy	May 2015
3.0	HR026a	Anti-Bribery Procedure	May 2015
3.0	HR005	Right to Work checking Policy	November 2017
3.0	HR005a	Right to Work Checking Procedure	November 2017
	HR024	Safeguarding Policy	April 2017
	HR024a	Safeguarding Procedure	April 2017

1. Policy Statement

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third party representatives and partners.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

2. Our Values

The Parkwood Group are conscious that what we do has a real impact on the wider world around us and that the decisions we make can often affect the lives of people and communities. We believe we have a responsibility to ensure that our business makes a positive contribution to those affected by our activities and that we take proactive steps to address circumstances where this is not the case.

It is one of our core values that all of our employees deserve the right to live and work with dignity and respect and we believe this ethos should equally apply to the employees of our suppliers, business partners and wider supply chain. We recognise that it is our responsibility to encourage this kind of working environment and that we should take steps to ensure that sound social and ethical practices are upheld, not only within our own operations, but also within our supply chain.

3. Definitions

The following definitions are applicable to this policy:

Slavery means the status or condition of a person over whom any or all of the powers attaching to the right of ownership are exercised. This includes practices such as forced labour, debt bondage, the sale or exploitation of children and descent-based slavery.

Forced labour means all work or service which is exacted from any person under the menace of any penalty for which that person has not offered themselves voluntarily. A penalty could be a physical constraint or it could take the form of other abuse such as threats of deportation, passport confiscation or wage non-payment that binds a worker to the employer.

Human trafficking involves the movement of a person, either across international borders or within the boundaries of a single country, by means of threat, deception or abuse of vulnerability, for the purpose of exploitation.

4. Our commitment

The Parkwood Group does not tolerate any form of slavery, forced labour or human trafficking, whether directly within our own business or within the operations and activities of our suppliers, business partners and wider supply chain, whether within the UK or overseas.

We are committed to taking steps to ensure that slavery, forced labour and human trafficking does not take place within our supply chain or other parts of our business.

We will take steps to verify, evaluate and assess the risk of slavery, forced labour and human trafficking occurring within our supply chain and we expect our suppliers and business partners to co-operate and collaborate with us to achieve this. We also expect our suppliers and business partners to take their own proactive steps to investigate their own supply chains.

Where we have suspicions that any supplier or business partner is engaging or implicated in any incident of slavery, forced labour or human trafficking, we will undertake investigations and take appropriate action. This may take the form of providing our support to ensure improvements are made, making reports to the relevant legal authorities and if necessary terminating our business relationships where issues are not resolved to our satisfaction.

We will encourage all of our employees, suppliers, business partners, competitors, customers, the general public and other interested parties to raise any genuine concerns or suspicions that they may have about our procurement practices, in complete confidence.

Whilst we appreciate that this process will be a long term and ongoing project which will take time to complete in collaboration with a number of stakeholders, we undertake to always be open, honest and transparent as to the findings of our supplier audits and investigations

Any employee who breaches this policy will face disciplinary action, which could result in dismissal.

5. Compliance with the Policy

You must ensure that you read, understand and comply with this policy.

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 us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of the business, Group or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur you must notify you manager or report it in accordance with this policy.

If you are 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, raise it with your Manager.

We 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. We are committed to ensuring no one suffers any detrimental treatment as a result 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 the Group, Business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

6. Implementation

In order to achieve our objective of tackling slavery, forced labour or human trafficking, we will:

- require all of our suppliers to provide an annual self-certification confirming that they are not aware of any incidents of slavery, forced labour or human trafficking occurring within their business and own supply chain;
- undertake regular reviews of our supply chain and identify any potential risks. Those suppliers that are identified will be allocated a risk profile based on the information available to us and monitored;
- where suppliers fall short of our expectations, require a remediation plan be prepared, implemented and reviewed to address any shortcomings highlighted;
- provide relevant employees with training to recognise the any signs of slavery, forced labour or human trafficking within our supply chain and encourage practices to mitigate the risk of this occurring;
- The Parkwood Group encourages anyone to raise any concerns about modern slavery and will support anyone who acts in good faith. The Parkwood Group has a whistleblowing policy which can be used to report any instances of modern slavery;
- publish the results of any audits and investigations undertaken as part of our annual AntiSlavery and Human Trafficking Statement.