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**Modern Slavery and Human Trafficking**

**Policy**

**INTRODUCTION**

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We 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, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This is F&P`s statement on slavery and human trafficking and is made pursuant to section 54(6) of the Modern Slavery Act 2015. It sets out F&P actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1st May 2020 to April 30th, 2021.

We are proud of the steps we are taking to combat slavery and human trafficking and are committed to reviewing our practices on an ongoing basis to improve our practices and eliminate risks.

**ORGANISATION’S STRUCTURE**

F&P was first established in 2013.

We are a Limited company with three Directors. We have six directly employed employees, we only work within the UK. We do from time to time use subcontractors.

Our annual turnover is less than £36m.

**OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

Relevant Policies

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

* HR Policy – We promote our Modern Slavery Policy within our Employee Handbook which is available to all employees and is provided upon commencement of employment. We have zero tolerance of any threat of physical or sexual violence, harassment, or intimidation against employees and their family, or close associates. Our policies are clearly defined and communicated to all employees. All our employees are treated fairly and equally and are paid at least the national minimum wage. Our employees won`t be forced to work in- excess of the number of hours permitted in law, and normal working hours won`t exceed 48 hours per week average unless the employee agrees.
* Purchasing Policy- The organisation is committed to conducting purchasing activities in a fair, objective, and transparent manner that satisfies the requirements of accountability and internal controls including but not limited to Quality Management, Environmental, Ethical Code of Practice, Anti Bribery and Modern Slavery and Human Trafficking Policies which fulfil legal and financial obligations on selecting suppliers and service providers that demonstrate recognisable environmental, sustainable ,business integrity along with Corporate Social Responsibility (CSR) standards, including but not limited to compliance with laws and regulations, respect for human rights, labour working conditions, equal opportunities, health and safety accreditation, maintenance and promotion of information security, fair trade and acceptable corporate ethics.
* Recruitment policy- The organisation uses only specified, reputable employment agencies to source agency workers and always verifies the practices of any new agency it is using before accepting workers from that agency.
* Whistleblowing Policy- We encourage all of our employees, customers and other partners to report any concerns related to our direct activities, or supply chains, this includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for employees to make disclosures, without fear of retaliation.

We will look to review and develop existing policies for procurement, recruitment, whistleblowing, equal opportunities etc, and where necessary make changes or introduce explicit references to modern slavery. We will also look to introduce new policies as and when they are relevant and as our understanding of the issues and the approaches we need to take.

**OUR SUPPLY CHAINS**

At F&P we will conduct our business in a responsible manner which respects and rewards our employees, works with the communities in which we operate, respects our trading partners, suppliers, customers, and other stakeholders, and ensures that our environmental impact in the world in which we work is minimised.

We have to sustain the business through making profit which in turn is used to support all the other objectives.

As part of our initiative to identify and mitigate risk, we have carried out a review of our supply chains to identify and assess any potential risks for slavery and human trafficking. We have then taken the steps outlined below in our Anti-Slavery Policy to mitigate the areas of risk identified.

Employees

We comply with, as a minimum, all employment law requirements in the United Kingdom and honour important rights such as national minimum wage and paid holiday requirements. We also ensure that all our employees have the right to work in the UK.

Agency workers and subcontractors

We are committed to ensuring that any employment agencies which we may use, supply us with workers and any sub-contractors are advised of our Anti-Slavery Policy and confirm that they will comply with its terms or show a similar commitment to eliminating slavery and human trafficking in their business and own supply chain.

We expect all employment agencies to comply with their own obligations under UK law in respect of their business, including all agency regulations and employment laws.

Material Suppliers

We are aware that the fact that some of the materials we purchase are ultimately sourced from countries where there is greater risk of modern slavery or human trafficking. We are accordingly committed to ensuring that all suppliers are advised of our Anti-Slavery Policy and confirm that they will comply with its terms or show a similar commitment to eliminating slavery and human trafficking in their business and own supply chain.

**Risk assessment/Due diligence**

We are committed to ensuring as far as we are able that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.  
Our Whistleblowing Policy also ensures that any concerns that our employees, contractors, or suppliers may have can be raised without fear of retribution or being subjected to a detriment as a result.

SUPPLIER ADHERENCE TO OUR VALUES

We have zero-tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we are requiring all of our suppliers, whether identified as high or low risk, to confirm that they will comply with our Anti-Slavery Policy.  
If they are unable to commit to complying with our own Anti-Slavery Policy, we expect them to show and evidence a similar or greater commitment to eliminating the risk of modern slavery in their business and their own supply chain.  
If they fail to confirm that they will comply with our Anti-Slavery Policy and are unable to demonstrate, to our satisfaction, a similar or greater commitment to eliminating modern slavery, then those suppliers will not receive any further payments from ourselves and be removed from our approved supplier list.

**TRAINING**

The board of directors has had training on the risks of modern slavery and human trafficking in our supply chains and our business.

The Employee Code of conduct of the business, and our values and standards contained within our Employee Handbook set out the behaviours we expect from employees in their dealing with work colleagues, customers, clients, suppliers, visitors etc. The handbook has also been updated to include GDPR. All existing employees have been provided with a copy of our Anti-Slavery Policy. All new employees will be advised of the importance of our policy as part of their induction and will be expected to sign that they have read and understood the Employee Handbook, including our commitment to eliminating modern slavery.

We provide ongoing guidance and support to all our employees whether employed directly or through agencies in understanding expected behaviours and encourage them to report any unethical behaviour.

**OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING**

We are committed to ensuring that we have been effective in ensuring that slavery and human trafficking is not taking place in any part of our business supply chains.

We will continue to monitor our procedures and our suppliers and review our policies as more information is made available to us or make changes as the law requires it.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the F& P slavery and human trafficking statement for the financial year ending April2021

**Signed for, and on behalf of, the board of Directors**.

Name:

Date: