

# ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

# POLICY AIM

The aim of this policy is to help CIMSPA act in accordance with the Modern Slavery Act 2015, maintain the highest possible standards of business practice, and advise individuals of CIMSPA's 'zero-tolerance' to slavery and human trafficking.

## 1. What is modern slavery?

1.1 Modern slavery is a crime and a fundamental breach of human rights.

1.2 Modern slavery includes

1.2.1 slavery (asserting ownership over a person,

1.2.2 depriving them of their freedom),

1.2.3 servitude (providing services under coercion including living in a person's property and the victim being unable to change their position)

1.2.4 forced labour (working under the threat of a penalty non-voluntarily) and

1.2.5 human trafficking (arranging the travel of another person with a view to them being exploited).

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

## 2. Modern Slavery

2.1 We take a zero-tolerance approach to modern slavery in all its forms. We are committed to acting ethically and with integrity in all our business dealings and relationships ensuring no form of modern slavery is allowed to occur anywhere in our own business or in any of our supply chains.

2.2 We encourage transparency in our business practices and in our supply chains. We never knowingly deal with any business – either as part of our supply chain or by being part of that business' supply chain – who is involved in modern slavery in any form, or supports or otherwise turns a blind eye to modern slavery, and expect the businesses in our supply chain to act with the same ethical standards and integrity.

2.3. Prior to entering into arrangements with a supplier we consider carefully whether there is any risk that it might be engaging or otherwise involved in any form of modern slavery and what steps it takes to mitigate the effects of modern slavery in its business.

2.4 It is our policy to promote ethical working. In each case where we have a written contract with a business in our supply chain, we will consider whether it is necessary to impose strict contractual conditions relating to ethical wording into such contract, and will add those if appropriate. In particular, we consider it implied into all of our dealings that our supply chain does not use forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children.

2.5 We require all our suppliers in our supply chain to hold their own suppliers to the high standards as set out in this policy.

2.6 We aim to communicate our zero-intolerance approach to modern slavery to all suppliers, contractors and partners at the outset of our business relationship, and thereafter as appropriate.

2.7 We are committed to improving our practice to combat modern slavery and welcome any suggestions of ways in which we could do so.

### **3. Detection of modern slavery**

3.1 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 otherwise under our contract. All members of staff are required to avoid any activity which might lead to, or suggest, a breach of this policy.

3.2 All members of staff have an obligation to ensure that any instance of modern slavery, or any suspicion of acts in contravention of this policy are brought to the attention of their line manager immediately.

3.3 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within our business or within any of our supply chains constitutes any form of modern slavery, you should speak with your line manager.

3.4 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 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. That said, if concerns raised are found to be

malicious, that will be treated as an act of misconduct for which disciplinary action will follow.

3.5 The People Development Manager has day to day responsibility for informing team members of the policy, its aims and the role of members of staff in implementing and monitoring the policy. Any questions regarding the policy, should be directed to the People Development Manager in the first instance. Overall responsibility for ensuring this policy complies with our legal and ethical obligations, and those under our control comply with it, lies with the board of directors.

## 4. Breaches of the policy

4.1 Any employees who breaches this policy may face disciplinary action, and in serious cases, dismissal for misconduct or gross misconduct.

4.2 We may terminate any agreement or arrangement with other individuals and organisations working on our behalf if they breach this policy.

Revised by;	Date adopted	Review Date
Director of Finance & Resources – Kay Simnett	Aug 2022	Q2 2023/24
Chief Operating Officer – Kay Simnett	Aug 2023	Q2 24/25