

# ANTI SLAVERY & HUMAN TRAFFICKING POLICY

ISSUE	REV	DATE	DETAILS OF REVISION	AUTHORISED BY
01	00	02.01.17	Draft Issue of New Format	Julie Lewis
01	01	04.01.17	Final Issue of New Format	Mark Skinner
01	02	22.01.18	2018 Review	Mark Skinner
01	03	20.01.19	2019 Review	Mark Skinner
01	04	22.01.20	2020 Review	Mark Skinner
01	05	04.01.21	2021 Review	Mark Skinner
01	06	12.01.22	2022 Review	Mark Skinner
01	07	05.01.23	2023 Review	Mark Skinner
01	08	12.01.24	2024 Review	Mark Skinner

#### **The Modern Slavery Act 2015**

The act came into effect in October 2015. G&L Consultancy Ltd is committed to a work environment that is free from human trafficking, forced labour and unlawful child labour (collectively 'human trafficking and slavery'). G&L Consultancy Ltd believes that it has a responsibility to promote ethical and lawful employment practices.

G&L Consultancy Ltd will not knowingly use unlawful child labour or forced labour in any of the utilities and / or other commodities, products and / or services it provides, nor will it knowingly accept commodities, products and / or services from suppliers that employ or utilise child labour or forced labour.

This policy sets out the high standards of behaviour and integrity that G&L Consultancy Ltd requires from its employees concerning the Modern Slavery Act 2015 to prevent slavery and human trafficking. G&L Consultancy Ltd also requires its suppliers and contractors to respect and follow this policy statement as a core term of any contracts that they may have with any member organisation or business supply chains

#### **Rationale**

Human trafficking and slavery are crimes under UK and international law. These crimes exist in countries throughout the world. This policy statement defines G&L Consultancy Ltd's commitment to ensuring that human trafficking and slavery do not exist within its own business but also details how G&L Consultancy Ltd will make efforts to eradicate the same from other businesses with whom it shall maintain a relationship. G&L Consultancy Ltd will take appropriate steps to ensure not only its compliance but also that its suppliers, and subcontractors, follow these requirements and / or business partners (collectively by its 'Suppliers'). All suppliers are therefore required to adhere to the following.

#### **Definitions**

*Human Trafficking:* The recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, abduction, fraud, deception, the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation.

*Forced Labour:* All work or service, not voluntarily performed, that is obtained from an individual under the threat of force or penalty.

*Harmful Child Labour:* Consists of the employment of children that is economically exploitative, or is likely to be hazardous to, or interfere with, the child's education, or to be harmful to the child's health, or physical, mental, spiritual, moral, or social development.

#### **Steps for the Prevention of Modern Slavery**

We are committed to ensuring there is transparency in our own 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 of our contractors, suppliers and other business partners, and we 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 require our suppliers to hold their own suppliers to the same high standards.

Whilst recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking are 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, we intend to implement the following measures:

- a) 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;
- b) engage with our suppliers both to convey to them our Anti-Slavery and Human Trafficking Policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses and their supply chain;
- c) introduce supplier pre-screening (for example as part of our tender process) and self-reporting for our suppliers on safeguarding controls;
- d) 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.

#### **Responsibility for the Policy**

The ultimate responsibility for the prevention of modern slavery rests with the company's leadership. The Directors of G&L Consultancy Ltd have 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.

#### **Actions to Report Modern Slavery or Human Trafficking**

##### Internal

Employees are encouraged to raise any concerns about suspected modern slavery associated with the company or our suppliers and should do this either through their line manager or by contacting their Representative of Employee Safety.

##### External

Members of the public or people not employed by the company can write, in confidence (either via e-mail: [info@gnl.org.uk](mailto:info@gnl.org.uk) or to the registered office) to raise any concern, issue or suspicion of modern slavery in any part of our business or related supply chain.

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 any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

G&L Consultancy Ltd will accept and take seriously concerns communicated anonymously. However, the retention of anonymity does render investigations and validation more difficult and can make the process less effective. Individuals are therefore encouraged to put their names to allegations.

#### **Breaches of this Policy**

If an issue is identified with a supplier, we will work with them to prepare a corrective action plan and resolve all violations within an agreed-upon time period.

We reserve the right to terminate our relationship with individuals and organisations in our supply chain if they breach this policy.

#### **Communication and Awareness of this Policy**

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

This statement will be displayed in the main office and reviewed annually or earlier if significant business changes warrant it, any revisions will be brought to the attention of staff. Copies of this policy will be held in all offices and available to all staff.

This policy has been endorsed by Julie Lewis and has the full support of the management team.

## MANAGEMENT POLICY

### ANTI SLAVERY & HUMAN TRAFFICKING POLICY

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The policy was reviewed and approved on 15<sup>th</sup> January 2024 following consultation with senior managers and workers.

Overall responsibility for the effectiveness of the policy lies with Julie Lewis, Quality Director. For more information, please contact this person: 01823 443 898

Director	Name	Signature	Date
Quality Director	Julie Lewis	<i>Julie Lewis</i>	15 <sup>th</sup> Jan 2024
Technical Director	Paul Lewis	<i>Paul Lewis</i>	15 <sup>th</sup> Jan 2024
Somerset Office	Name	Signature	Date
Health, Safety and Quality Manager	Mark Skinner	<i>Mark Skinner</i>	15 <sup>th</sup> Jan 2024
Operations Manager	Darren Alway	<i>Darren Alway</i>	15 <sup>th</sup> Jan 2024
Client Liaison Manager	James Ooyman	<i>James Ooyman</i>	15 <sup>th</sup> Jan 2024
Finance and HR Manager	Sally Monger	<i>Sally Monger</i>	15 <sup>th</sup> Jan 2024
Asbestos Removal & Air Test Manager	Jason Monger	<i>Jason Monger</i>	15 <sup>th</sup> Jan 2024
Training Manager	Jack Leese	<i>Jack Leese</i>	15 <sup>th</sup> Jan 2024
Survey Manager	Jo Haigh	<i>Jo Haigh</i>	15 <sup>th</sup> Jan 2024
Northern Ireland Office	Name	Signature	Date
Northern Ireland Director	Alan Lewis	<i>Alan Lewis</i>	15 <sup>th</sup> Jan 2024
Business Development & Personnel Manager	Karen Lewis	<i>Karen Lewis</i>	15 <sup>th</sup> Jan 2024
Lab Manager	Colin Webb	<i>Colin Webb</i>	15 <sup>th</sup> Jan 2024
Deputy NI Branch Manager	John McAleenan	<i>John McAleenan</i>	15 <sup>th</sup> Jan 2024