



# MODERN SLAVERY AND HUMAN TRAFFICKING POLICY



INTEGRITY



PRIDE



RESPECT

# MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

<b>Associated Group Policies:</b>	Colleague Handbook Whistle Blowing Policy Equality, Diversity & Inclusion Policy	<b>IMS Reference:</b>	IMSM07
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## Glossary of Terms

Term / Acronym	Definition / Meaning
The Nurture Group 'Nurture'	Nurture Group including Nurture Landscapes Limited, Gavin Jones Limited, Rokill Limited.
HSQE Manager	Health, Safety & Quality Manager

### 1 Introduction

- 1.1 Anti-slavery policies were introduced by the government in the United Kingdom in 2015 under the Modern Slavery Act 2015. These policies were set out to ensure organisations supply chains are slavery free.
- 1.2 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.
- 1.3 Nurture is also committed to ensuring there is transparency in its own business and in its approach to tackling modern slavery throughout its supply chains, consistent with disclosure obligations under the Modern Slavery Act 2015.
- 1.4 Nurture expects the same high standards from all its contractors, suppliers and other business partners, and as part of its contracting processes, Nurture includes specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and Nurture expect that its suppliers will hold their own suppliers to the same high standards.
- 1.5 This policy applies to all persons working for Nurture or on our behalf in any capacity, including colleagues at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, external consultants, third-party representatives, and business partners.

### 2 Purpose and Scope

- 2.1 This policy reflects the organisations commitment to acting ethically and with integrity in all business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in the organisations supply chains.

### 3 Roles and Responsibilities

CPO	Has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
The Senior Leadership Team	Has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
Line Managers	Management 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 in supply chains.
Colleagues	All colleagues employed within the Nurture group are asked to familiarise themselves with the Modern Slavery policy at the start of their employment and are contractually obligated to adhere to the policy and attend training as and when required.

## 4 Process

### 4.1 Compliance with the policy

All colleagues must read, understand, and comply with this policy. The prevention, detection, and reporting of modern slavery in any part of our organisation or supply chains is the responsibility of all those working for Nurture or under our control. Colleagues are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Colleagues must notify their line manager OR a Company Director as soon as possible if there is reasonable belief or suspect that a conflict with this policy has occurred or may occur in the future.

Colleagues are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our organisation or supply chains of any supplier tier at the earliest possible stage.

### 4.2 Our Due Diligence and Risk Assessment

Nurture has a zero tolerance to illegal working and our onboarding procedure follows the home office guidance.

- Right to work checks are conducted either prior or on day one of the onboarding process to ensure that our colleagues are lawfully in the UK and have the right to work. We also carry out reference checking and where applicable DBS checks.
- All colleagues must have their own personal bank account, payments will not be made anywhere else. Action is taken if issues are identified.
- We use well known and long-established recruitment agencies or direct recruitment methods which we believe reduce the risks of modern slavery in our work teams.

### 4.3 Training

- Modern Slavery training is completed during colleague induction.
- We have implemented a new digital training platform for managers, which includes modules on Modern Slavery, Whistleblowing, and Recruitment.
- Further training is being developed for the operational teams due for implementation 2023

## 5 Breaches of this policy

5.1 Any colleague who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

5.2 Nurture may terminate its relationship with other colleagues and organisations working on its behalf if they breach this policy.

## 6 Reporting modern slavery within Nurture or its suppliers

6.1 Nurture's modern slavery and human trafficking policy and whistleblowing policies are intended to provide guidance on how concerns can be communicated to the organisation. Concerns about suspected modern slavery associated with the organisation or its suppliers may be reported by colleagues in this manner.

6.2 The policies that apply to colleagues can be found on the document register or the Bravo website. Any suspected instance of modern slavery or human trafficking within Nurture or its suppliers must be reported to a line manager, the HSEQ manager [robin.jackson@nurturelandscapes.co.uk](mailto:robin.jackson@nurturelandscapes.co.uk) or the HR team, [HR@Nurture-group.co.uk](mailto:HR@Nurture-group.co.uk), who will investigate and advise of any further actions.

6.3 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.

- 6.4 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.
- 6.5 Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your line manager immediately. If the matter is not remedied, it should be raised formally using the Grievance Procedure, which can be found in the current colleague handbook.

## 7 Monitoring and Auditing

- 7.1 The CPO has responsibility for ensuring this procedure is implemented accordingly and monitored appropriately.

## 8 Compliance

- 8.1 Adherence to this Policy procedure is both an individual and a corporate responsibility. Wilful breach of this policy, or unauthorised departure from the Procedures derived from this Policy, may invoke the disciplinary procedure.

## 9 Review and Improvement

- 9.1 The CPO is responsible for reviewing this procedure. The Modern Slavery Statement and Policy will be reviewed annually in accordance with clause 6 of the Modern Slavery Act 2015 making any recommendations for improvement and presenting these to the ELT / CEO for further consideration.

**Nurture reserves the right to amend or discontinue the Policy and any associated Procedures at any time.**