

RSM Partners

POL35 Modern Slavery Policy

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Version: 1.0





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1 Policy Governance

1.1 Purpose

The purpose of this policy is to provide clear guidance to Directors and Employees with regards to Modern Slavery. This policy will clearly state the expectations of RSM Partners.

1.2 Policy Commencement

This policy will commence with immediate effect, 24th October 2017.

1.3 Application of Policy

This policy applies to all persons working for RSM Partners or on our behalf in any capacity, including employees at all levels, directors, agency workers and contractors.

1.4 Responsibility

The Directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Anyone engaging in the Procurement Process 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 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.

1.5 Current Policy Version

V1.0 Issued

2 Policy Statement

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 in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery, 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 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 policy does not form part of any employee's contract of employment and we may amend it at any time.

2.1 Compliance

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 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 our business 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 your manager.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions constitutes any of the various forms of modern slavery, raise it with your manager or Head of Procurement.

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. 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 the Head of Procurement immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

2.2 Communication and Awareness Of This Policy

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

Breaches of this policy

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

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

3 Document Control

POLICY CONTROL

POLICY HISTORY

Version	Date	Author	Approver	Date Approved
0.1	24/07/17	Sandra Hands	Jennie Holpin	
1.0	24/07/17	Sandra Hands	Jennie Holpin	Final for issue

REVIEW

Name	Role	Date
Jennie Holpin	Support and Managed Services Director	24/07/17
Nick Davies	Financial Director	25/07/17

APPROVAL

Name	Role	Date
Mark Wilson	Technical Director	26/07/17



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