



## **Modern Slavery Policy**

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## **1.0 Scope and Exclusions**

This policy applies to all gbpartnerships group (gbp group) colleagues.

## **2.0 Policy Statement**

gbp group recognises its environmental, health & safety and employment responsibilities and devotes appropriate time and resources towards monitoring compliance and improving existing standards. gbp group have policies which comply with relevant UK and European Human Rights and employment legislation.

As such, gbp group is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking.

gbp group has a zero tolerance approach to Modern Slavery. gbp group is committed to ensuring that our business, including the supply chain, is free of any slavery and/or human trafficking. We will not knowingly support and/or do business with any suppliers who are involved in slavery.

## **3.0 Roles and Responsibilities**

All colleagues are bound to report to their Line Manager or the Group Services and Quality Director any concerns they have around the treatment of workers generally, or their working conditions if they have any suspicion around modern slavery, child labour or forced labour.

This includes any part of gbp group or among its wider stakeholders.

gbp group will provide training on this policy, and on the risk the gbp group business faces from modern slavery in its supply chains.

## 4.0 Risk Across the Business

gbp group is a leading health specialist company organised as follows:

**gbp Develop** - With over 20 years' experience as property investor, developer and owner, we understand the long-term requirements of clients from across sectors and work to remove barriers to deliver best-in-class premises.

**gbp Consult** - Partners with clients across health, local authorities and the wider public sector, to empower people to change practices, processes, and the use of physical assets, in order to embed long lasting organisational transformation.

**gbp Manage** - Asset, project management and sustainability services that play an integral role in supporting high-quality service delivery, tailored to enable our clients to concentrate on what they do best.

The risk of Modern Slavery has been assessed differently to be consistent with the activities they carry out. Awareness and other training applies across all divisions.

### **gbp Develop**

Construction contractors – medium/high risk of modern slavery issues

Professional services – low risk

### **gbp Consult**

Professional services companies – low risk of modern slavery issues

### **gbp Manage**

FM providers and build contractors – medium/high risk of modern slavery issues

## 4.1 Due Diligence

gbp group have a Supplier Code of Conduct, it is designed to ensure that our business partners values are aligned with ours.

### **Child labour**

*The supplier employs no children under the age of 15. If national laws or regulations allow children between the ages of 13 and 15 to perform light work, such work is not permitted under any circumstances if it would hinder a minor from the completion of compulsory schooling or training, or if the employment would be harmful to their health or development (reference: ILO Convention 138(7)).*

### **Forced labour**

*The supplier shall make no use of forced or compulsory labour.*

It is noted that there is a higher risk of modern slavery occurring in the FM and construction industries, therefore colleagues involved in these areas are informed, trained and reminded on how to spot it and what to do.

## 4.2 Contractors Reports

Monthly contractors project reports for gbp Develop and gbp Manage are required to monitor instances of modern slavery. This information is fed into gbp group Board Reports.

## 4.3 Training

All colleagues are regularly reminded, through internal staff communication channels, about what Modern Slavery is, how to spot it and what to do if they suspect it is happening. An information sheet used for this purpose is included in Appendix 1.

In addition to this, it is a requirement that all colleagues complete an annual Modern Slavery training module, which is followed by a test.

## 4.4 Implementation of Policy

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

Should any supplier be found in active participation of modern slavery, gbp group will seek to legally terminate all contracts with them immediately and move to other suppliers.

If the supplier was not aware of the breach, then gbp group may still choose to terminate the relationship with the partner. A decision on this will be made by the executive team based on the risk to the company and the severity and duration of the breach.

## 5.0 Documentation Control

Document Details	
Version	4.0
Document Ref	P67
Policy Prepared by	Stewart Batchelor
Approved by	Wendy Spencer
Date of Approval	29 <sup>th</sup> October 2023
Operational From	29 <sup>th</sup> October 2023
Review Date	29 <sup>th</sup> October 2024

## Appendix 1 – Modern Slavery Information Sheet

The graphic is a grid of information boxes. On the left, a large grey box contains the title 'What is Modern Slavery?' with a question mark. Below it, a smaller grey box defines modern slavery. To the right, a 2x2 grid of orange boxes contains ten redaction questions. Further right, a grey box explains that victims can be of any age, gender, etc., and another explains that construction and cleaning are high-risk industries. On the far right, the 'gb partnerships GROUP' logo is at the top, followed by a grey box with an arrow pointing to the redaction questions, and another grey box providing contact information for the Modern Slavery Helpline and internal reporting procedures.

### What is Modern Slavery?

Modern Slavery is the illegal exploitation of people for personal or commercial gain. It covers a wide range of abuse and exploitation including sexual exploitation, domestic servitude, forced labour and criminal exploitation.

Victims of modern slavery can be any age, gender, nationality and ethnicity. They are tricked or threatened into work and may feel unable to leave or report the crime through fear or intimidation. They may not recognise themselves as a victim.

The construction and cleaning industries are among those most affected by this crime, according to the National Crime Agency.

gbp group will not knowingly support and/or do business with any suppliers who are involved in slavery.

Do workers look unkempt, wear the same clothes every day or wear clothes not suitable for work?

Do workers appear to be under the control of someone else?

Are workers movements controlled?

Are workers reluctant to talk to strangers?

Are workers reluctant to interact with others?

Does someone speak for the workers?

Do workers have personal identification on them?

Does the workplace look like it is being used for accommodation?

Are workers distrustful of and reluctant to talk to the authorities?

Are workers picked up and dropped off for work in groups?

How to spot modern slavery – if you feel something isn't right, ask yourself these questions

gbp group recognise their wider social responsibility, so if you see any of the signs of modern slavery contact the Modern Slavery Helpline confidentially on [08000 121 700](tel:08000121700)

Also, inform your line manager and the Group Services and Quality Director.