

Warwick SASCo Ltd Modern Slavery Policy

Modern slavery is a crime resulting in an abuse of human rights. Modern slavery can take various forms and is used to describe the crimes of slavery, servitude, forced or compulsory labour and human trafficking which we find abhorrent and will not participate in.

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1. Policy Statement

We are committed to acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chain.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain. We expect the same high standards from all our contractors, suppliers and other business partners. 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 and we expect that our suppliers will hold their own suppliers to the same high standards. 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, seconded workers, volunteers, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

The company is a member of Association of British Healthcare Trade Association and is party to Code of Business Practice for Ethical Compliance.

2. Responsibility for the Policy

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

The Purchasing Director has primary and day-to-day responsibility for implementing this Policy, Monitoring Its Use and Effectiveness, Dealing with Queries, And Auditing Internal Control Systems And Procedures To Ensure They Are Effective In Countering Modern Slavery.

Table of Responsibilities And Signatories

Name	Role / Department	RACI	Approval/Training
Darby Booth Or Alex	Managing Director Company Secretary	R, A	
Paul Yeomans	Business Director	A, C	
All Staff	Warehouse, Sales & Operations	I	

R = Responsible for document production; A = Accountable; C = Consulted; I = Informed

Revision

Version	Date	Details of Change	Author
1	22 July 2021		D Booth

Emergency Contact Details

Name	Role / Department	E-Mail	Telephone
Darby Booth	Managing Director	darby@saaco.co.uk	07711638950
Paul Yeomans	Operations Director	paul@sasco.co.uk	07526972307
All Staff	Warehouse, Sales & Operations	I	

Policy Implementation

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given any required training.

3. Due Diligence Processes

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence process includes building long-standing relationships with suppliers, making clear our expectations of business partners, evaluating the modern slavery and human trafficking risks of each new supplier and invoking sanctions against suppliers that fail to improve their performance.

To ensure all those in our supply chain and contractors comply with our values, we have in place a standard clause in all our new agreements with suppliers and contractors which informs them of our commitment to combatting slavery and human trafficking and requires them to agree to this commitment when working with us.

We are committed as a company to tackling modern slavery and human trafficking and want to work with suppliers who share this commitment.

4. Compliance with the Policy

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 or supply chain 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 OR the Procurement Department 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 of suspicion of modern slavery in any parts of our business or the supply chains of any supplier tier 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 or report it in accordance with our Whistleblowing Policy as soon as possible.

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 because 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 part of our supply chain. If you believe that you have suffered any such treatment, you should inform your manager immediately.

5. Training and Awareness

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our organisation and our supply chains, we intend to develop a training and information campaign to help staff to better understand the risks *and how we as an organisation are working to manage this*.

All our staff have been provided with a copy of this policy, which encourages individuals to monitor and report anything untoward. *We also encourage our business partners to provide training to their staff and suppliers.*

Training and Awareness Information

There are several indicators that can be signs that someone is a victim of modern slavery. Some of the key indicators are below. However sometimes it will be a case of acting on your instinct that something is not right and using existing professional skills to talk to a potential victim and find out more information. None of these indicators in isolation or combination can give you complete certainty; however, you do not need to be certain to report your concerns.

Indicators of a potential victim may include:

- Distrustful of authorities
- Expression of fear or anxiety
- Signs of psychological trauma (including post-traumatic stress disorder)
- The person acts as if instructed by another
- Injuries apparently a result of assault or controlling measures
- Evidence of control over movement, either as an individual or as a group
- Restriction of movement and confinement to the workplace or to a limited area
- Passport or documents held by someone else
- Lack of access to medical care
- Limited social contact/isolation
- Limited contact with family
- Signs of ritual abuse and witchcraft (juju)
- Substance misuse
- Person forced, intimidated or coerced into providing services
- Doesn't know home or work address
- Perception of being bonded by debt
- Money is deducted from salary for food or accommodation
- Threat of being handed over to authorities
- Threats against the individual or their family members
- Being placed in a dependency situation
- No or limited access to bathroom or hygiene facilities
- Unwanted/underage pregnancy
- Inappropriate sexual behaviour
- Incoherent/changing account of events
- Repeating a story that you have heard elsewhere
- Unexplained eagerness to leave a safe space/to work
- Sexually transmitted diseases
- Missing episodes (especially from care – under 18s)
- Limited/sporadic school attendance (under 18s)

[Modern Slavery Awareness Booklet.pdf](#)

6. 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.

7. Further Steps

Following a review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking:

- Monitoring of our business and its supply chains to ensure we are free from slavery and human trafficking.
- Require our contractors and supply chains to act in accordance with our Anti-Slavery policy when dealing with us.
- Promotion of our Anti-Slavery Policy along with a training program to ensure our staff understand and adopt our values.

This policy is made pursuant to section 54(1) of the Modern Slavery Act 2015

8. Reporting Concerns of Modern Slavery

Any employee should report concerns to Business Director, Paul Yeomans. (To Managing Director, Darby Booth in Paul's absence.)

Allowing some qualification of the concern Paul will officially report by phoning **999** if there is an immediate risk of harm.

Reporting to the police on **101** or the Modern Slavery Helpline on **08000 121 700** if there is not an immediate risk of harm.

(You do not need to be sure that modern slavery is taking place or fully understand the types and definitions to report your concerns.)

9. Monitoring

This policy will be monitored by the Director; this will include the review of legal obligations, as well as making this policy available to all interested parties.

For and on behalf of Warwick SASCo Ltd.