

ANTI-SLAVERY

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CONTENTS

REVISION TABLE	2
1. ANTI-SLAVERY POLICY STATEMENT	3
2. WHAT IS MODERN SLAVERY	4
3. POLICIES AND PROCEDURES	4
4. YOUR RESPONSIBILITIES	5
5. INVESTIGATION PROCESS AND EMPLOYEE PROTECTION	5

KEY

[A31] = Electronic Folder Reference

REVISION TABLE

Revision	Date	Comments
1	07.12.16	-
2	25.05.18	Reviewed by J Walpole. No changes.
3	01.07.19	Reviewed by J Walpole. No changes.
4	30.06.20	Added sections on Investigation Process and Employee Protection

1. ANTI-SLAVERY POLICY STATEMENT

Robert Walpole & Partners (RWP) is committed to preventing slavery, both within the company and its supply chain.

RWP is committed to treating all members of the workforce fairly and with respect. RWP has a zero-tolerance policy regarding slavery and human exploitation. Any employee or supplier found to be facilitating, encouraging or being otherwise associated with slavery-related activities will face disciplinary action. Normally this results in dismissal in the case of employees, or the termination of business arrangements in the case of suppliers. These cases will also be reported to the police under the Modern Slavery Act 2015.

RWP seeks to promote slavery awareness among staff, suppliers and customers where possible. The policy applies to all applicants, employees and clients. Suppliers are encouraged to incorporate a similar policy into their own policy documentation.

Robert Walpole & Partners is committed to:-

- a) Providing training and guidance for key decision makers such as management and those involved in the supply chain management process.
- b) Examining and reviewing existing procedures for recruitment, supplier selection and approval.
- c) Developing mechanisms for resolving accusations of slavery.
- d) Reviewing this policy on a regular basis.

Progress in implementing this policy will be reviewed annually by the partners.

Signed: _____

M. J. Walpole

M. J. Walpole
Senior Partner

Date: 30.06.20

2. WHAT IS MODERN SLAVERY

Modern slavery is defined as the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation. It is a crime under the Modern Slavery Act 2015 and includes holding a person in a position of slavery, servitude forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after (Public Health England [website](#), %Modern slavery and public health+ published 7 December 2017).

More information and guidance related to Modern Slavery Act 2015 can be found by visiting government website: <https://www.gov.uk/government/collections/modern-slavery-bill>.

3. POLICIES AND PROCEDURES

RWP has a number of policies in place to ensure that all of our business is conducted in honest and ethical manner. These include:

- Quality Assurance Policy (part 1 of RWP Office Manual) that describes various training opportunities we provide to our staff and our process for selecting suppliers.
- Health & Safety Policy (part 2 of RWP Office Manual) that describes our approach to general health and safety aspects of employment as well as management of Occupational Health.
- Equality Policy (part 4 of RWP Office Manual) that regulates how we advertise job opportunities and subsequently recruit people.
- Sustainable Procurement Policy (part 24 of RWP Office Manual) that explains what we do in terms of social responsibility.

The nature of our business means that the greatest risk of encountering modern slavery is embedded within our supply chain. Therefore, Supplier's Questionnaire completed during supplier approval process, incorporates a section intended to assess potential supplier's approach to modern slavery. Once approved, supplier's performance is regularly monitored, and any identified issues are conveyed using Feedback on Suppliers form. This is then followed up by further communications to verify what corrective actions were implemented thus completing due diligence on our supply chain.

4. YOUR RESPONSIBILITIES

You must ensure that you read, understand and comply with this policy.

You must not engage in any form of modern slavery.

The prevention, detection and reporting of any form of modern slavery are the responsibility of all those working for RWP or under our control. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify a business Partner as soon as possible if you believe or suspect that a conflict with or breach of this policy has occurred or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion at the earliest possible stage. If you are unsure or if you have any other queries or concerns, these should be raised with business Partner.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with other workers if they breach this policy.

5. INVESTIGATION PROCESS AND EMPLOYEE PROTECTION

All concerns regarding suspected conflict with or breach of this policy should be reported to business Partner as soon as possible and will be dealt with in accordance with RWP Investigation and Grievance process (part 21 of RWP Office Manual).

In line with RWP Whistleblowing Policy (part 8 of RWP Office Manual), no one who reports any concern under this policy in good faith will be subjected to any detriment for coming forward.