

# Modern Slavery Policy Statement

## Overview

### Who the policy affects

This policy is for members and representatives of Dewi Development Ltd.

### Purpose

Modern Slavery is a complex issue that requires all organisations to work together to prevent modern slavery and for everyone to be aware of the signs of modern slavery and to raise concerns.

While Dewi Development does not meet the criteria of section 54 of the Modern Slavery Act, which details the criteria for having a Modern Slavery Policy Statement; Dewi Development is committed to playing its part in ensuring modern slavery does not enter its supply chain.

### Scope

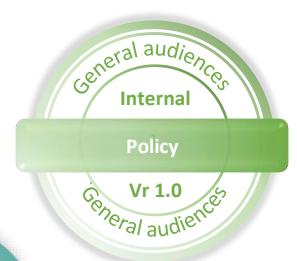
The policy includes all people representing the organisation from director to employee, temporary staff, sessional staff, agency staff, contractors and volunteers who are part of delivering Dewi Development training services. All employees are included whether full time, part time, office based or home working.

The policy does not form part of the terms and conditions of employment with Dewi Development Ltd.

### Effective Date

This policy applies from 15 October 2019.

The company holds the right to update the policy at any time.



# Policy

## 1. Company Structure and Supply Chain

- 1.1. Dewi Development is a small local company which provides business support services and training to individuals.
- 1.2. Dewi Development currently consist of the company director and freelance trainers or acting casualties.
- 1.3. Dewi Development utilises companies in the supply chain to provide business support services, provide training materials, branded handouts and webhosting.
- 1.4. Dewi Development utilises companies in the UK or in Europe.

## 2. Policies

- 2.1. Dewi Development are committed to ensuring Modern Slavery does not enter our supply chain or our business.
- 2.2. We will follow:
  - 2.2.1. A recruitment process which confirms the right to work in the UK.
  - 2.2.2. A procurement process that checks with suppliers if they have Modern Slavery Statement or commitment against Modern Slavery.
  - 2.2.3. A procurement process which will end associations with suppliers, if they are discovered to have Modern Slavery in their supply chain or discovered to have poor processes to prevent Modern Slavery occurring.
  - 2.2.4. An informal whistle blowing policy to raise concerns direct to the Company Director or direct to the Modern Slavery Helpline.

## 3. Due diligence

- 3.1. We recognise as a small company it is not possible to have relationship with all links in the supply chain, but we expect our suppliers to know the next level down in their chain, with them undertaking necessary checks and requesting the necessary assurances for the next level below.
- 3.2. In order to identify and mitigate risk we will:
  - 3.2.1. Aim to utilise companies within the UK
  - 3.2.2. Request if company has Modern Slavery policy and that a supplier provides yearly updates.
  - 3.2.3. Include Modern Slavery statements in our contracts.
  - 3.2.4. Terminate agreements with suppliers who fail to tackle or improve their performance with modern slavery in their supply chains.
  - 3.2.5. Terminate agreements with customers who are identified as carrying out modern slavery.
  - 3.2.6. Follow a robust recruitment process.
  - 3.2.7. Encourage people to come forward with concerns of Modern Slavery.
  - 3.2.8. Carry out reviews of our Modern Slavery policies.

## 4. Training

- 4.1. All staff will be made aware of this policy and encouraged to raise concerns where they believe modern slavery is taking place.

- 4.2. We will encourage staff to develop their knowledge of modern slavery by undertaking on-line learning, additional reading or attending talks.

## 5. Performance

- 5.1. We will monitor our performance based on the number of concerns raised and the actions taken to resolve the concerns.

## 6. Review

- 6.1. The policy will be reviewed on a yearly base or where a concern identifies the policy needs updating.
- 6.2. The policy will be monitored on its success on not working with organisation utilising modern slaves in their supply chain.

## Compliance

A staff member may find themselves facing disciplinary action or in extreme cases, disbarred in line with laws of the country, if they are found to have breached of this policy.

## Related Legislation

- Modern Slavery Act 2015

## Definitions

| Term           | Definition   |
|----------------|--|
| Modern Slavery | <p>The following definitions are encompassed in the term Modern Slavery as part of the Modern Slavery Act 2015:</p> <ul style="list-style-type: none"><li>➤ 'slavery' is where ownership is exercised over a person .</li><li>➤ 'servitude' involves the obligation to provide services imposed by coercion.</li><li>➤ 'forced or compulsory labour' involves work or service extracted from any person under the menace of a penalty and for which the person has not offered himself voluntarily.</li><li>➤ 'human trafficking' concerns arranging or facilitating the travel of another with a view to exploiting them.</li></ul> |

## Document Information

### Document Control

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### Version

| Version | Author        | Date       | Summary Changes |
|---------|---------------|------------|-----------------|
| 0.1     | David Husband | 15/10/2019 |                 |
| 1.0     | David Husband | 16/10/2019 | Approval        |

### Authors

| Author        | Company          | Job Title | Department |
|---------------|------------------|-----------|------------|
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### Retention

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| Retention details | Document is appropriate until replaced. |

### Disposal

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