

## **Scope of Policy**

This policy applies to persons working for us, external consultants, and the supply chain.

## **Stephen George + Partners LLP**

We have a zero-tolerance approach to modern slavery, we are committed to acting ethically and with integrity in all our business dealings and relationships; implementing and enforcing effective systems and controls to ensure Modern Slavery is not taking place anywhere in our own business or in any of our supply chains.

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.

## **Policy Statement**

At Stephen George + Partners we aspire to maintain the highest standard of employee conduct and ethical behaviour. We encourage confidential reporting of concerns related to the direct activities of our business and supply chain. We operate with a zero tolerance of slavery and human trafficking within our business. Our internal recruitment process involves us working only with selected reputable employment agencies, which eliminates the risk of slavery and human trafficking.

## **The organisation identifies foreign workers and their nationalities**

Stephen George + Partners requires two forms of identification for each potential new member of staff (e.g. Passport, Driving Licence and/or Birth Certificate). A manual check is carried out obtaining the original version of the document checking the validity in the presence of the holder and retaining a clear copy for filing in accordance with the Right to Work Checklist published on [www.gov.co.uk](http://www.gov.co.uk). We record all the documents electronically on a dedicated HR server complying with GDPR requirements.

Personal information is retained for the duration of an employee's contract and is deleted following one year after the individual leaves.

For non-nationals our practice requires the right to work in the UK to be provided where applicable.

Every six months we carry out online checks for updates on the official government website assuring all the procedures in place are up to date.

In line with the Home Office Comprehensive Guidance for Employers on Preventing Illegal Working, Stephen George + Partners assesses the employees against List A (Acceptable documents to establish a continuous statutory excuse) or List B (Documents where a time-limited statutory excuse lasts until the expiry date of leave/lasts for 6 months) depending on their status.

Should any matters arise falling under Sections 15 to 25 of the Immigration, Asylum & Nationality Act 2006, we would adhere to the specified actions required by them.

## **Modern Slavery Policy**

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### **Procedure**

All employees within the business will be provided with full training on Modern Slavery Policy.

Confidential reporting of concerns relating to the direct activities of our business and supply chains are covered in our Equality & Diversity Policy and Whistleblowing Policy.

Lists of our policies can be found within the Employment Handbook.

### **Partners' Approval**

This statement has been approved by the Partners, reviewed annually and published in accordance with current law.

A handwritten signature in black ink, appearing to read 'J. Nicholls', with a stylized flourish at the end.

James Nicholls  
Managing Partner  
Date: 03 December 2021