

## GEM Partnership Ltd Modern Slavery and Remediation Policy

### 1. Policy

- 1.1 GEM Partnership Ltd is committed to eliminating modern slavery, human trafficking, forced labour, and similar human rights abuses.
- 1.2 GEM Partnership Ltd is committed to ensuring that its staff and any workers it supplies (directly or indirectly) are not subject to behaviour or threats that may amount to modern slavery, human trafficking, forced labour, and similar human rights abuses.
- 1.3 GEM Partnership Ltd provides appropriate training and awareness information for all of its staff. In particular:
  - 1.3.1 Our Senior Managers receive detailed training in identifying and resolving concerns around modern slavery and human trafficking.
  - 1.3.2 All of our staff receive awareness-raising information around issues involving modern slavery and human trafficking, so that they can bring any concerns they have to the attention of management.
- 1.4 Any staff, workers or other parties are strongly encouraged to report any concerns or suspicions that they might have to the Designated Safeguarding Team (DST) – Julie Hunter – Safeguarding Governance, or Kelly Lee – Safeguarding Lead or Annie Dorner – Safeguarding Officer on (0191) 5872999

### 2. Reports

- 2.1 Reports surrounding these issues are taken extremely seriously by our Directors who are committed to ensuring that all investigations shall be prompt and effective. If our investigations reveal any issues, we are committed to taking appropriate action, including but not limited to:
  - 2.1.1 Working with the appropriate organisations to improve standards,
  - 2.1.2 Removing that organisation from our preferred supplier list,
  - 2.1.3 Passing details to appropriate law enforcement bodies.
- 2.2 We regularly monitor our risks in this area through the use of relevant key performance indicators, including:
  - 2.2.1 The amount of time spent on audits, re-audits, spot checks, and related due diligence, and
  - 2.2.2 The level of modern slavery training and awareness amongst our staff.
- 2.3 As part of our efforts in this area, we publish a modern slavery statement on an annual basis.
- 2.4 We would also recommend reading this in conjunction with our other policies, including our:
  - 2.4.1 Corporate Social Responsibility and Community Policy
  - 2.4.2 Child Labour and Remediation Policy
  - 2.4.3 Ethical Trading Statement and Policy
  - 2.4.4 Bribery and Corruption Policy
  - 2.4.5 Whistleblowing Policy
  - 2.4.6 Human Rights Statement
  - 2.4.7 Safeguarding Children and Vulnerable Adults Policy
  - 2.4.8 Equality and Diversity Policy and Procedure
  - 2.4.9 Staff Recruitment and Selection Policy
  - 2.4.10 Responsible Recruitment Policy
  - 2.4.11 Anti-Harassment and Bullying Policy
  - 2.4.12 Sexual Harassment Policy
  - 2.4.13 GEM Safeguarding Children and Vulnerable Adults Policy
- 2.5 This policy was adopted on Wednesday 19<sup>th</sup> October 2016 after being agreed by our Directors. It is reviewed annually and last reviewed on Friday 4<sup>th</sup> April 2025.

### **3. Remediation Procedures**

3.1 If modern slavery is found, it is vital to act quickly and to protect the victim.

#### **3.2 Step One: Definition of a complaint**

3.2.1 GEM Partnership Ltd defines a complaint as a report of violation against GEM Partnership's Modern Slavery and Remediation Policy that has occurred in Company's supply chain and has a direct adverse human rights impact. The complainant should be able to produce sufficient information to demonstrate the relevance and seriousness of the complaint.

#### **3.3 Step Two: Creating a remediation team**

3.3.1 GEM Partnership Ltd recognizes that it is important to identify and establish a remediation team in order to develop the business's remediation procedure. This should be made up of representatives from GEM Partnerships DST, the workforce, managers, and local non-governmental organization (NGOs) with expertise in modern slavery and forced labour where available. If there is an existing government or civil society-backed organisation, process or project providing remedy for victims of modern slavery, these should be identified and involved in the creation of the remediation team.

3.3.2 Protecting the victim of slavery must be the first priority of the remediation team. The remediation team must understand the specific needs, circumstances and aspirations of each victim and what it was that pushed them into modern slavery.

#### **3.4 GEM Partnership Ltd will take the following steps when designing a remediation procedure:**

3.4.1 Identify a remediation team, including local experts where available

3.4.2 Define the roles and responsibilities of each party

3.4.3 Decide who will be funding the remediation programme

3.4.4 Document what would constitute a grievance and what information the complainant should be able to provide to demonstrate the relevance and seriousness of the complaint

3.4.5 Document what channels are available to workers and relevant third parties for raising grievances

3.4.6 Ensure that workers and relevant third parties are aware of all of these channels

3.4.7 Document how the Company will carry out an investigation, should an incident of modern slavery be identified

3.4.8 Identify and document what remedy the business will offer to victims of modern slavery, including restitution (restoring victim to original situation before abuses occurred), compensation (financial or otherwise), rehabilitation (medical, physiological or psychological care) and satisfaction and guarantee of non-repetition

3.4.9 Identify and document relevant government and/or civil society-backed support mechanisms that victims of slavery can access

3.4.10 Ensure that the procedure acknowledges that victims have the right to pursue other forms of remedial action at any stage beyond internal remedy mechanisms

3.4.11 Decide and document how the business will contribute to programmes to assist victims of modern slavery, e.g. through vocational training or other appropriate measures

3.4.12 Decide and document how the outcomes of any investigation will be communicated, bearing in mind the need to protect victims

3.4.13 Establish a review procedure to ensure that the remediation policy is effective and to review the root causes of any incidents of modern slavery

3.4.14 Share the remediation procedure with all workers on site (where appropriate).

#### **3.5 Step Three: Dealing with a case of modern slavery**

3.5.1 Protecting victims of slavery is the most fundamental principle of this remediation policy. GEM Partnership Ltd acknowledges that, once an allegation of modern slavery is made, victims should be:

3.5.1.1 Taken to a place of safety, with appropriate security

3.5.1.2 Vulnerabilities considered for example, gender, disability, age

3.5.1.3 Supported by a colleague, appropriate person or trade union representative if applicable

3.5.1.4 Provided with reassurance and welfare (food, drink, medical assistance)

- 3.5.1.5 Informed of what third parties are involved or contacted (if any)
- 3.5.1.6 Informed of the business's remediation procedure and the support that is available to them
- 3.5.1.7 Asked what remediation they are looking for, e.g. financial, psychological support
- 3.5.1.8 Given access to relevant government or third-party remediation services such as the police (if it is safe to do so) or other recognised non-governmental organizations/civil society-backed organisations
- 3.6 At all stages, GEM Partnership Ltd will take steps to protect confidentiality and collect evidence including:
  - 3.6.1 Ensuring that suitable DSO/Managers are responsible for running the investigation without links to the allegations
  - 3.6.2 Recording what the victim says and making full notes of all the circumstances
  - 3.6.3 Keeping multiple victims separate, speaking to them individually and noting signs of suspects trying to make contact
  - 3.6.4 Having an independent/telephone interpreting service ready to use.
- 3.7 The GEM Partnership process for responding to violations will be to:
  - 3.7.1 Conduct an initial assessment of the allegations to ensure that there is sufficient information to understand the exploitation discovered and remedy it
  - 3.7.2 Ascertain if a supplier or labour user is implicated
  - 3.7.3 Report the allegations to relevant authorities
  - 3.7.4 Capture evidence about the violations, using an independent third party if necessary
  - 3.7.5 Gather information from those affected
  - 3.7.6 Take steps to correct the situation for the worker which will need to be relevant to the individual circumstances. This could include provision such as housing support, legal assistance, medical care or psychological support.
  - 3.7.7 Compensate the victim or restore their situation to before their ordeal took place
  - 3.7.8 Work with local authorities and competent local organisations to provide assistance
  - 3.7.9 Review progress over a suitable time period and verify that progress with local authorities and local organisations
  - 3.7.10 Document remedial steps taken
  - 3.7.11 Build learnings into remediation procedures and operational procedures to prevent re-occurrence.
- 3.8 **Step Four: Ongoing support and monitoring**
  - 3.8.1 It is important for GEM Partnership Ltd to monitor the progress of any remediation programme and to provide ongoing support for victims of slavery. Monitoring will include the following steps:
    - 3.8.1.1 Monitoring the victim's progress if the victim has been referred to a government or civil society-managed referral mechanism or similar
    - 3.8.1.2 Evaluating how effective the remediation procedure was and amending it accordingly
    - 3.8.1.3 Reviewing internal policies and procedures to determine what needs to change to prevent slavery from re-occurring.
    - 3.8.1.4 Ongoing support required should be determined with the victim. It may take the form of a financial stipend whilst the victim is not working.